US Department of the Interior
Bureau of Land Management
Uncompahgre Field Office, Colorado

Resource Management Plan Revision and Environmental Impact Statement

FINAL SCOPING SUMMARY REPORT
JULY 2010

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ACRONYMS AND ABBREVIATIONS

	Full Phrase
ACEC	Areas of Critical Environmental Concern
BLM	United States Department of the Interior, Bureau of Land Management
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
EIS	environmental impact statement
FLPMA	Federal Land Policy and Management Act of 1976
NCA	National Conservation Area
NEPA	National Environmental Policy Act
planning area	all lands, regardless of ownership, within the United States Department of the Interior, Bureau of Land Management, Uncompahgre Field Office, Colorado, excluding the Dominguez-Escalante and Gunnison Gorge National Conservation Areas
public lands	lands administered by the United States Department of the Interior, Bureau of Land Management
RAC	Resource Advisory Council
RMP	resource management plan
UFO	Uncompahgre Field Office
US	United States

SUMMARY

The United States Department of the Interior, Bureau of Land Management (BLM), Uncompahgre Field Office is preparing a resource management plan (RMP) to revise management direction for BLM-administered lands. The Uncompahgre Field Office is responsible for the management and stewardship of approximately 675,760 surface acres of BLM-administered land and 2,140,720 million acres of subsurface federal mineral estate within the Uncompahgre RMP planning area in southwestern Colorado. The planning area excludes the Gunnison Gorge and Dominguez-Escalante National Conservation Areas. 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 Uncompahgre 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

Public outreach for the Uncompahgre RMP/EIS during the public scoping period has included: 1) a newsletter mailed in December 2009 to over 350 agency officials, organizations, and members of the public; 2) seven scoping open houses in January and February 2010 in Hotchkiss, Delta, Montrose, Ridgway, Norwood, Naturita, and Telluride, Colorado; 3) notices published in six newspapers in Delta, Montrose, Norwood, Ouray, Ridgway, and Telluride, Colorado; and 4) a public Web site, http://www.uformp.com, which provides access to materials distributed at scoping meetings, as well as information on the public involvement process. The formal public comment period as required by the National Environmental Policy Act of 1969 (Public Law 91-190) began on February 25, 2010, with the publication of a Notice of Intent in the *Federal Register* and ended on March 29, 2010.

PUBLIC SCOPING RESULTS

The BLM received 214 unique written submissions and 13 different form letters including a total of 2,496 unique 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 commenter affiliation.

Members of the general public provided written 155 submissions (72.4 percent) during the scoping period, organizations or non-profit groups submitted 23 comments (10.7 percent), and businesses submitted 18 comments (8.4 percent). Federal agencies submitted 5 written submissions (2.3 percent), state agencies submitted 5 written submissions (2.3 percent), and local governmental agencies submitted 7 written submissions (3.3 percent), for a total of 7.9 percent of the submissions from government. One comment (0.5 percent) was received from an educational institution. No written submissions were received from tribal governments or organizations or elected officials.

ISSUE SUMMARY

Based on internal (within the Uncompahgre Field Office) and external scoping, the following planning issues have been identified. Comments received were classified into the planning issues below and into subcategories for each issue.

Issue 1. How will vegetative resources, terrestrial and aquatic habitat, water resources, and special management areas be managed while maintaining biological diversity and native species populations?

Issue 2. How will energy and minerals resources be managed?

Issue 3. How will human activities and uses be managed?

Issue 4. How will land tenure, withdrawals, and utility/energy corridors be managed or adjusted?

Issue 5. How will cultural, historical, and paleontological resources, and Native American religious concerns be managed and protected?

Issue 6. How do population growth and an expanding urban interface affect the management of public lands and resources, including authorized and permitted land uses, while considering community values and needs?

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 Uncompahgre Field Office 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 Uncompahgre Field Office 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 2012. 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 throughout the RMP process.

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SECTION 1
INTRODUCTION

The United States (US) Department of the Interior, Bureau of Land Management (BLM), Uncompahgre Field Office (UFO) is preparing a resource management plan (RMP) to revise management direction for BLM-administered (public) lands. The UFO is responsible for the management and stewardship of approximately 675,760 surface acres of public land and 2,140,720 million acres of subsurface federal mineral estate within the Uncompahgre RMP planning area in southwestern Colorado. The planning area includes all lands, regardless of ownership, with the BLM UFO, excluding the Gunnison Gorge and Dominguez-Escalante National Conservation Areas. In conjunction with the RMP, an environmental impact statement (EIS) will be prepared to analyze the environmental effects that could result from implementing the alternatives addressed in the RMP. The affected lands are currently managed under the San Juan/San Miguel RMP (BLM 1985), as amended, and the Uncompahgre Basin RMP (BLM 1989), as amended.

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 Uncompahgre RMP are subject to the requirements of NEPA.

1.1 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. The Federal Land Policy and Management Act of 1976 (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).

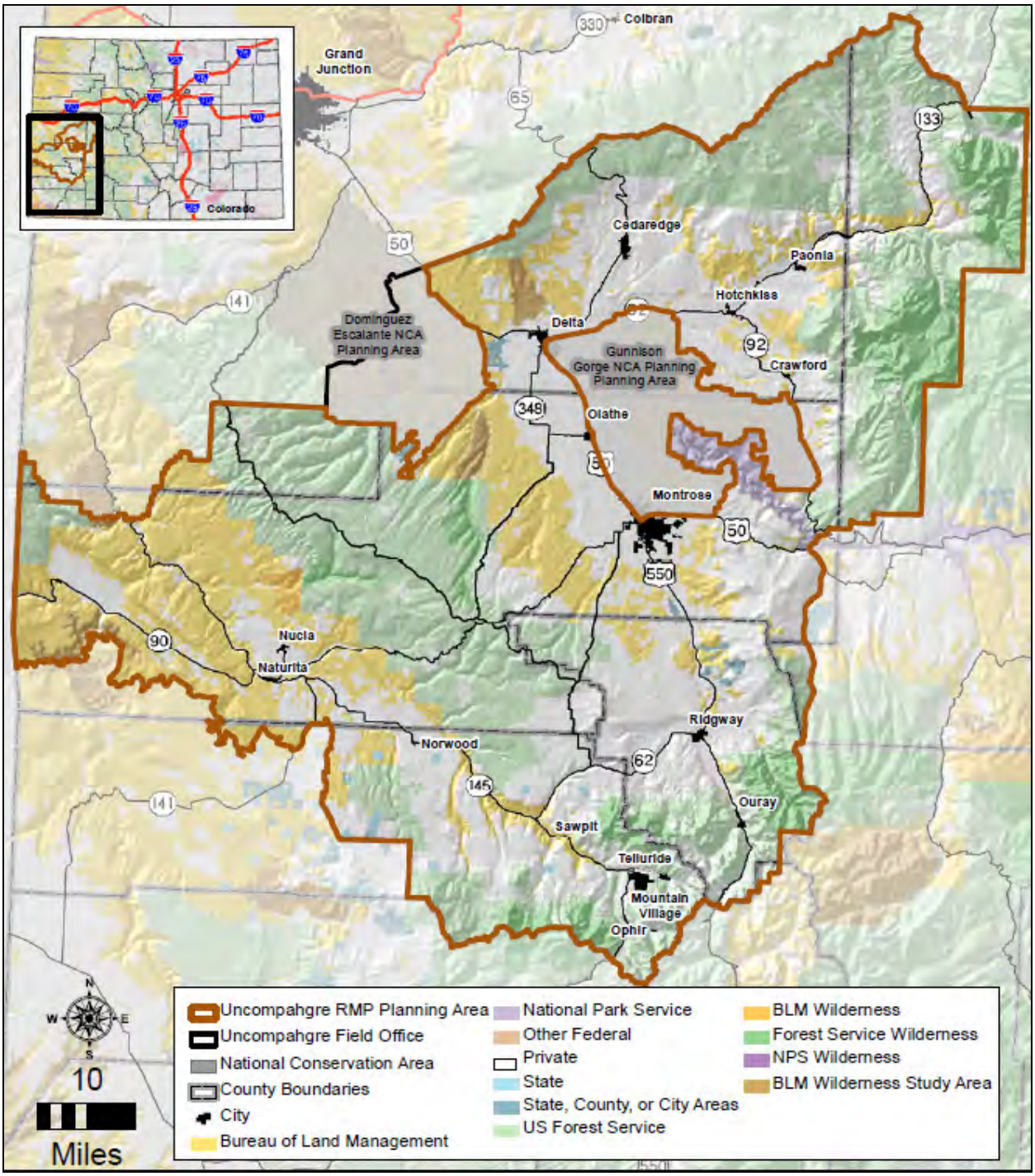
The BLM-administered public lands within the Uncompahgre RMP planning area are currently managed in accordance with the decisions in the 1985 San Juan/San Miguel Basin RMP (BLM 1985) and the 1989 Uncompahgre Basin RMP (BLM 1989). The BLM has completed approximately 50 maintenance actions, 10 plan amendments, and 2 activity plans since the 1985 and 1989 Records of Decision were signed. Since the dissolution of the Montrose District, the San Juan/San Miguel RMP has been used by both the Uncompahgre Field Office and the San Juan Public Lands Center (Dolores Field Office). The San Juan Public Lands Center is in the draft stage of their RMP revision and is revising the portion of the San Juan/San Miguel RMP that falls under their jurisdiction.

Although the 1985 and 1989 RMPs have been subsequently amended, they do 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 1989 Uncompahgre Basin RMP (BLM 1985) and 1985 San Juan/San Miguel RMP (BLM 1989), 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 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.

1.2 DESCRIPTION OF THE RMP PLANNING AREA

The planning area encompasses approximately 3,097,500 million acres of federal, state, and private lands primarily in six counties—Montrose, Delta, Mesa, Gunnison, Ouray, and San Miguel. Refer to **Figure 1-1**, Uncompahgre RMP Planning Area. Twenty-five distinct and diverse communities exist within the UFO; the communities have very different economic bases, values, and resources, and include high-end resort communities, farm and ranching communities, coal mining towns, and others. Management direction outlined in the RMP will apply to 675,760 surface acres of public lands administered by the BLM. In addition the plan will provide management direction for 2,140,720 million acres of subsurface federal mineral estate, including 1,269,720 acres of federal minerals under other federal land, as well as 295,000 acres of federal minerals under private and state lands. The RMP will not provide management direction for the Gunnison Gorge or Dominguez-Escalante National Conservation Areas (NCA), as these NCAs are outside the Uncompahgre RMP planning area and are or will be covered under separate RMPs.



Uncompahgre RMP Planning Area

No warranty is made on the accuracy, reliability and completeness of these data for individual use or aggregate use with other data. Spatial data may not meet National Map Accuracy Standards. This information may be updated without notification.

Figure 1-1

1.3 OVERVIEW OF PUBLIC INVOLVEMENT PROCESS

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 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) (BLM 2005). Public involvement requirements of both NEPA and FLPMA will be satisfied through this joint RMP/EIS process.

Public involvement for the Uncompahgre 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, news releases, and newspaper advertisements;
- Collaboration with federal, state, local, and tribal governments; the BLM Colorado Southwest 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 two phases of the public involvement process beginning with public scoping and provides information about the ongoing collaboration process.

Scoping is an early and open process for determining the scope of issues to be addressed and 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 UFO 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 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 [BLM 2005]) 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.

1.4 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.

1.4.1 Newsletter and Mailing List

In December 2009, the BLM mailed a newsletter announcing the start of the public scoping period for the Uncompahgre RMP/EIS to more than 350 individuals from the public, agencies, and organizations who had participated in past UFO activities and had been included on past UFO distribution lists. The newsletter provided the dates and venues for the original six scoping open houses (Hotchkiss, Delta, Montrose, Ridgway, Norwood, and Naturita) (see **Section 1.4.6**, Scoping Open Houses), included an insert with a comment form for submitting scoping comments, and described the various methods for submitting comments, including dedicated e-mail 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. All newsletters will be posted on the project Web site (http://www.uformp.com). Participants may request to receive newsletters and other project information through electronic or postal mail. The newsletter is included in **Appendix A**, Scoping Materials.

1.4.2 Press Release and Newspaper Advertisements

A press release was posted on the project Web site (http://www.uformp.com) on January 5, 2010, announcing the scoping period for the Uncompahgre RMP/EIS process. It also provided information on the original six scoping open houses (see **Section 1.4.6**, Scoping Open Houses) and described the various methods for submitting comments.

A second press release was posted on the project Web site on March 2, 2010, announcing the extension of the public scoping period to March 29, 2010.

A newspaper advertisement was published in six local newspapers in December 2009 and January 2010 prior to the scoping meetings. **Table 1-1**, Newspaper Advertisement Publication Dates and Location, displays the date each newspaper published the advertisement. This newspaper advertisement announced the original six scoping open houses (see **Section 1.4.6**, Scoping Open Houses). The newspaper article and press releases are included in **Appendix A**, Scoping Materials.

Table 1-1
Newspaper Advertisement Publication Dates and Location

Newspaper	Location (Colorado)	Date(s) Advertisement Appeared
Delta County Independent	Delta	December 23, 2009 January 6, 2010
Montrose Daily Press	Montrose	December 30, 2009 December 31, 2009 January 6, 2010 January 10, 2010
Norwood Post	Norwood	December 30, 2009 January 20, 2010
Ouray Plaindealer	Ouray	January 8, 2010
Ridgway Sun	Ridgway	January 6, 2010 January 13, 2010
Telluride Daily Planet	Telluride	January 20, 2010 February 2, 2010

1.4.3 Newspaper Articles

Six local newspapers are known to have published their own articles covering the RMP revision and scoping period. **Table 1-2**, Newspaper Articles, displays each newspaper's publication date of the articles.

Table 1-2
Newspaper Articles

Newspaper	Date(s) Article(s) Appeared
Delta County Independent	January 20 and 27, 2010
Montrose Daily Press	January 15 and February 3, 2010
Norwood Post	January 23, 2010
Ridgway Sun	January 13, 2010
San Miguel Basin Forum	January 21 and 28, 2010
Telluride Daily Planet	January 17 and February 2, 2010

1.4.4 Flyer

A flyer announcing the dates and locations of the original six scoping open houses (see **Section 1.4.6**, Scoping Open Houses) was posted in various public locations in Delta, Hotchkiss, Montrose, Naturita, Norwood, Nucla, Paonia, and Redvale, Colorado, on January 8 and 12, 2010. The flyer is included in **Appendix A**, Scoping Materials.

1.4.5 Project Website

A public Web site was launched and is regularly updated to provide the public with the latest information about the RMP/EIS process. The Web site, available on the Internet at http://www.uformp.com, 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 newsletter and Notice of Intent. The site also provides a link to the scoping comment form for submitting comments about the RMP process. The dates and locations of all seven scoping open houses were announced on the Web site.

1.4.6 Scoping Open Houses

The BLM hosted seven open houses to provide the public with opportunities to become involved, learn about the project and the planning process, meet the Uncompahgre RMP team members, and offer comments. The seventh open house in Telluride was added in response to a special request from the San Miguel County Commissioners. The six originally scheduled open houses were advertised via press release, newspaper advertisements, the project newsletter, the project Web site, and a flyer posted in various towns throughout the planning area. The locations of the open houses are provided in **Table 1-3**, Scoping Open Houses.

Table 1-3
Scoping Open Houses

Location (Colorado)	Venue	Date	Number of Attendees	Number of Completed Comment Forms Received
Hotchkiss	Memorial Hall	January 12, 2010	99	11
Delta	Bill Heddles Recreation Center	January 13, 2010	42	0
Montrose	Montrose Pavilion	January 14, 2010	84	1
Ridgway	Town Hall	January 19, 2010	41	3
Norwood	Town Hall	January 20, 2010	26	0
Naturita	Community Building	January 21, 2010	60	2
Telluride	Miramonte Building	February 3, 2010	17	0
Total			**369**	**17**

Note: Meetings were from 4:30 to 7:30 pm, except in Delta and Montrose where meetings were from 4:30 to 8:00 pm, and Telluride where the meeting was from 2:00 to 4:00 pm.

Scoping meetings were held in an open house format to encourage participants to discuss concerns and questions with BLM staff representatives. Copies of the first issue of the project newsletter, as well as blank scoping comment forms and a guide to providing substantive comments, were available at the sign-in station. A Microsoft PowerPoint presentation that provided an overview of the RMP process and presented information about public involvement opportunities was played continuously on a large screen. Eight resource stations displayed resource maps and information to illustrate the current situation and management techniques practiced among different resources and land areas. At those stations, 16 fact sheets for various resources provided an overview of current management practices and issues. At the recreation

station, information regarding the recreation public focus group meetings to be held in February 2010, including a sign-up sheet for those meetings, was provided. As shown in **Table 1-3**, Scoping Open Houses, 369 people attended the open houses.

1.4.7 Notice of Intent

The Notice of Intent notifies the public of the BLM's intent to develop the Uncompahgre RMP. It also initiates the formal scoping public comment period as required by NEPA, which extends 30 days following publication in the *Federal Register*. The Notice of Intent was published on February 25, 2010, and the official scoping comment period ended on March 29, 2010. Comments received on or before April 9, 2010, are included in this report. The BLM will consider all comments received during the planning process, both before and after the publication of the Notice of Intent. The Notice of Intent is posted on the project Web site (http://www.uformp.com).

1.5 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 and will include working closely with cooperating agencies and the Southwest RAC via 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.

1.5.1 Community Assessment

The BLM, assisted by a community facilitator and contractor staff, held 22 community assessment meetings from late October to mid-December 2008. This pre-planning process gathered input from communities about their vision for the landscape and benefits they seek from public lands, identified strategic planning options, and laid the foundation for an on-going collaborative relationship with communities for the RMP effort. Results of this process were published in the Community Assessment of the Uncompahgre Planning Area (BLM 2009). This report is available for review on the RMP website (http://www.uformp.com) and available from the BLM upon request.

1.5.2 Economic Strategy Workshops

On March 9, 10, 16, and 17, 2010, the UFO hosted six economic strategies workshops in Montrose, Delta, Hotchkiss, Ridgway, Norwood, and Naturita, Colorado. In total, 90 citizens, local government representatives, and local interest group representatives attended the workshops. These workshops provided an opportunity for stakeholders from local communities to participate in the planning process. Attendees discussed economic trends in the region, viewed current and historical socioeconomic data, and developed visions for the economic future of their communities. The attendees also discussed how BLM management of public lands is tied to the economy in local communities and in the region as a whole. The socioeconomic baseline report detailing existing socioeconomic conditions in the planning area and the results of the economic strategy workshops will be available for review on the RMP website (http://www.uformp.com) and available from the BLM upon request when complete in the summer of 2010.

1.5.3 Cooperating Agencies

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 [BLM 2005]). 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 January 23, 2009, the BLM wrote to 40 local, state, federal, and tribal representatives, inviting them to participate as cooperating agencies for the Uncompahgre RMP. As of April 2010, 19 agencies have agreed to participate in the RMP as designated cooperating agencies, and all have signed Memoranda of Understanding with the UFO (**Table 1-4**, Cooperating Agency Participation).

The first cooperating agency meeting was held on May 27, 2010. Meetings will be held monthly through October 2010 and less frequently after October. 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.

1.5.4 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 [BLM 2005]). A RAC is generally composed of 15 members of the public, representing different areas of expertise. The Colorado Southwest RAC includes members appointed to represent constituent public land users and provides input on public management issues to the BLM's Southwest RAC Designated Federal Officers and Western Slope Center Manager. Recommendations are based on consensus building and collaboration.

The Colorado Southwest RAC has been involved in the preliminary planning issues for the Uncompahgre RMP. In addition, a nine-member 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. The first RAC subgroup meeting was held on May 27, 2010. Meetings will be held monthly through October 2010 and less frequently after October. It is anticipated that meetings will continue throughout the development of alternatives and the draft RMP. Future meeting dates will be posted on the project website (http://www.uformp.com).

Table 1-4
Cooperating Agency Participation

Agencies and Tribes Invited to be Cooperators	Accepted as of July 2010
US Department of the Interior, Fish and Wildlife Service	✓
US Department of the Interior, Bureau of Reclamation	✓
US Department of the Interior, National Park Service – Black Canyon National Park	
US Department of Agriculture, National Forest Service – Grand Mesa, Uncompahgre, and Gunnison National Forests	✓
US Department of Agriculture, National Forest Service – San Juan National Forest	
US Department of Agriculture, National Resource Conservation Service – Colorado State Office	
US Department of Agriculture, Animal and Plant Health Inspection Service	
US Department of Energy	
Western Area Power Administration	
Colorado Department of Natural Resources (Division of Wildlife, State Parks, Natural Heritage Program, State Forest Service, Reclamation Division, Mining and Safety)	✓
Colorado Department of Transportation	
Colorado State Historical Preservation Office	
Colorado State Parks	
Delta County	✓
Gunnison County	✓
Mesa County	
Montrose County	✓
Ouray County	✓
San Miguel County	✓
City of Delta	
City of Montrose	✓
City of Ouray	
Town of Cedaredge	✓
Town of Crawford	
Town of Hotchkiss	✓
Town of Mountain Village	✓
Town of Naturita	
Town of Norwood	✓
Town of Nucla	✓
Town of Olathe	✓

Table 1-4 *(continued)*
Cooperating Agency Participation

Agencies and Tribes Invited to be Cooperators	Accepted as of July 2010
Town of Orchard City	✓
Town of Paonia	✓
Town of Ridgway	✓
Town of Sawpit	
Town of Telluride	
Navajo Nation	
Northern Ute Indian Tribe	
Southern Ute Indian Tribe	
Ute Mountain Ute Indian Tribe	

1.5.5 Collaboration and Consultation with Tribes

The UFO has initiated consultation with tribes that are identified as having interests or Traditional Cultural Properties in the planning area. Consultation will be that required by the National Historic Preservation Act and the American Indian Religious Freedom Act. The identified tribes are Northern Ute, Southern Ute, and Ute Mountain Ute.

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.

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CHAPTER 2
COMMENT SUMMARY

2.1 METHOD OF COMMENT COLLECTION AND ANALYSIS

All written submissions received on or before April 9, 2009, were evaluated and are documented in this Scoping Summary Report. All comments received during the RMP process will be considered in alternative formulation and project planning.

A total of 214 unique written submissions, resulting in 2,496 unique comments, were received during the public scoping period. The most common format used for submissions was electronic mail. Submissions were also hand-delivered to the UFO, mailed via US Mail, or faxed. In addition, comment forms were completed at the public scoping meetings.

In addition to unique submissions, letter campaigns from non-profit organizations and individuals resulted in form letter submissions for a number of topics. Details of form letter submission are included in **Appendix B** (List of Commenters), **Table B-2**, Form Letter Submissions. Letters that represented slight variations of the form letter without significant additional information were treated as form letters. When significant unique comments were added to the form letter, these comments were entered into the comment-tracking database. In total, 13 different form letters were received. Out of the 13 form letters, 11 were submitted by between 2 and 28 people. The remaining 2 letters were submitted by more substantial numbers of people; a letter campaign by The Wilderness Society resulted in 20,831 electronic submissions, and 117 submissions resulted from a letter campaign by Citizens for a Healthy Community. Form letters are not included in the calculations of affiliation and geographic location percentages.

A list of commenters and the dates of submittal are provided in **Appendix B**, List of Commenters. Most written submissions included more than one comment, so the 214 submissions and form letters yielded 2,496 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. One comment was submitted anonymously.

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:

1: Issues that will be resolved in the RMP;

2: Issues that will be addressed through BLM policy or administrative action (National and BLM policy);

3: Issues that are beyond the scope of this RMP that will be considered but not addressed; and

4: Issues that have already been addressed by the UFO but should be better communicated to the issue holder.

To assist with the analysis, the BLM entered comments into the Public Input and Comment Tracking database and organized comments by planning issue categories and affiliation of the commenter. Finally, these identifiers were queried and tallied to provide information on planning and other issue categories. Details of comments received by planning issue are included in **Section 2.2.4**, Number of Comments by Planning Issue Category.

2.2 SUMMARY OF PUBLIC COMMENTS RECEIVED

2.2.1 Written Submissions by Affiliation

Table 2-1, Comments by Commenter Affiliation, and **Figure 2-1**, Comments by Commenter Affiliation, show the number and proportion of written submissions received from each type of affiliation. Letters on business, agency, or organization letterhead, or where the commenter 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 72.4 percent of the comments received during the scoping period, representatives from businesses submitted 8.4 percent, and non-profit or citizen groups submitted 10.7 percent. Federal agencies submitted 5 written submissions (2.3 percent), state agencies submitted 5 written submissions (2.3 percent), and local governmental agencies submitted 7 written submissions (3.3 percent), for a total of 7.9 percent of the submissions from government. No written submissions were received from tribal governments or organizations or elected officials. A list of commenters, their affiliations, and the submittal date of their comments are listed in **Appendix B**, List of Commenters.

2.2.2 Written Submissions by Geographical Area

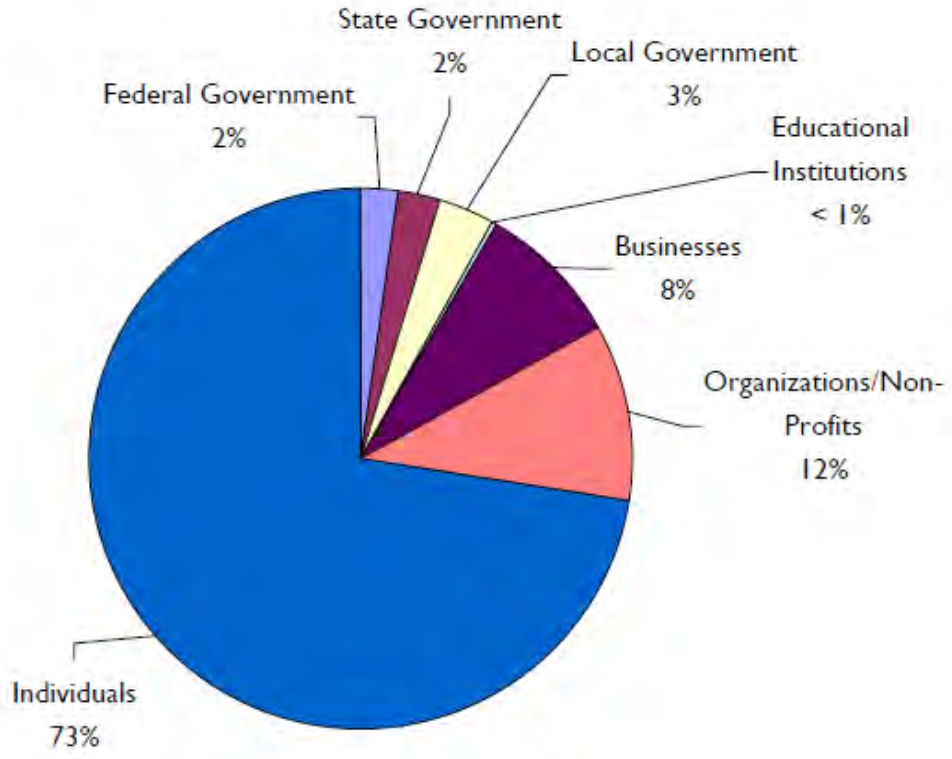
Table 2-2, Commenters by Geographic Area, and **Figure 2-2**, Commenters by Geographic Area, show the number and proportion of written submissions received by the geographic location of the sender. A total of 140 commenters (67.3 percent) were from counties within the planning area. Of the remaining submissions, 29 (13.9 percent) were from commenters in other counties in Colorado, primarily on the Front Range. Seven commenters (3.4 percent) were from other states. Ten (15.4 percent) of the 32 written submissions received did not indicate a geographic origin. Note that these calculations do not include form letters submissions. In

Table 2-1
Comments by Commenter Affiliation[1]

Affiliation	Number of Comment Letters	Percentage of Total Comment Letters
Government	17	7.9
Federal	*5*	*2.3*
State	*5*	*2.3*
Local	*7*	*3.3*
Educational Institutions	1	0.5
Businesses	18	8.4
Organizations/Non-profits	23	10.7
Individuals	155	72.4
Total	**214**	**100**

[1]Calculations do not include form letters submissions.

Figure 2-1
Comments by Commenter Affiliation[1]



[1]Calculations do not include form letters submissions.

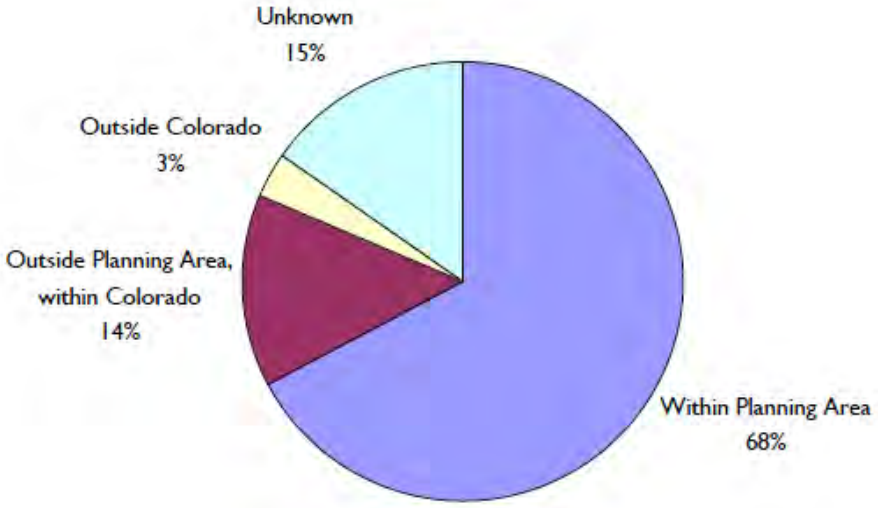
addition, some commenters made multiple submissions and some letters had more than one signatory, therefore the total for commenters by geographic area is not equal to the total letter submissions.

Table 2-2
Commenters by Geographic Area[1]

Location	Number of Commenters	Percentage of Total Commenters
Within Planning Area	140	67.3
Outside Planning Area, within Colorado	29	13.9
Outside Colorado	7	3.4
Unknown	32	15.4
Total	**208**	**100**

[1]Calculations do not include form letters submissions.

Figure 2-2
Commenters by Geographic Area[1]



[1]Calculations do not include form letters submissions.

Commenter location within the planning area was further examined by city of commenter. In the planning area, Montrose (21.4 percent), Paonia (16.4 percent), Nucla (12.9 percent), Hotchkiss (11.4), and Delta (10.7 percent) had the highest number of commenters. Refer to **Table 2-3**, Commenter Location within the Planning Area.

Table 2-3
Commenter Location within the Planning Area[1]

Location	Number of Commenters	Percentage of Total Commenters
Montrose	30	21.43
Paonia	23	16.43
Nucla	18	12.86
Hotchkiss	16	11.43
Delta	15	10.71
Ridgway	10	7.14
Austin	6	4.29
Crawford	4	2.86
Naturita	4	2.86
Telluride	4	2.86
Norwood	3	2.14
Somerset	3	2.14
Olathe	2	1.43
Cedaredge	1	0.71
Paradox	1	0.71
Total	**140**	**100**

[1]Calculations do not include form letters submissions.

2.2.3 Number of Comments by Process Category

Table 2-4, Comments by Process Category, shows the number of issues raised that will or will not be addressed in the RMP. Of the 2,496 comments received, 2,176 (87.2 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, 63 comments (2.5 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 3.3.7**, Other Issues to Be Addressed in the RMP). The remaining 10.3 percent of the comments were: 1) issues beyond the scope of the RMP (2.5 percent); 2) issues that will be resolved through national policy or administrative action (0.8 percent); or 3) comments related to implementation-level decisions (1.6 percent). See **Section 3.4**, Issues That Will Not Be Addressed in the RMP, for more detail.

Comments are provided in **Appendix C**, Comments by Resource Planning Issue. Comment letters can be viewed in their entirety at the UFO in Montrose, Colorado.

Table 2-4
Comments by Process Category

Process Category Code	Percent of Comments	Number of Comments
General comment related to project	7.9	197
Planning issue	87.2	2,176
General issue beyond the scope of the RMP	2.5	63
Implementation-level decisions	1.6	40
Issue resolved through national policy	0.8	20
Total	**100**	**2,496**

2.2.4 Number of Comments by Planning Issue Category

Table 2-5, Comments by Planning Issue, show the number and proportion of comments received by planning issue category. The BLM received 2176 planning issue comments and categorized them into the 6 planning issue categories and the appropriate sub categories. **Section 3**, Issue Summary, provides a detailed analysis of the comments received for each planning issue category and subcategory.

Of the planning issue comments, 942 (43.3 percent) related to those in Issue 1, natural resource management. Within this category, the most comments were received for special designation areas (664 comments, 30.5 percent of planning issue comments). The Issue with the second highest number of comments was Issue 3, management of human activities, with 660 comments (30.3 percent). In this category, Recreation (300 comments, 13.8 percent of planning issue comments) and Travel Management (243 comments, 11.2 percent of planning issue comments) received the most comments. Planning Issue 2, concerned with energy development and mineral extraction, received the third highest number of comments with 410 (18.9 percent of planning issue comments). Issue 6, concerned with social and economic considerations and public health, received 72 comments (3.3 percent of planning issue comments). Issue 4, Lands and Realty, received 71 comments (3.3 percent). Finally, Issue 5, cultural resources, received the fewest comments with 20 (0.9 percent of planning issue comments).

Table 2-5
Comments by Planning Issue

Planning Issue and Subcategory	Number of Comments	Percent of Comments
ISSUE 1	**942**	**43.3**
All Water, Air and Soil	85	3.9
Geology and Soils	*5*	*0.2*
Air Quality	*30*	*1.4*
Water Resources	*50*	*2.3*
All Special Status Species	32	1.5
Special Status Fish	*5*	*0.2*

Table 2-5 *(continued)*
Comments by Planning Issue

Planning Issue and Subcategory	Number of Comments	Percent of Comments
Special Status Plants	*5*	*0.2*
Special Status Species General	*15*	*0.7*
Special Status Wildlife	*7*	*0.3*
All Special Designation Areas	664	30.5
Special Designation Areas General	*24*	*1.1*
Areas of Critical Environmental Concern	*38*	*1.7*
Wild and Scenic Rivers	*314*	*14.4*
Wild and Scenic Rivers in Dominguez-Escalante NCA	*22*	*1.0*
Wilderness and Wilderness Study Areas	*251*	*11.5*
Wilderness Characteristics	*8*	*0.4*
National Trails and Byways	*7*	*0.3*
All Vegetation	79	3.6
Vegetation (general comments)	*43*	*2.0*
Weeds	*25*	*1.1*
Wetland and Riparian Areas	*11*	*0.5*
Fish and Wildlife	68	3.1
Drought Management and Climate Change	14	0.6
ISSUE 2	**410**	**18.9**
Energy Development (general comments)	99	4.6
Non-renewable Energy Development	225	10.3
Minerals and Mining	72	3.3
Renewable Energy Development	14	0.6
ISSUE 3	**660**	**30.3**
Recreation	300	13.8
Travel Management	243	11.2
Noise	4	0.2
Visual Resources	22	1.0
Forestry	16	0.7
Livestock Grazing	64	2.9
Fire Management	11	0.5
ISSUE 4	**71**	**3.3**
Lands and Realty	71	3.3
ISSUE 5	**20**	**0.9**
Cultural and Heritage Resources	18	0.8
Paleontological Resources	2	0.1

Table 2-5 *(continued)*
Comments by Planning Issue

Planning Issue and Subcategory	Number of Comments	Percent of Comments
ISSUE 6	**72**	**3.3**
Social, Economic, and Environmental Justice Concerns	62	2.9
Public Health and Safety	10	0.5

CHAPTER 3
ISSUE SUMMARY

Issue identification is the first of the nine-step BLM planning process. As defined in the BLM Land Use Planning Handbook (H-1601-1) (BLM 2005), 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 PLANNING ISSUE DEVELOPMENT

The BLM enacted a multi-step issue identification process for the Uncompahgre RMP planning effort. The process began with the creation of a Preparation Plan for the Uncompahgre RMP/EIS in January 2008. This plan, used by the interdisciplinary team to begin the planning process, summarized the purpose of 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.

Public scoping began with the release of the first project newsletter in December 2009, followed by scoping workshops in January and February 2010. In February 2010, the BLM issued the Notice of Intent to prepare the RMP, which initiated the formal scoping period as required by NEPA, and solicited written comments from the public (further discussed in **Section 1.4**, 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 **Section 1.5**, Collaborative Involvement Process. The BLM hosted seven 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.

Information accepted during 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**, Summary of Public Comments by Resource Planning Issue Category, according to the various issue categories and associated comments received from interested individuals, agencies, elected officials, businesses, and organizations. 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.

3.2 PLANNING ISSUE STATEMENTS

A planning issue is a conflict or dispute over resource management activities, allocations, or land use that is well defined or topically discrete and entails alternatives between which to choose.

The planning issue statements presented below are preliminary and are based on the best information known to date. The process of developing this RMP will afford many opportunities for collaboration with local, state, federal, and tribal governments; land-management agencies; public interest groups; and public land users. As a result, these issues and concerns may need to be modified and perfected to reflect public comments and concerns. The overarching planning issues the UFO will address in the plan are listed below. Each overarching issue, in turn, has several sub-topics, issue questions, and management concerns which address more specific uses and resources. As applicable, items listed in Appendix C of the Land Use Planning Handbook (H-1601-1) (BLM 2005) will be addressed and decisions will be made. Planning issue statements include the following:

- Issue 1. How will vegetative resources, terrestrial and aquatic habitat, water resources, and special management areas be managed, while maintaining biological diversity and native species populations?
- Issue 2. How will energy and minerals resources be managed?
- Issue 3. How will human activities and uses be managed?
- Issue 4. How will land tenure, withdrawals, and utility/energy corridors be managed or adjusted?
- Issue 5. How will cultural, historical and paleontological resources and Native American religious concerns be managed and protected?
- Issue 6. How do population growth and an expanding urban interface affect the management of public lands and resources, including authorized and permitted land uses, while considering community values and needs?

Each planning issue as defined above encompasses a number of subcategories. Comments received during the public scoping period were classified into these subcategories as follows:

Issue 1: How will vegetative resources, terrestrial and aquatic habitat, water resources, and special management areas be managed, while maintaining biological diversity and native species populations?

- Soil, air, and water resources

- Special management areas, including Areas of Critical Environmental Concern (ACEC), wild and scenic rivers, wilderness, and Wilderness Study Areas
- Vegetation, including riparian and wetland areas and noxious weeds
- Fish and wildlife
- Special status species
- Drought management and climate change

Issue 2: How will energy and minerals resources be managed?

- Non-renewable energy development (e.g., oil and gas, coal)
- Renewable energy development
- Minerals and mining (locatable minerals and saleable mineral materials)

Issue 3: How will human activities and uses be managed?

- Recreation
- Travel management
- Livestock grazing
- Visual resources
- Noise
- Forestry
- Wildland fire management

Issue 4: How will land tenure, withdrawals, and utility/energy corridors be managed or adjusted?

- Lands and realty

Issue 5: How will cultural, historical, and paleontological resources and Native American religious concerns be managed and protected?

- Cultural resources and heritage resources
- Paleontological resources
- Native American religious concerns

Issue 6: How do population growth and an expanding urban interface affect the management of public lands and resources, including authorized and permitted land uses, while considering community values and needs?

- Socioeconomic and environmental justice concerns
- Public health and safety

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.

3.3 SUMMARY OF PUBLIC COMMENTS BY RESOURCE PLANNING ISSUE CATEGORY

Each comment received during public scoping was reviewed and coded. Of the 2,496 comments received, 2,176 comments (87.2 percent) were related to one of the planning issues defined above. In addition, 197 comments (7.9 percent) were related to issues that will be addressed in the RMP but do not fall within a specific planning issue category. See **Table 2-5**, Comments by Planning Issue, for a breakdown of the number of comments received for each planning issue and subcategory. Summaries of the scoping comments received for each planning issue category, as well as general RMP comments, are provided in **Sections 3.3.1**, Issue 1, through **3.3.7**, Other Issues to Be Addressed in the RMP, below. These summaries provide details only on comments related to issues that will be resolved in the RMP. Tables with all comments for each planning issue, as well as tables for issues that will not be addressed in the RMP, are included in **Appendix C**, Comments by Resource Planning Issue. 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 Issue 1

Soil, Air, and Water Resources

Eighty-five comments were received about air, soil, and water issues, representing 3.9 percent of the comments received on planning issues. Comments are included in **Appendix C** (Comments by Resource Planning Issue), **Table C-5**, Air Quality, Water and Soil

Fifty comments were received on water resources issues (2.3 percent of planning issue comments). Concerns included salinity and selenium control, impacts to surface and ground water quality and quantity from development activities, water rights, source protection for drinking and irrigation water, and management for healthy watersheds.

Five comments were received on soil and geology issues, representing approximately 0.2 percent of the total planning issue comments. Comments primarily related to concerns about soil erosion.

Thirty comments were received about air quality in the planning area, representing 1.4 percent of the total planning issue comments. The US Environmental Protection Agency, San Miguel County Commissioners, Trout Unlimited, and the Wilderness Society all urged the BLM to thoroughly address air quality issues in the RMP. The majority of the commenters requested monitoring and evaluations of air quality in the planning area. Additionally, commenters requested that the expertise, technology, and software to analyze air quality are present to ensure proper baseline data. Commenters were particularly concerned with the contribution of oil and gas production to local air pollutants. In addition, multiple comments requested additional dust-minimization requirements or best management practices.

Special Management Areas, Including Areas of Critical Environmental Concern, Wild and Scenic Rivers, Wilderness, and Wilderness Study Areas

Six hundred sixty-four comments (30.5 percent of the total planning issue comments received) were about special designations; see **Appendix C** (Comments by Resource Planning Issue), **Tables C-10** Special Designation Areas – General to **C-13** Special Designation Areas – Wilderness, Wilderness Study Areas, Lands with Wilderness Characteristics for comments. Special designation area comments pertained to ACECs, wild and scenic rivers, backcountry byways, and National Historic Trails. Wilderness Study Areas and wilderness comments, including those on areas with wilderness characteristics, were also included in this section. In total 24 comments were received for non-specific special management area concerns. In general individuals opposed to additional special designation areas cited conflicts with uses such as energy development, recreation, and the associated impacts on the local economy. Those in favor of additional areas requested more protection to preserve wild places and areas with sensitive resources.

A total of 38 comments (1.7 percent of planning issue comments) were received on ACEC issues. Multiple commenters urged the UFO to offer maximum protection for all ACECs and continue to identify and protect other imperiled areas. One state government agency, environmental groups, and some individuals urged the BLM to expand areas protected under special designation status. The Colorado Natural Heritage Program recommends that the BLM retains the ACEC designations for both existing ACECs and that 2 potential conservation areas receive ACEC status. Trout Unlimited stated support for re-affirmation of ACECs at Adobe Badlands, Needle Rock, Fairview, and San Miguel. Other recommended additions or expansions include expanding the Fairview South ACEC to include all populations of Clay-loving wild buckwheat, expanding the San Miguel ACEC, and adding ACECs in areas with archeological significance or important habitat for particular species, including Gunnison and white-tailed prairie dog, Gunnison sage grouse, and Paradox Valley lupine. Individuals and environmental groups also called for the limitation of oil, gas, and mineral leasing in ACECs. Commenters from a recreation group asked that the UFO consider use of designated trails and other measures to limit impacts on ACECs rather than close access and to be cautious of being unduly influenced from the anti-motorized community in protecting significant values.

The wild and scenic rivers study process was mentioned in 314 comments (14.4 percent of planning issue comments). Commenters discussed the eligibility findings in the draft eligibility report. Multiple comments were received opposing the designation of additional wild and scenic rivers in the planning area and to the eligibility findings in the draft report in particular, to the findings of Escalante Creek and the San Miguel River as eligible for wild and scenic river status. Commenters state that the historic land uses, such as farming and ranching, and local economies would suffer from additional restrictions on these rivers. Conversely other commenters supported the eligibility findings in the draft eligibility report. Multiple comments were received noting the importance of protecting the Dolores River in particular. An additional 22 comments (1 percent of the planning issue comments) were related to wild and scenic rivers for segments in the Dominguez-Escalante NCA. Additional comments related either to general background information, management of eligible or suitable segments, or suitability. Some comments also proposed alternative management strategies to wild and scenic river listings to manage planning area rivers. It should also be noted that the wild and scenic river eligibility and suitability

designation process was the primary subject of 4 of the 13 form letters received during the scoping period, with letters both in favor and opposed to designation of area rivers as eligible or suitable for wild and scenic river status.

Seven comments were received on national scenic byways, representing .3 percent of planning issue comments. Representatives of the West Elk Loop Scenic and Historic Byway asked the BLM to recognize the byway as a state designated Byway in the RMP revision. These representatives also ask that the byway remain relatively natural in appearance, including the viewshed. A corridor along the road was requested for portions of the project area.

Two hundred fifty-one comments (11.5 percent) were received about Wilderness Study Areas and wilderness. An additional 8 comments (.4 percent) were received for lands with wilderness characteristics. Non-Profit organizations and some individuals expressed the desire for the BLM to appropriately protect existing Wilderness Study Areas and lands with wilderness characteristics and to consider and evaluate additional lands for wilderness characteristics. Areas specifically discussed include Roubideau (Camel Back), Adobe badlands, Sewemup Mesa, Norwood Canyon, and Dolores River Canyon. The Wilderness Society stated that the current regulations prohibiting the addition of Wilderness Study Areas do not preclude the BLM from an obligation to protect lands. In addition they provided management suggestions for these areas including the limitation of energy development, transmission lines, and motorized recreational use. Some individuals expressed the desire to restrict the management of lands with wilderness characteristics to the currently specified areas, others questioned the validity of the current classifications. These commenters cited the public use mandate and limitations to recreation and potential economic impacts as reasons to limit expansion.

Vegetation, Including Wetlands, Riparian areas, and Noxious Weeds

Forty-three comments (2.0 percent of planning issue comments) were received regarding general vegetation concerns, and an additional 25 comments (1.1 percent of planning issue comments) were received for noxious weeds and 11 comments (0.5 percent of planning issue comments) for riparian and wetland areas. Comments are included in **Appendix C** (Comments by Resource Planning Issue), **Table C-8**, Vegetation. Commenters included individuals, environmental groups, and the US Environmental Protection Agency. Comments included concerns over the spread of noxious weeds such as Russian knapweed, cheatgrass, and tamarisk. Alternatives to aerial spraying for weed control were requested and support for the controlled use of fire as a vegetation management tool was voiced. Several comments were related to having a balance of seral stages and age classes as seen in pre-settlement times. The importance of later seral stage growth, including in pinyon juniper habitat, was also noted. Commenters urged the BLM to actively manage the land for optimum conditions, noting that these conditions will not only improve habitat for wildlife but also reduce the risk of wildfire risk. In addition, individuals, the US Environmental Protection Agency, and environmental organizations all requested that riparian and wetland areas be given special protection in the RMP. Suggested protection measures included limitations on livestock grazing, trail and road development, and energy development

Fish and Wildlife

Sixty-eight comments were received on this issue, which represents 3.1 percent of the total number of planning issue comments received. See **Appendix C** (Comments by Resource Planning Issue), **Table C-7**, Fish and Wildlife, for representative comments. Individuals, environmental organizations, and government entities, including the US Environmental Protection Agency and the town of Ridgway, expressed support for the protection of wildlife habitat. Commenters asked that the BLM consider management at the landscape scale. Others listed specific habits and populations to protect and manage. Commenters also asked that the BLM utilize the best available science to determine essential habitat areas to protect and best management practices that should be incorporated. These respondents also expressed concerns about conflicts between protection for wildlife and other land uses, such as recreation and oil and gas development.

Special Status Species

Individuals, environmental groups, and one state agency commented on the management of listed species or candidates for listing at the agency, state, or federal level. Thirty-two comments were received, about 1.5 percent of the total planning issue comments. Comments are included in **Appendix C** (Comments by Resource Planning Issue), **Table C-9**, Special Status Species. The majority of commenters expressed concern for the continued existence or preservation of habitat for a particular species or group of species. The Gunnison's sage grouse was a species of concern for many commenters; comments included suggestions of management practices, such as the adoption of the statewide Gunnison Sage Grouse Conservation Plan, as well as recommended habitat areas to protect. Other species mentioned in multiple comments included burrowing owls, white-tailed and Gunnison's prairie dogs, sage grouse, multiple aquatic species, including the Colorado cutthroat trout, and Clay-loving buckwheat (*E. pelinophilum*). Commenters also asked that ACECs and other special management areas and tools be utilized to protect rare plant and animal habitat.

Drought Management/Climate Change

Fourteen planning issue comments, (.6 percent) related to issues of drought management or climate change. Comments are included in **Appendix C** (Comments by Resource Planning Issue), **Table C-6**, Drought Management/Climate Change. Commenters included individuals and non-profit organizations. Most comments were general in scope and asked that the BLM take climate change into consideration in the RMP revision and consider the impacts of climate change for resources and resource uses such as water resources, fish and wildlife, vegetation management, wildland fire management, and livestock grazing,

3.3.2 Issue 2

Non-renewable Energy Development (Oil and Gas) and Minerals and Mining (Locatable Minerals and Saleable Mineral Materials)

The BLM received 99 comments on general energy development, 225 comments specifically related to non-renewable energy development, and 72 comments related to minerals and mining, comprising 4.6, 10.3, and 3.3 percent of total planning issue comments, respectively. Comments are included in **Appendix C** (Comments by Resource Planning Issue), **Table C-15**, Energy Development – General, **Table C-16** Non-renewable Energy Development, and **Table**

C-17 Minerals and Mining. Comments about energy development on BLM lands were mixed; many commenters supported such development, while some commenters opposed energy development. Most of the comments on energy development pertained to oil and gas, coal, or uranium development. Commenters had multiple affiliations, including individuals, environmental groups, energy companies, and one Colorado state agency.

Commenters in favor of and opposed to energy development on public lands stated the importance of careful consideration of energy development in the RMP. Many commenters stated that a reasonably foreseeable development would aid in the RMP revision.

Area energy development companies, including Nuvemco and West Elk Mines, and some individuals urged the BLM to allow for extraction of mineral resources in the project area. In addition, companies stated the importance of recognizing valid existing rights and the role of mining in the local economy.

Opposition to and concerns about the environmental effects of energy development were expressed by multiple individuals, one environmental group, and one Colorado state agency. Individuals and the environmental organization stated the need for the BLM to place limits on mining to protect water and air quality, fish and wildlife, and special designation areas. Commenters asked that the BLM analyze both long- and short-term impacts of energy development and address the need for remediation after extraction is finished. Multiple comments related specifically to uranium mining were concerned with the venting of methane gas from mines.

Renewable Energy Development

The BLM received 14 total comments on renewable energy development, comprising 0.6 percent of total planning issue comments. Comments are included in **Appendix C** (Comments by Resource Planning Issue), **Table C-18**, Renewable Energy Development. Some commenters requested that renewable energy development receive close examination and that stipulations and limitations similar to those used in oil and gas development should be employed as needed. In addition, commenters recommended that zones for renewable energy projects should be developed and that renewable energy development should be limited to those zones.

3.3.3 Issue 3

Recreation

At total of 300 comments (13.8 percent of planning issue comments) were received regarding recreation issues. Refer to **Appendix C** (Comments by Resource Planning Issue), **Table C-19**, Recreation Management. Commenters included individuals, representatives of recreational user groups, such as rock climbers, off-highway vehicle enthusiasts, and environmental organizations. The primary concerns expressed included continued access to and availability of recreation sites and recreational opportunities. Commenters stated the importance of continued access of motorized recreation to allow everyone, including those not physically capable of hiking, to experience the area. A related issue was conflict between different types of recreational users, especially motorized and nonmotorized uses. Numerous commenters expressed the importance of opportunities for quiet recreation on BLM lands and concern for resource degradation from

recreational activities. Additionally non-profit groups provided suggestions for management and regulations to reduce resource damage and user conflicts. A number of commenters expressed the importance of continued opportunities for hunting and fishing and target shooting in the planning area, while others stated the need to regulate activities for public safety and resource protection. The desire for additional dispersed camping and designated campground facilities was also expressed by some individuals, as was the importance of limitation on the locations of these activities. Standards for issuance of special recreation permits were also discussed in multiple comments.

Commenters provided detailed suggestions for the designation of Special Recreation Management Areas in particular areas in the planning area, notably Jumbo Mountain outside of the town of Paonia.

Travel Management

The BLM received 243 comments, or 11.2 percent of the total comments received on planning issues, on travel management and transportation issues. Comments are included in **Appendix C** (Comments by Resource Planning Issue), **Table C-20**, Travel Management. Commenters included numerous individuals, environmental organizations, the US Environmental Protection Agency, local town and government groups, and representatives of recreational user groups. It should be noted that travel management planning will be addressed outside of the Uncompahgre RMP revision effort. One issue discussed by respondents was the decision to complete comprehensive travel management planning separately from the RMP revision. The Wilderness Society suggested that the RMP should include a discussion of the criteria to be utilized in travel management planning decision.

Commenters asked that the BLM work with local stakeholders in the travel management process; one comment requested quarterly meeting with the off-highway vehicle community, and other suggestions included seeking input from local communities and other land management agencies such as the US Forest Service and US Bureau of Reclamation.

Multiple commenters noted the importance of establishing a true and accurate inventory of existing trails, roads, and pathways to aid in future travel management planning decisions. Another primary concern of commenters related to use designations on particular routes and trails, specifically which routes should be designated for motorized versus nonmotorized use, and which routes should be closed versus open. Conflicts between motorized and nonmotorized users for particular trails or areas were also discussed. Some respondents were concerned about the BLM limiting access to public lands. Comments stated that closing trails would limit recreational opportunities or access for development. Conversely, other commenters noted the importance of roadless areas and requested limits on roads and trail development.

Another primary issue was habitat degradation due to unregulated use of trails and roads, redundant routes, and user-created routes. Concerns included the impacts on wildlife and sensitive plant and animal species. The US Environmental Protection Agency requested that the RMP address water quality and fish and wildlife concerns. Other resource concerns include the spread of noxious weeds and erosion. Commenters also asked that sensitive areas be examined

and closed to motorized, mechanized, or all uses as needed to protect resources. In addition, the Rocky Mountain Recreation Initiative and others stated specific concerns about road density and urged the BLM to include an analysis of road and trail density in travel management analysis.

Livestock Grazing

Sixty-four planning issue comments were received about livestock grazing, range health, or upland management, representing 2.9 percent of the comments received on planning issues. Comments are included in **Appendix C** (Comments by Resource Planning Issue), **Table C-23**, Livestock Grazing. Commenters included individuals and ranch owners, as well as government agencies and non-profit organizations. Many comments supported the continuation of livestock grazing in the planning area. Commenters noted the importance of grazing for the local economies and the historic presence of grazing in the area. The San Miguel County Commissioners requested that the BLM commit more resources to ongoing monitoring of their lands to ensure achievement of the BLM Standards for Public Land Health (BLM 1997). Individuals and non-profit groups requested that riparian areas and special designation areas have limitations on livestock grazing and utilize best management practices to protect sensitive resources. Western Watersheds Project comments provided specific concerns about livestock grazing impacts and recommended methods of analysis to utilize in the EIS to determine the impacts of management decision on land health.

Visual Resources

Twenty-two comments (1.0 percent of planning issue comments) were related to visual resources. Refer to **Appendix C** (Comments by Resource Planning Issue), **Table C-22**, Visual Resources. Comments from individuals and non-profit groups asked that the BLM recognize the importance of viewsheds when making land management decisions in the RMP revision, including the impacts of energy development and recreation on viewsheds. Specific comments were provided for areas determined to have sensitive viewsheds. Commenters representing commercial interests stated that the disruptions to the natural viewshed from oil and gas and other development are temporary and that restrictions on development and recreation for visual concerns should not be overly restrictive.

Noise

Four planning issue comments (0.2 percent) were received related to noise. Comments are included in **Appendix C** (Comments by Resource Planning Issue), **Table C-21**, Noise. The Wilderness Society, Rocky Mountain Recreation Initiative, and Western Colorado Congress were concerned with the preservation of the natural soundscape and desired restrictions on activities, such as off-highway vehicle use, that would alter the quiet, natural environment.

Forestry

Sixteen comments (0.5 percent) were related to forestry management. Comments are included in **Appendix C** (Comments by Resource Planning Issue), **Table C-24**, Forestry. Commenters stated the importance of maintaining public access to forestry materials, especially firewood, poles, and posts. Additional comments related to the importance of forestry management for forest health and wildfire control.

Wildland Fire Management

Eleven comments (0.5 percent) related to wildland fire management. Comments are included in **Appendix C** (Comments by Resource Planning Issue), **Table C-25**, Wildland Fire Management. Numerous individuals, one recreation group, and one commercial business asked that the BLM actively address the management of fuels to prevent wildfire. Additionally, they ask that the RMP include a policy to continue fire use where it meets all resource objectives.

3.3.4 Issue 4

Lands and Realty

Approximately 3.3 percent of planning issue comments (71 comments) pertained to this issue category. Representative comments are included in **Appendix C** (Comments by Resource Planning Issue), **Table C-26**, Lands and Realty. Many comments referred to specific land tenure adjustment proposals or withdrawals. Comments from the US Bureau of Reclamation, San Miguel County, Town of Ridgway, and individuals all discussed particular parcels for disposal, for retention under BLM ownership, or for transfer to BLM ownership. The Wilderness Society and others recommended that the BLM should only pursue land tenure decisions if they support key values and resources, such as protecting ecologically important areas and providing open space. Additional commenters urged the BLM to recognize the valid exiting rights of area landowners.

Comments from energy and communications company representatives noted the importance of permitting for right-of-way corridors, electric transmission lines, pipelines for natural gas transportation, and other energy corridors, as well as access roads. These commenters stated that rights-of-way should receive high priority for consideration and that the BLM should work with companies and utilities to identify potential energy corridors. Additionally, some commenters noted that the West-wide Energy Corridors Programmatic EIS provides important information, but additional local information is needed to support that information.

3.3.5 Issue 5

Cultural, Heritage, and Paleontological Resources

Twenty comments were received on cultural, heritage, or paleontological resources, representing 0.9 percent of the planning issue comments received. Comments are included in **Appendix C** (Comments by Resource Planning Issue), **Tables C-27**, Cultural and Heritage Resources, and **C-28**, Paleontological Resources. Eighteen comments (0.8 percent) were received on cultural resource issues. Commenters recommended that the RMP preserve areas with cultural significance. Suggested protections include interpretive signs and limitations on development. Some commenters noted that public access to sites should be maintained to allow for enjoyment of the resource. Additional comments related to ACECs recommended the creation of additional special management areas to protect archeological resources. The two comments received related to paleontological resources stated the importance of preserving paleontological resources in the planning area. No comments were received related to Native American religious concerns.

3.3.6 Issue 6

Socioeconomic and Environmental Justice Concerns

Sixty-two comments on social and economic considerations were received, representing 2.9 percent of comments received on planning issues. Comments are included in **Appendix C** (Comments by Resource Planning Issue), **Table C-29**, Social and Economic Considerations. Commenters include individuals, one non-profit organization, local government representatives, and representatives of the oil and gas industry. Many comments were general in nature and requested that the BLM consider the impacts of the RMP on the local community. Numerous commenters stated the importance of energy development and extractive resources for local communities. Others mentioned the importance of tourism and recreation, as well as livestock grazing. Local government representatives recommended that the BLM work closely with area communities in developing the RMP revision. In addition, The Wilderness Society set out a detailed recommended approach for socioeconomic analysis.

Public Health and Safety

Ten comments were received related to issues of public health and safety, which represents 0.5 percent of the total planning issue comments. Comments are included in **Appendix C** (Comments by Resource Planning Issue), **Table C-30**, Public Health and Safety. A number of comments were received on the issue of dumping of trash materials on public lands. A number of individuals were also concerned about the health and safety issues related to oil and gas development and mining and associated waste material from these activities. In addition the US Environmental Protection Agency expressed concerns with this subject and advised the BLM to prepare a Health Impact Assessment as part of the EIS.

3.3.7 Other Issues to Be Addressed in the RMP

Of the 2,496 comments received, 87.2 percent were related to planning issues that will be addressed in the RMP (as discussed above). Another 197 comments (7.9 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. Comments are displayed in **Appendix C** (Comments by Resource Planning Issue), **Table C-4**, General Comments Related to the RMP.

3.4 ISSUES THAT WILL NOT BE ADDRESSED IN THE RMP

Approximately 4.9 percent of the comments related to issues that will not be addressed in the RMP. These include issues resolved through policy or administrative action, implementation issues that have already been addressed or will be addressed by the UFO independent of the RMP, and issues beyond the scope of the RMP that have been considered but will not be included. These comments are represented in **Appendix C** (Comments by Resource Planning Issue), **Table C-1**, General Comments Outside the Scope of the RMP, **Table C-2**, Comments Related to Issues to Be Solved by National Policy, and **Table C-3**, Comments Related to Implementation Actions.

Administrative or policy issue comments included issues pertaining to national BLM policy that will not be addressed during the Uncompahgre RMP process. Comments include the BLM

standards used to classify recreational areas, as well as policies for management of lands with wilderness characteristics.

Implementation issues that have been or will be addressed by the UFO outside of the RMP process include decisions that require on-the-ground action following the RMP decisions. Comments in this category include requests for additional facilities and signage at recreation areas. Other comments request completion of additional surveys and education of local communities and user groups.

Issues outside the scope of the RMP include comments about land management on areas outside the planning area. Examples include comments on management actions in the Gunnison Gorge or Dominguez-Escalante NCAs. This category also included comments on issues in which the BLM has limited or no administrative authority.

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 1989 and 1985 RMPs. 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 UFO. 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 UFO 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 2020.

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-level 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] [BLM 2005]). An example of an implementation decision is the development and management of a recreation site. They may be incorporated into implementation plans (activity or project plans) or may exist as stand-alone decisions.

These types of decisions require site-specific planning and NEPA analysis. 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]).

3.6 VALID EXISTING MANAGEMENT

The BLM-administered public lands in the planning area are managed with direction from the 1985 San Juan/San Miguel RMP (BLM 1985) and 1989 Uncompahgre Basin RMP (BLM 1989) and 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 1985 and 1989 RMPs, as amended. Determining which existing management decisions to carry forward is part of the planning process. 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 RMP will include a discussion of special designation areas including ACECs, Wilderness Study Areas, and national trails and byways. The Uncompahgre planning area has four ACECs designated, contains all or portions of four Wilderness Study Areas, and has one congressionally designated special area, the Tabeguache Area.

In addition, the RMP will address new special management areas designations. At the writing of this scoping report, the UFO has completed a draft wild and scenic rivers inventory, including identification of free-flowing segments and outstandingly remarkable values. As part of the RMP effort, UFO will finalize eligibility and potential classification and will determine suitability. While determining eligibility and suitability, UFO is working with two water roundtables, the San Miguel Watershed Coalition, and other interested parties.

New ACEC designations and management of lands with wilderness characteristics will also be considered in the development of the RMP. An ACEC report is currently being prepared by the UFO and will document the relevance and importance criteria findings of nominated ACECs. Its findings will be incorporated into the RMP alternatives. A report of lands with wilderness characteristics outside Wilderness Study Areas is scheduled for completion in summer 2010. The report will document the public lands within the planning area outside of Wilderness Study Areas that contain wilderness characteristics. Its findings will be incorporated into the RMP alternatives.

The Dominguez-Escalante and Gunnison Gorge NCAs are not included in the planning area and are covered under separate completed or to-be-completed management plans.

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CHAPTER 4
PLANNING CRITERIA

During its initial planning sessions, the BLM UFO 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. Planning criteria are based on standards prescribed by applicable laws and regulations; agency guidance; results of consultation and coordination with the public, other federal, state, and local agencies, and Indian tribes; analysis of information pertinent to the planning area; and professional judgment. The plan will be completed in compliance with the 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 UFO and presented for public comment. After public input is analyzed, the criteria become proposed criteria and can be added to or changed as the issues are addressed or as new information is presented. The UFO managers will approve the issues and criteria, along with any changes. Additional suggested criteria received in public scoping comments are provided in **Section 4.2**, Additional Suggestions for Planning Criteria.

4.1 PRELIMINARY PLANNING CRITERIA

- Where practicable and timely for the planning effort, current scientific information, research, and new technologies will be considered.
- The proposed RMP will comply with the FLPMA 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.
- Lands covered in the RMP will be public land and split estates managed by the BLM. No decisions will be made relative to non-BLM administered lands.

- 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 (BLM 2005), Appendix C.
- Broad-based public participation will be an integral part of the planning and EIS process.
- The planning team will work cooperatively with the State of Colorado, tribal governments, county and municipal governments, other federal agencies, the Southwest RAC, cooperating agencies, and all other interested groups, agencies, and individuals.
- Decisions in the plan will strive to be compatible with the existing plans and policies of adjacent local, state, and federal agencies, as long as the decisions are consistent with the purposes, policies, and programs of federal law and regulations applicable to public lands.
- The BLM will consult with the Colorado Division of Wildlife. 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.
- The BLM will recognize the State's responsibility for permitting related to oil and gas activities and in regulating air quality impacts.
- The 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 planning area public lands with sagebrush habitat.
- The RMP will recognize valid existing rights.
- The planning process will incorporate Colorado's Standards for Public Land Health and Guidelines for Livestock Grazing Management (BLM 1997).
- Wilderness Study Areas will continue to be managed under the Interim Management Policy for Lands under Wilderness Review (BLM 1995) until Congress either designates all or portions of the Wilderness Study Area 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 Wilderness Study Areas through the RMP process, or to manage any lands other than existing Wilderness Study Areas in accordance with the Interim Management Policy.
- 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 Freedom of Information Act requests (36 CFR 7.18).

- The RMP will include adaptive management criteria and protocol to deal with future issues.
- A reasonable foreseeable development scenario for fluid minerals, and reports for uranium and coal, will be developed from analysis of past activity, production, and other sources, which will aid in developing alternatives and in the environmental consequences analysis.

4.2 ADDITIONAL SUGGESTIONS FOR PLANNING CRITERIA

It was suggested that the planning criteria include the incorporation of the Colorado Cutthroat Trout Conservation Agreement or Strategy.

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CHAPTER 5
DATA SUMMARY/DATA GAPS

As part of the RMP planning, evaluation, and data-collection process, the BLM has inventoried available information and has identified data needs for energy development, recreation, socioeconomics, the potential designation of wild and scenic rivers and special designation areas, Class I cultural data, and Native American consultation. A summary is as follows:

- A draft oil and gas reasonably foreseeable development report will be completed in June 2010; its findings will be incorporated into the RMP/EIS.
- Recreation focus groups provide the public with an opportunity to tell the BLM which recreational places, activities, and outcomes are important and why. In February 2010, the BLM and Mesa State Natural Resource and Land Policy Institute held a series of these community-based meetings to better learn about and consider public perspectives regarding recreation across the planning area.
- Economic strategy workshops to complement the community assessment completed in 2009 (BLM 2009) were conducted in March 2010 to involve the local community in the land use planning process and to determine their visions for local economy and its tie to public land management.
- Wild and scenic rivers eligibility and suitability studies are underway to determine the suitability of eligible river segments within the planning area.
- Pending reports for other special designation areas include an ACEC report and a report on lands with wilderness characteristics outside of Wilderness Study Areas.
- A Class I cultural resources survey is underway. Issues and management considerations provided in this survey will be included in the RMP.
- Information obtained in the ongoing Ute Ethnohistory Project, conducted in coordination with the BLM Grand Junction and Glenwood Springs Field Offices, and through additional tribal consultation, will be used in formation of management alternatives in the RMP.

Both new data and existing resource information will be used in formulating resource objectives and management alternatives in the RMP. To facilitate this process, information is being compiled and put into digital format for use in analysis and map production using Geographic Information Systems. 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.

CHAPTER 6
FUTURE STEPS

6.1 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,** Summary of Public Comments by Resource 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 BLM's interdisciplinary team. In compliance with NEPA, CEQ regulations, and BLM planning regulations and guidance, alternatives should be reasonable and capable of implementation. The BLM will also meet with cooperating agencies, interested tribes, the RAC subgroup, 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 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 2012. 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 (http://www.uformp.com). 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 Uncompahgre RMP Web site (http://www.uformp.com). 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:

- Reviewing the progress of the RMP at the Uncompahgre RMP project Web site: http://www.uformp.com, 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 Uncompahgre RMP project mailing list in order to receive future mailings and information. (e-mail uformp@blm.gov)

Anyone wishing to be added to or deleted from the distribution list, wishing to change their contact information, or requesting further information may email a request to uformp@blm.gov or contact Mr. Bruce Krickbaum, RMP Project Manager, BLM, UFO, 2505 South Townsend Avenue, Montrose, CO 81401, phone 970-240-5300. Please provide name, mailing address, and e-mail address, as well as the preferred method to receive information.

CHAPTER 7
REFERENCES

BLM (US Department of the Interior, Bureau of Land Management). 1995. Handbook H-8550-1—BLM Interim Management Policy for Lands under Wilderness Review. BLM, Washington, DC.

_____. 1997. BLM Standards for Public Land Health and Guidelines for Livestock Grazing Management in Colorado. BLM, Colorado State Office, Lakewood, CO. February 3, 1997.

_____. 2005. Handbook H-1601-1—Land Use Planning Handbook. BLM, Washington, DC. March 11, 2005. 161 pp.

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Appendix A

Scoping Materials

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APPENDIX A
SCOPING MATERIALS

Public scoping for the Uncompahgre RMP/EIS has included a newsletter, seven scoping open houses, press releases, notices in local newspapers, and a public Web site, http://www.uformp.com. Although mailing of the newsletter in December 2009 initiated an informal scoping period, the formal public comment period as required by NEPA began on February 25, 2010, with the publication of a Notice of Intent in the *Federal Register*, and ended on March 29, 2010.

Information provided to the public during the public scoping period and a record of attendees at public meetings is included in this appendix. Material includes the following:

1. Notice of Intent
2. Project Newsletter 1
3. Press Releases
4. Newspaper Advertisement
5. Scoping Flyer
6. Scoping Comment Form

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The plat, in four sheets, representing the dependent resurvey and survey in Township 5 South, Range 13 West, of the Indian Meridian, accepted September 24, 2009, for Group 80 OK.

The plat, in three sheets, representing the dependent resurvey and survey, in Township 5 South, Range 15 West, of the Indian Meridian, accepted September 24, 2009, for Group 82 OK.

The plat, in two sheets, representing the dependent resurvey and survey, in Township 24 North, Range 2 East, of the Indian Meridian, accepted November 19, 2009, for Group 159 OK.

If a protest against a survey, as shown on any of the above plats is received prior to the date of official filing, the filing will be stayed pending consideration of the protest. A plat will not be officially filed until the day after all protests have been dismissed and become final or appeals from the dismissal affirmed.

A person or party who wishes to protest against any of these surveys must file a written protest with the New Mexico State Director, Bureau of Land Management, stating that they wish to protest.

A statement of reasons for a protest may be filed with the notice of protest to the State Director, or the statement of reasons must be filed with the State Director within thirty (30) days after the protest is filed.

FOR FURTHER INFORMATION CONTACT: These plats will be available for inspection in the New Mexico State Office, Bureau of Land Management, P.O. Box 27115, Santa Fe, New Mexico 87502–0115. Copies may be obtained from this office upon payment. Contact Marcella Montoya at 505–438–7537, or *Marcella_Montoya@nm.blm.gov,* for assistance.

Stephen W. Beyerlein,

Acting, Chief, Branch of Cadastral, Survey/GeoSciences.

[FR Doc. 2010–3828 Filed 2–24–10; 8:45 am]

BILLING CODE 4310–FB–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLCOS05000 2009]

Notice of Intent To Prepare a Resource Management Plan for the Uncompahgre Field Office and Associated Environmental Impact Statement

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of Intent.

SUMMARY: In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, and the Federal Land Policy and Management Act (FLPMA) of 1976, as amended, the Bureau of Land Management (BLM) Uncompahgre Field Office (UFO), Montrose, Colorado intends to prepare a Resource Management Plan (RMP) with an associated Environmental Impact Statement (EIS) for the UFO and by this notice is announcing the beginning of the scoping process to solicit public comments and identify issues. The RMP will replace the existing 1985 San Juan/San Miguel RMP and the 1989 Uncompahgre Basin RMP.

DATES: This notice initiates the public scoping process for the RMP and the associated EIS. Comments on issues and planning criteria may be submitted in writing until March 29, 2010

Scoping meetings were held recently in the following locations:
Hotchkiss, CO, January 12, 2010.
Delta, CO, January 13, 2010.
Montrose, CO, January 14, 2010.
Ridgway, CO, January 19, 2010.
Norwood, CO, January 20, 2010.
Naturita, CO, January 21, 2010.
Telluride, CO, February 3, 2010.
The dates and locations of all scoping meetings were announced 15 days in advance through local media, a newsletter and the BLM Web site at: *http://www.blm.gov/co/st/en/fo/ufo/uncompahgre_rmp.html.* Comments received during scoping meetings held in January and February, 2010 will be incorporated in the record and considered by the BLM. In order to be included in the Draft EIS, all comments must be received prior to the close of the 30-day scoping period. The BLM will provide additional opportunities for public participation upon publication of the Draft EIS.

ADDRESSES: You may submit comments on issues and planning criteria by any of the following methods:

- *Web site: http://www.blm.gov/co/st/en/fo/ufo/uncompahgre_rmp.html.*
- *E-mail: uformp@blm.gov.*
- *Fax:* (970) 240–5367.
- *Mail:* BLM Uncompahgre Field Office, RMP Project Manager, 2465 S. Townsend Ave., Montrose, Colorado 81401.

Documents pertinent to this proposal may be examined at the UFO during regular business hours (from 8 a.m. to 4:30 p.m. Monday through Friday, except holidays).

FOR FURTHER INFORMATION CONTACT: For further information and/or to have your name added to our mailing list, contact Bruce Krickbaum, RMP Project Manager, telephone (970) 240–5300; address BLM Uncompahgre Field Office 2465 South Townsend Ave, Montrose, Colorado 81401; e-mail *uformp@blm.gov.*

SUPPLEMENTARY INFORMATION: This document: provides notice that the BLM UFO, Montrose, Colorado, intends to prepare an RMP with an associated EIS for the UFO; announces the beginning of the scoping process; and seeks public input on issues and planning criteria. The planning area is located in Delta, Gunnison, Mesa, Montrose, Ouray and San Miguel counties, Colorado, encompasses approximately 675,677 acres of public land, and excludes the Gunnison Gorge National Conservation Area and the Dominguez-Escalante National Conservation Area, which are managed under separate RMPs.

The purpose of the public scoping process is to determine relevant issues that will influence the scope of the environmental analysis, including alternatives, and guide the planning process. Preliminary issues for the planning area have been identified by BLM personnel, Federal, State, and local agencies, and other stakeholders. The issues include:

- Managing vegetative and water resources, terrestrial and aquatic habitat and special management areas, while sustaining biological diversity and native species populations;
- Managing mineral, renewable and nonrenewable energy resources;
- Managing increasing numbers and types of human activities and uses;
- Managing land tenure adjustments, withdrawals and utility/energy corridors;
- Managing and protecting cultural, historical and paleontological resources and Native American religious concerns; and
- Managing public lands and resources, including authorized and permitted land uses, for a growing population and expanding urban interface, with consideration for community values and needs.

Preliminary planning criteria include:

- Compliance with the FLPMA, the NEPA and other applicable laws and regulations.
- Incorporation of the Colorado BLM Standards for Public Land Health.
- Continued management of Wilderness Study Areas under the Interim Management Policy for Lands under Wilderness Review until Congress acts on a designation or releases lands from consideration.
- Decisions will be made that affect all BLM lands, including the subsurface mineral estate, within the planning area.
- Recognition of valid existing rights.

• Inclusion of adaptive management criteria to deal with future issues.

Public participation will be encouraged throughout the process. The BLM will collaborate and build relationships with tribes, State and local governments, Federal agencies, local stakeholders and others within the community of interest for the RMP.

You may submit comments on issues and planning criteria in writing to the BLM at any public scoping meeting, or you may submit them to the BLM using one of the methods listed in the **ADDRESSES** section above. To be most helpful, you should submit comments within the 30-day scoping period. 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 you 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. The BLM will evaluate identified issues to be addressed in the plan and place them into one of three categories:

1. Issues to be resolved in the plan;

2. Issues to be resolved through policy or administrative action; or

3. Issues beyond the scope of this plan.

The BLM will provide an explanation in the Draft RMP/EIS regarding why an issue was placed in category two or three. The public is also encouraged to help identify any management questions and concerns that should be addressed in the plan. The BLM will work collaboratively with the interested parties to identify the management decisions that are best suited to local, regional, and national needs and concerns.

The BLM will use an interdisciplinary approach to develop the plan in order to consider the variety of resource issues and concerns identified. Specialists with expertise in the following disciplines will be involved in the planning process: Wildlife; Threatened and Endangered Species; Vegetation; Riparian and Wetlands; Soils; Invasive and Noxious Weeds; Rangeland Management; Fire Ecology and Management; Cultural Resources and Native American Concerns; Hydrology; Geology and Minerals; Lands and Realty; Recreation; Visual Resource Management; Public Safety; Law Enforcement; and Geographic Information Systems.

Authority: 40 CFR 1501.7 and 43 CFR 1610.2.

Dave Hunsaker,

Acting State Director.

[FR Doc. 2010–3846 Filed 2–24–10; 8:45 am]

BILLING CODE P

DEPARTMENT OF THE INTERIOR

National Park Service

Notice of Intent to Repatriate a Cultural Item: Peabody Museum of Archaeology and Ethnology, Harvard University, Cambridge, MA

AGENCY: National Park Service, Interior.

ACTION: Notice.

Notice is here given in accordance with the Native American Graves Protection and Repatriation Act (NAGPRA), 25 U.S.C. 3005, of the intent to repatriate a cultural item in the possession of the Peabody Museum of Archaeology and Ethnology, Harvard University, Cambridge, MA, that meets the definition of "unassociated funerary object" under 25 U.S.C. 3001.

This notice is published as part of the National Park Service's administrative responsibilities under NAGPRA, 25 U.S.C. 3003 (d)(3). The determinations in this notice are the sole responsibility of the museum, institution, or Federal agency that has control of the cultural items. The National Park Service is not responsible for the determinations in this notice.

The item is a coiled, cylindrical basket with black linear designs.

At an unknown date, this basket was collected by Grace Nicholson at an unknown locality, but likely in California. It was donated to the Peabody Museum by Lewis Farlow in 1905. Museum documentation states that this item was "rescued from pyral fire." The description of "pyral fire" indicates that this item was intended to be burned as part of a funeral rite. The Peabody Museum is not in possession of the human remains.

Museum documentation describes this item as "probably Moquelumnan stock." The term "Moquelumnan" was used to describe Miwok people. Consultation evidence indicates that present-day groups which represent Miwok people are the Buena Vista Rancheria of Me-Wuk Indians of California; California Valley Miwok Tribe, California; Chicken Ranch Rancheria of Me-Wuk Indians of California; Federated Indians of Graton Rancheria, California; Ione Band of Miwok Indians of California; Jackson Rancheria of Me-Wuk Indians of California; Shingle Springs Band of Miwok Indians, Shingle Springs Rancheria (Verona Tract), California; Tuolumne Band of Me-Wuk Indians of the Tuolumne Rancheria of California; United Auburn Indian Community of the Auburn Rancheria of California; and Wilton Rancheria, California.

Officials of the Peabody Museum of Archaeology and Ethnology have determined that, pursuant to 25 U.S.C. 3001 (3)(B), the one cultural item described above is reasonably believed to have been placed with or near individual human remains at the time of death or later as part of the death rite or ceremony and is believed, by a preponderance of the evidence, to have been removed from a specific burial site of an Native American individual. Officials of the Peabody Museum of Archaeology and Ethnology also have determined that, pursuant to 25 U.S.C. 3001 (2), there is a relationship of shared group identity that can be reasonably traced between the unassociated funerary object and the Buena Vista Rancheria of Me-Wuk Indians of California; California Valley Miwok Tribe, California; Chicken Ranch Rancheria of Me-Wuk Indians of California; Federated Indians of Graton Rancheria, California; Ione Band of Miwok Indians of California; Jackson Rancheria of Me-Wuk Indians of California; Shingle Springs Band of Miwok Indians, Shingle Springs Rancheria (Verona Tract), California; Tuolumne Band of Me-Wuk Indians of the Tuolumne Rancheria of California; United Auburn Indian Community of the Auburn Rancheria of California; and Wilton Rancheria, California.

Representatives of any other Indian tribe that believes itself to be culturally affiliated with the unassociated funerary object should contact Patricia Capone, Repatriation Coordinator, Peabody Museum of Archaeology and Ethnology, 11 Divinity Ave., Cambridge, MA 02138, telephone (617) 496–3702, before March 29, 2010. Repatriation of the unassociated funerary object to the Buena Vista Rancheria of Me-Wuk Indians of California; California Valley Miwok Tribe, California; Chicken Ranch Rancheria of Me-Wuk Indians of California; Federated Indians of Graton Rancheria, California; Ione Band of Miwok Indians of California; Jackson Rancheria of Me-Wuk Indians of California; Shingle Springs Band of Miwok Indians, Shingle Springs Rancheria (Verona Tract), California; Tuolumne Band of Me-Wuk Indians of the Tuolumne Rancheria of California; United Auburn Indian Community of the Auburn Rancheria of California; and Wilton Rancheria, California may

US Department of the Interior
Bureau of Land Management
Issue 1, December 2009

The Uncompahgre RMP Newsletter

Introduction

The Bureau of Land Management (BLM) Uncompahgre Field Office (UFO) is preparing a comprehensive Resource Management Plan (RMP) and associated Environmental Impact Statement (EIS). The RMP will be prepared as a flexible plan to allow evolving management to reflect the changing needs of the planning area over the next two decades. It will replace the current plans that were developed in 1985 and 1989. The BLM requests input from you to help identify issues and concerns within and adjacent to the planning area. Your input is also sought regarding the planning criteria that will be used to evaluate these issues.

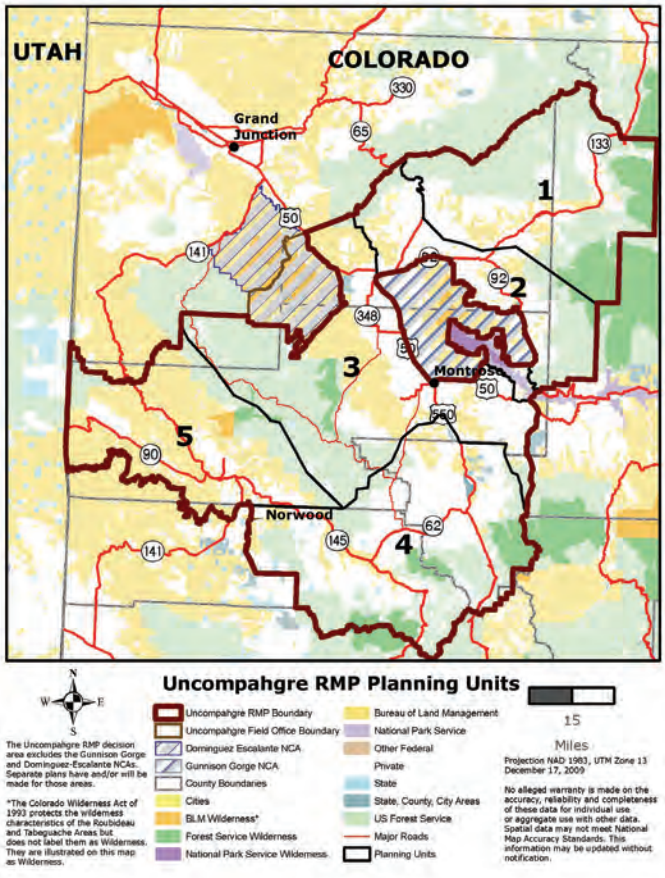
BLM Uncompahgre RMP Planning Area

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 district and field offices. The RMP is being prepared by the UFO in southwestern Colorado.

The boundary of the planning area encompasses lands in six Colorado counties (see map insert): Montrose, Delta, Mesa, Gunnison, Ouray, and San Miguel. Management direction outlined in the RMP will apply only to the approximately 675,000 acres of public land (surface) and 2.2 million acres of federal mineral estate (subsurface) within the planning area. The planning area excludes the Gunnison Gorge and Dominguez-Escalante National Conservation Areas.

The BLM-administered lands within the UFO are currently managed in accordance with the decisions in the San Juan/ San Miguel RMP (1985) and the Uncompahgre Basin RMP (1989).

Preparation of the Uncompahgre RMP is necessary in order to respond to changing resource conditions, new issues, and federal policies, as well as to prepare a comprehensive framework for managing public lands administered by the UFO. 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 San Juan/San Miguel and Uncompahgre Basin RMPs, as amended.



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Commonly Used Acronyms

BLM	Bureau of Land Management
EIS	Environmental Impact Statement
NOI	Notice of Intent
RAC	Resource Advisory Council
RMP	Resource Management Plan
UFO	Uncompahgre Field Office
WSA	Wilderness Study Area

What is an RMP?

An RMP, similar to a county master plan, 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:

- ✓ Establish goals and objectives for resource management and the measures needed to achieve them;
- ✓ 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 Uncompahgre RMP. This public scoping period gives the public and interested agencies and organizations the opportunity to provide comments on issues to be addressed and methods to be used in the RMP before BLM begins drafting it. The official scoping period will begin with the publication of the Notice of Intent (NOI) in the *Federal Register* and will continue for 60 days. During the scoping period, the BLM will host six public open houses in Hotchkiss, Delta, Montrose, Ridgway, Norwood, and Naturita. Notices providing information about these meetings will be published in local newspapers; also see page 4 of this newsletter.

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

- ✓ Attending one or more of the open house meetings (see back page) to learn about the project and planning process and to meet BLM representatives;
- ✓ Reviewing the progress of the RMP on-line at the Uncompahgre RMP Web site: *http://www.blm.gov/co/st/en/fo/ufo/uncompahgre_rmp.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; and
- ✓ Joining the Uncompahgre 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 uformp@blm.gov; or
  - – Contacting Bruce Krickbaum at (970) 240-5300.

Preliminary 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, or issue statements (see box below). We expect most public issues and concerns to fall within one of these statements; however, we do not presume that they are all-encompassing. The issue statements may be revised based on the comments we receive and new issue statements may be added. The BLM requests your comments on these or other issues on BLM-administered lands within the Uncompahgre planning area.

Issue Statements

Issue 1. *How will vegetative resources, terrestrial and aquatic habitat, water resources, and special management areas be managed, while maintaining biological diversity and native species populations?*

Issue 2. *How will energy and minerals resources be managed?*

Issue 3. *How will human activities and uses be managed?*

Issue 4. *How will land tenure, withdrawals, and utility/energy corridors be managed or adjusted?*

Issue 5. *How will cultural, historical, and paleontological resources and Native American Religious Concerns be managed and protected?*

Issue 6. *How do population growth and an expanding urban interface affect the management of public lands and resources, including authorized and permitted land uses, while considering community values and needs?*

BLM staff answer questions from the public during a public meeting.

Wild and Scenic Rivers

Notice of Availability of the Draft Wild and Scenic River Eligibility Study

Congress authorized the National Wild and Scenic Rivers (WSR) Act in 1968 to preserve certain rivers with outstanding natural, cultural, and recreational values in a free-flowing condition for the enjoyment of present and future generations. The WSR Act requires the BLM to assess river segments under its management as part of its land use planning (RMP) process. The study and designation of rivers consists of a multi-step process: **eligibility, suitability,** and **congressional action**. Only Congress or, in certain circumstances, the Secretary of the Interior, may designate a river for inclusion in the National Wild and Scenic Rivers System.

The first step in the WSR evaluation process is to determine which river segments meet eligibility criteria. A draft WSR Eligibility Study is available for review on the Uncompahgre RMP Web site: *http://www.blm.gov/co/st/en/fo/ufo/uncompahgre_rmp.html*. The eligibility report provides an inventory of the river and stream segments on BLM lands that are eligible for inclusion in the National Wild and Scenic Rivers System.

The draft report found 19 rivers and creeks separated into 28 segments eligible. In addition, the San Juan Public Lands Draft Land Management Plan identifies a segment of the Dolores River as eligible, a portion of which is managed by the UFO and will be evaluated during the suitability phase. Until a suitability study is completed, river segments determined to be eligible for inclusion in the National Wild and Scenic Rivers System are afforded interim protective management measures to protect their free-flowing nature and identified outstandingly remarkable values under BLM authorities.

At this stage, the BLM is specifically looking for information regarding free-flowing condition and outstandingly remarkable values, including vegetation, wildlife, cultural, recreation, hydrologic, geologic, and scenic. Comments are also welcome for segments not considered eligible. Comments on the draft report will be accepted through February 26, 2010, via the comment form included in this newsletter.

The second step in the WSR evaluation process is a suitability study that determines which, if any, of the eligible segments are suitable for inclusion in the National Wild and Scenic Rivers System based on criteria set forth in the WSR Act. The suitability process will begin in Spring 2010 and will involve an interdisciplinary study of each eligible segment. The public may provide the BLM additional information pertaining to the suitability criteria in order for the BLM to make an informed determination on the suitability of the eligible stream segments.

During RMP alternatives development, the BLM will consider alternative approaches to managing water-related values, recognizing that WSR designation may not be the only way to protect these values. The draft suitability study will be included in the Draft RMP/Draft EIS and made available for public comment at that time.

For more information on the WSR Act, designation into the National Wild and Scenic Rivers System, and many other management-related issues, visit *http://www.rivers.gov*.

Two segments of the Gunnison River were found eligible for inclusion in the National Wild and Scenic Rivers System.

Preliminary Planning Criteria

During its initial planning sessions, the Uncompahgre BLM 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 BLM requests your input and may modify these criteria based on your comments. For a complete list of criteria, please visit the Uncompahgre RMP Web site: *http://www.blm.gov/co/st/en/fo/ufo/uncompahgre_rmp.html*.

January 2010	January – February 2010	Spring 2010 – Fall 2011	Winter 2011 – 2012	Fall 2012	Spring 2013
NOI Published in *Federal Register*	Public Scoping	Formulate Alternatives and Prepare Draft RMP/ Draft EIS	Draft RMP/Draft EIS Available for 90-day Public Review & Comment	Proposed RMP/Final EIS Available for 30-day Public Review & Protest	Record of Decision & Approved RMP

Mark Your Calendar!
Upcoming Open Houses

Tuesday, January 12, 2010
4:30 to 7:30pm
Memorial Hall
175 N 1st Street, Hotchkiss, Colorado

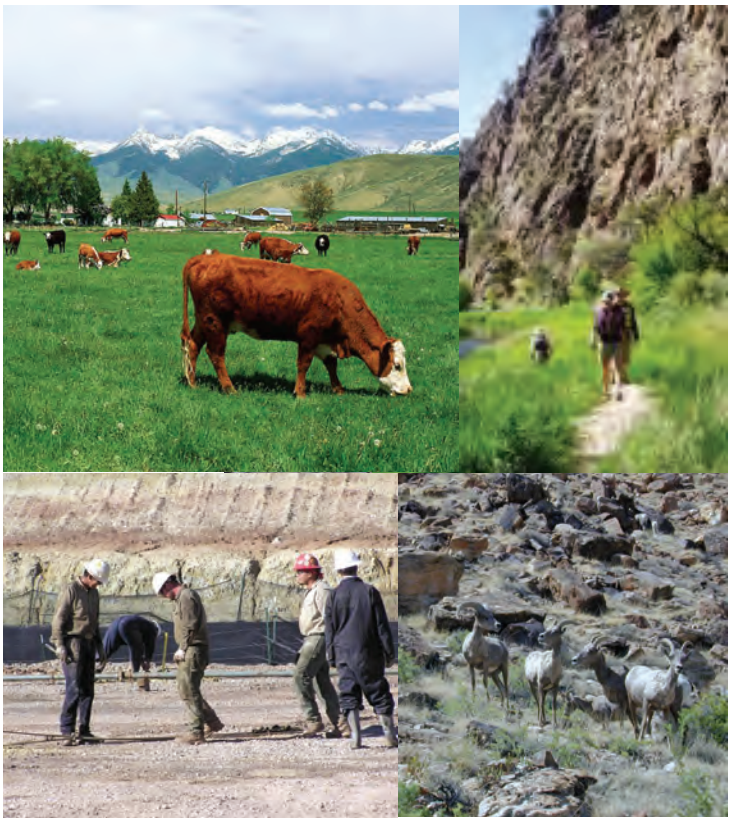
Wednesday, January 13, 2010
4:30 to 8:00pm
Bill Heddles Recreation Center
530 Gunnison River Drive, Delta, Colorado

Thursday, January 14, 2010
4:30 to 8:00pm
Montrose Pavilion
1800 Pavilion Drive, Montrose, Colorado

Tuesday, January 19, 2010
4:30 to 7:30pm
Ridgway Community Center
201 N Railroad Street, Ridgway, Colorado

Wednesday, January 20, 2010
4:30 to 7:30pm
Norwood Town Hall
1670 Naturita Street, Norwood, Colorado

Thursday, January 21, 2010
4:30 to 7:30pm
Naturita Library
411 W 2nd Avenue, Naturita, Colorado



The BLM must plan and manage for multiple uses on public lands.

To conserve paper, may we e-mail you future newsletters?
If so, please e-mail us at uformp@blm.gov.

US Department of the Interior
Bureau of Land Management
Uncompahgre Field Office
2465 S. Townsend Ave.
Montrose, CO 81401

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BLM Uncompahgre Field Office
RMP/EIS Newsletter

How to contact us

For more information, visit our Web site: http://www.blm.gov/co/st/en/fo/ufo/uncompahgre_rmp.html

With questions about the RMP or to be added to or removed from the mailing list, contact:
Mr. Bruce Krickbaum
Bureau of Land Management
Uncompahgre Field Office
2465 S. Townsend Ave.
Montrose, CO 81401
(970) 240-5300
uformp@blm.gov

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Bureau of Land Management 2465 S. Townsend Ave. • Montrose, Colorado 81401
BLM UNCOMPAHGRE NEWS

January 5, 2010
Contact: Erin Curtis, Public Information Officer, (970) 244-3097

BLM Uncompahgre Launches Public Process to Revise Resource Management Plan

Montrose, CO -- The Bureau of Land Management Uncompahgre Field Office is seeking public input as it begins revising its Resource Management Plans (RMP).

The new RMP will provide overall management direction for the next two decades for the almost 700,000 surface acres of public lands and 2 million subsurface acres of federal mineral estate in Mesa, Montrose, Ouray, San Miguel, Gunnison and Delta counties managed by the BLM. The revisions are necessary because the demands on these public lands have increased and uses have become more varied since the original plans were completed in 1985 and 1989. An Environmental Impact Statement will be developed during the planning process.

In this first opportunity for public comment, called "scoping," the BLM is asking the public to help identify issues to be addressed in the plan revisions, as well as offer potential solutions. The BLM will use the information it receives during scoping as it prepares the Draft RMP revisions and associated Draft EIS.

"Public involvement is critical to crafting a land use plan that reflects local, regional and national values," said Uncompahgre Field Manager Barb Sharrow. "Scoping is only the first of many instances that we'll seek public input as part of this planning effort."

The scoping period runs through February 26, 2010. Six open house meetings will be held in local communities. The public is encouraged to visit, speak with BLM employees, learn more about the planning process and major issues, and share their comments and concerns. Open houses will be held:

January 12 in Hotchkiss
Memorial Hall, 175 1st St.
4:30 p.m. to 7:30 p.m.

January 13 in Delta
Bill Heddles Rec. Center, 530 Gunnison River Drive
4:30 p.m. to 8 p.m.

January 14 in Montrose
Montrose Pavilion, 1800 Pavilion Drive
4:30 p.m. to 8 p.m.

January 19 in Ridgway
Community Center at Town Hall, 201 N Railroad Street
4:30 p.m. to 7:30 p.m.

January 20 in Norwood
Community Meeting Rm, Norwood Town Hall, 1670 Naturita St.
4:30 p.m. to 7:30 p.m.

January 21 in Naturita
Naturita Community Center Library, 411 West 2nd Ave.
4:30 p.m. to 7:30 p.m.

During this initial scoping period, the BLM is seeking ideas about the uses of public lands managed by the UFO, possible protection measures, and recommendations on special designations such as potential special recreation management areas or areas of critical environmental concern. The public may also comment on the preliminary planning criteria, which help guide the planning process.

The Gunnison Gorge and Dominguez-Escalante National Conservation Areas are excluded from this planning effort. The management plan for the Gunnison Gorge NCA was completed in 2004. The newly designated Dominguez-Escalante NCA RMP process will begin early next year.

It is not necessary to attend an open house in order to submit scoping comments to the BLM. For further information about the planning process, visit our Land Use Planning webpage at www.blm.gov/co/st/en/fo/ufo/uncompahgre_rmp.html, or contact the project manager, Bruce Krickbaum, at (970) 240-5300.

Scoping comments provide the greatest benefit when they are specific, and received by the BLM prior to the close of public scoping on February 26, 2010. Comments may be:

- **Mailed to BLM Uncompahgre RMP, 2465 S Townsend Ave, Montrose, CO 81401**
- **Faxed to 1-970-240-5367**
- **Emailed to uformp@blm.gov**

BLM

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Erin Curtis
Public Affairs Specialist, Western Colorado
Bureau of Land Management
2815 H Rd, Grand Junction, CO 81506
Voice: (970) 244-3097
Cell: (970) 210-2126

U.S. DEPARTMENT OF THE INTERIOR **BUREAU OF LAND MANAGEMENT NEWS RELEASE**

Release Date: 02/26/10
Contacts: Erin Curtis, Public Information Officer, (970) 244-3097

BLM Uncompahgre Extends Public Scoping for Resource Management Plan Revision

Montrose, CO -- The Bureau of Land Management Uncompahgre Field Office has extended a public scoping period for the revision of its Resource Management Plans (RMP).

The new RMP will provide overall management direction for the next two decades for the almost 700,000 surface acres of public lands and 2 million subsurface acres of federal mineral estate in Mesa, Montrose, Ouray, San Miguel, Gunnison and Delta counties managed by the BLM.

A scoping period that began in January has now been extended through March 29, 2010.

During this first opportunity for public comment, the BLM is asking the public to help identify issues to be addressed in the plan revisions, as well as offer potential solutions. The BLM will use the information it receives during scoping as it prepares the Draft RMP revisions and associated Draft EIS.

“Public involvement is critical to crafting a land use plan that reflects local, regional and national values,” said Uncompahgre Field Manager Barb Sharrow. “Scoping is only the first of many instances that we’ll seek public input as part of this planning effort.”

BLM held six open house meetings in January in local communities to gather comments. The comments received at the open house meetings will also be incorporated into the RMP revision process.

For further information about the planning process, visit the Uncompahgre Field Office Land Use Planning webpage at www.blm.gov/co/st/en/fo/ufo/uncompahgre_rmp.html, or contact the project manager, Bruce Krickbaum, at (970) 240-5300.

Comments may be: Mailed to BLM Uncompahgre RMP, 2465 S Townsend Ave, Montrose, CO 81401
Faxed to 1-970-240-5367
Emailed to uformp@blm.gov

The BLM manages more land - 253 million acres - than any other Federal agency. This land, known as the National System of Public Lands, is primarily located in 12 Western states, including Alaska. The Bureau, with a budget of about $1 billion, also administers 700 million acres of sub-surface mineral estate throughout the nation. The BLM's multiple-use mission is to sustain the health and productivity of the public lands for the use and enjoyment of present and future generations. The Bureau accomplishes this by managing such activities as outdoor recreation, livestock grazing, mineral development, and energy production, and by conserving natural, historical, cultural, and other resources on public lands.

--BLM--

2465 South Townsend Avenue Montrose, CO 81401

Last updated: 02-26-2010

BLM UNCOMPAHGRE FIELD OFFICE

INVITES YOU TO VISIT AN OPEN HOUSE PUBLIC MEETING

The Bureau of Land Management Uncompahgre Field Office is revising its Resource Management Plan that will provide management direction for the public lands and minerals within the field office for the next two decades. We want to hear from you!

We are holding six open houses to get input from the public as we begin this process. Stop by at any time during the time shown, learn more about the planning process, and share your comments and concerns.

- **Tuesday, January 12**
  Hotchkiss, 4:30 – 7:30 p.m.
  Memorial Hall
  175 N 1st St
- **Wednesday, January 13**
  Delta, 4:30 – 8:00 p.m.
  Bill Heddles Recreation Center
  530 Gunnison River Dr
- **Thursday, January 14**
  Montrose, 4:30 – 8:00 p.m.
  Montrose Pavilion
  1800 Pavilion Dr
- **Tuesday, January 19**
  Ridgway, 4:30 p.m. – 7:30 p.m.
  Ridgway Community Center
  201 N Railroad St
- **Wednesday, January 20**
  Norwood, 4:30 – 7:30 p.m.
  Norwood Town Hall
  1670 Naturita St
- **Thursday, January 21**
  Naturita, 4:30 – 7:30 p.m.
  Naturita Library
  411 W 2nd Ave

For more information, or to comment online, please visit the project website www.blm.gov/co/st/en/fo/ufo/uncompahgre_rmp.html, or contact the project manager, Bruce Krickbaum, at (970) 240-5300. **Written comments should be received by February 26, 2010**: Mail to BLM Uncompahgre RMP, 2465 S. Townsend Ave., Montrose, CO 81401; Fax to 1-970-240-5368; or E-mail to uformp@blm.gov.

NATIONAL SYSTEM OF PUBLIC LANDS

Uncompahgre
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form by **February 26, 2010. To** submit your comments, print your completed form and fax it to 1-970-240-5367 or mail it to US Bureau of Land Management, Uncompahgre Field Office, Attn: Bruce Krickbaum, RMP Project Manager, 2465 S. Townsend Avenue, Montrose, CO 81401.

First Name _____ Last 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 (your name will not be shared)? Yes: ☐ e-mail materials only ☐ e-mail and hard-copy materials ☐ No

Please indicate your affiliation by checking the following boxes (check all that apply):

☐ 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) _____

Please answer the following four questions about your relationship to the Uncompahgre RMP Planning Area:

Do you live within the planning area? ☐ Unit 1 ☐ Unit 2 ☐ Unit 3 ☐ Unit 4 ☐ Unit 5 ☐ No
(Refer to map for unit numbers)

If you do not live in the planning area, do you live in: ☐ Colorado (west slope) ☐ Colorado (front range or plains)
☐ Another State (which): _____ ☐ Another Country (which): _____

If you do live in the planning area, how long have you lived here? Months: _____ Years: _____

Why do you live here? ☐ Occupation ☐ Family ☐ Proximity to public lands ☐ Recreational Opportunities
☐ Other _____

The BLM wants to hear from you! The Uncompahgre Field Office is committed to listening to and learning from our neighbors, friends, and stakeholders. Your answers to the following questions will be helpful at this point in the planning process, as are any other comments. When answering the following questions, where applicable please reference the planning units in the map available for download by clicking here. Please note that if your comments exceed 11 lines and begin scrolling, you will not be able to print all of your comments. Thank you for taking the time to provide your input.

What issues or concerns do you have regarding public land resources or uses within the Uncompahgre RMP planning area?

Respondents' comments, including their names and street addresses, will be available for public review at the Uncompahgre Field Office during regular business hours from 8:00am to 4:30pm, Monday through Friday, except holidays, and may be published as part of the environmental impact statement. 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.

Keeping in mind the issues above, what changes would you make physically to the landscape (such as what should it look like, modifications, etc.)?

Keeping in mind the issues above, what changes would you make to administration (such as management actions, rules, regulations, etc.)?

Keeping in mind the issues above, what changes would you make to social characteristics (such as number of users, size of groups, behavior of users, etc.)?

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

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Appendix B

List of Commenters

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APPENDIX B
LIST OF COMMENTERS

The scoping process informally began in December 2009, when the UFO published the first project newsletter. The formal public comment period as required by NEPA began on February 25, 2010, with the publication of a Notice of Intent in the *Federal Register*, and ended on March 29, 2010. **Table B-1**, Commenters, lists the commenters who submitted written submissions to the BLM for the Uncompahgre RMP/EIS as part of the public scoping process. All comments received on or before April 9, 2009, were included in this scoping report. The commenters are listed in chronological order of when their comments were received. Form letters submissions are not included in **Table B-1**, Commenters. **Table B-2**, Form Letter Submissions, includes a brief description of the form letters received, including number of letters received.

Table B-1
Commenters

	Commenter Name[1]	Affiliation	Date Received (Month/Day/Year)
		Federal Government Agency	
1.	Kathleen Ozga	Bureau of Reclamation, Upper Colorado Region	3/16/2010
2.	Kathleen Ozga	Bureau of Reclamation, Upper Colorado Region	3/29/2010
3.	Susan Starcevich	Department of Energy, Western Area Power Administration	3/29/2010
4.	Ken Stahlnecker	National Park Service	3/29/2010
5.	Larry Svoboda	US Environmental Protection Agency	4/5/2010
		State Government Agency	
1.	Dennis Kalvels	Colorado Info Tech Services	2/17/2010
2.	Jennifer Gimbel	Colorado Water Conservation Board	2/26/2010
3.	Robert P. Billerbeck	Colorado Natural Areas Program	3/26/2010
4.	R. Eric Kuhn	Colorado River District	3/29/2010
5.	Dave Roberts	West Elk Loop Scenic and Historic Byway Steering Committee	3/29/2010

Table B-1 *(continued)*
Commenters

	Commenter Name[1]	Affiliation	Date Submitted (Month/Day/Year)
		Local Government Agency	
1.	Doug Fritz	Hotchkiss Fire District	2/22/2010
2.		Town of Norwood	2/24/2010
3.	Linda Luther-Broderick and Peter Mueller	San Miguel County Open Space Commission	3/23/2010
4.	Lela J. McCracken	Delta County, Board of County Commissioners	3/26/2010
5.	Art Goodtimes	San Miguel County Commissioners	3/29/2010
6.	Greg Clifton	Town of Ridgway	3/30/2010
7.	Linda Luther-Broderick	San Miguel County Open Space Commission	4/6/2010
		Business/Commercial Sector (if applicable)	
1.	Jack Barnett	Colorado River Basin Salinity Control Forum	12/28/2009
2.	Scott Hill	Sleeping Indian Ranch	1/22/2010
3.	Robert Guinn	SG Interests, Ltd.	2/19/2010
4.		Oxbow Mining, LLC	2/22/2010
5.	Roy Kirkman	Exploration Research, Development and Analysis	2/23/2010
6.	Karla Tschoepe	Wildwood Ranch	2/24/2010
7.	Marc Stimpert	Brown, Schottelkotte, Stimpert & Vaughn, LLC	2/25/2010
8.	Lee Fyock	Gunnison Energy Corporation	2/25/2010
9.	Anne Sievers	Barney & Co., LLC	2/26/2010
10.	Hank and Edith Davis	Davis Ranch	3/1/2010
11.	Karen Budd-Falen	Budd-Falen Law Offices, LLC	3/2/2010 and 4/2/2010 (errata)
12.	R. Lance Wade	Western Fuels-Colorado, LLC	3/24/2010
13.	Dan McClendon	Delta-Montrose Electric Association	3/29/2010
14.	Richard White	Energy Resources Corporation	3/29/2010
15.	Philip (Wink) Davis	Mesa Winds Farm	3/29/2010
16.	Paul Szilagyi	Nuvemco LLC	3/29/2010
17.	Karl Myers	Tri-State Generation and Transmission Association	3/29/2010
18.	Mark LeValley	Black Canyon Ranch Property Lease, LeValley Ranch	4/5/2010
		Educational Institution	
1.	Kevin Bergstrom	National Outdoor Leadership School	1/11/2010
		Organization (non-profit, citizen's group)	
1.	Jack Barnett	Colorado River Basin Salinity Control Forum	12/28/2009
2.	Grady Harper	North Fork River Improvement Association	1/12/2010
3.	Walt Blackburn	Thunder Mountain Wheelers	2/5/2010
4.	Jonathan B Ratner	Western Watersheds Project	2/7/2010

Table B-1 *(continued)*
Commenters

	Commenter Name[1]	Affiliation	Date Submitted (Month/Day/Year)
5.	John Schnorr	Wisconsin Off-Highway Vehicle Association	2/9/2010
6.	Bill Day	Black Canyon Audubon	3/5/2010
7.		Citizens for a Health Community	3/12/2010
8.	Andrea Robinsong	Public Lands Committee of Western Colorado Congress	3/28/2010
9.	Rein van West	Ridgway-Ouray Community Council (ROCC), Air and Water Committee	3/28/2010
10.	Brian Hawthorne	BlueRibbon Coalition	3/29/2010
11.	Amber Kelley	Dolores River Coalition	3/29/2010
	Steve Smith	The Wilderness Society	
	Andrea Robinsong	Public Lands Committee of Western Colorado Congress	
	Bill Dvorak	Colorado River Outfitters Association	
	Hilary White	Sheep Mountain Alliance	
	John Weisheit	Colorado Riverkeeper	
	Kate Graham	Colorado Environmental Coalition	
	Veronica Egan	Great Old Broads for Wilderness	
12.	Stu Krebs	Uncompahgre Valley Association	3/29/2010
13.	Roz McClellan	Rocky Mountain Recreation Initiative	3/29/2010
14.	Nicholas Payne	Theodore Roosevelt Conservation Partnership	3/29/2010
15.	Matt Reed	High Country Citizens' Alliance	3/29/2010
16.	Elizabeth Roscoe	Friends of the River Uncompahgre	3/29/2010
17.	Steve Smith	The Wilderness Society	3/29/2010
	Kate Graham	Colorado Environmental Coalition	
	John Weisheit	Colorado Riverkeepers	
	The Sheep Mountain Alliance	Sheep Mountain Alliance	
	Bill Dvorak	Colorado River Outfitters Association	
	Andrea Robinsong	Public Lands Committee of Western Colorado Congress	
	Amber Kelley	Dolores River Coalition	
18.	Jim Stephenson	Ridgway Ouray Community Council (ROCC)	3/29/2010
19.	Heather Tischbein	Western Colorado Congress	3/29/2010
	Robert Peters	Western Slope Environmental Resource Council	
20.	Corey Fisher	Trout Unlimited	3/30/2010
21.	Roz McClellan	Rocky Mountain Recreation Initiative	3/30/2010
22.	Claire M. Moseley	Public Lands Advocacy	3/30/2010
23.	Steve Smith	The Wilderness Society	3/30/2010
	Bethany Gravell	Center for Native Ecosystems	
	Amber Kelley	Dolores River Coalition	
	Bryan Martin	Conservation Colorado Mountain Club	

Table B-1 *(continued)*
Commenters

	Commenter Name[1]	Affiliation	Date Submitted (Month/Day/Year)
	Christine Canaly	San Luis Valley Ecosystem Council	
	Robert Peters	Western Slope Environmental Resource Council	
	Hilary White	Sheep Mountain Alliance	
	Kate Graham	Colorado Environmental Coalition	
	Mike Chiropolos	Western Resource Advocates	
	Peter Hart	Wilderness Workshop	
	Roz McClellan	Rocky Mountain Recreation Initiative	
	Tom Sobal	Quiet Use Coalition	
	Rocky Smith	Colorado Wild	
		Individual	
1.	David Kuntz		12/27/2009
2.	Adam Mehlberg		1/7/2010
3.	s Robert Haynes		1/11/2010
4.	William Bear		1/12/2010
5.	Andrew Coonan		1/12/2010
6.	Bill Ela		1/12/2010
7.	Gene Goffin		1/12/2010
8.	Ashley Krest		1/12/2010
9.	Indra Leu		1/12/2010
10.	Bill McKernan		1/12/2010
11.	Cynthia Wutchiett		1/12/2010
12.	Millicent Young		1/12/2010
13.	William Jardon		1/13/2010
14.	Ket Redding		1/13/2010
15.	Rick Weaver		1/14/2010
16.	Hank Masterson		1/15/2010
17.	Barry Schreckengast		1/16/2010
18.	Martin Luitefield		1/18/2010
19.	George Greenbank		1/19/2010
20.	Tim Patterson		1/19/2010
21.	Gordon Reichard		1/19/2010
22.	Wendell Koontz		1/20/2010
23.	Greg Lehr		1/20/2010
24.	Laurie Brandt		1/21/2010
25.	William Lobato		1/21/2010
26.	Laurie Smith		1/21/2010
27.	Spencer Rylaude		1/22/2010

Table B-1 *(continued)*
Commenters

Commenter Name[1]	Affiliation	Date Submitted (Month/Day/Year)
28. Paul Koski		1/27/2010
29. David Hurr		1/29/2010
30. Ralph D'Alessandro		1/31/2010
31. Lloyd Stahl		2/3/2010
32. Judy Nobles		2/5/2010
33. Harold Hillis		2/6/2010
34. Garry Baker		2/8/2010
35. Barney and Shawn Mock		2/9/2010
36. Nobles		2/9/2010
37. Kevin Clark		2/10/2010
38. Joe Garvey		2/11/2010
39. Peter Winn		2/14/2010
40. Anonymous		2/17/2010
41. Laurie Taylor		2/17/2010
42. Ilene Lewis		2/18/2010
43. Duane Renfrow		2/18/2010
44. Alan Malcolm		2/19/2010
45. Judy Nobles		2/19/2010
46. Jerry Ahrens		2/22/2010
47. James Dowell		2/22/2010
48. Keith Fellin		2/22/2010
49. Debra Littlefield		2/22/2010
50. Willis Olson		2/22/2010
51. Roman Rourd		2/22/2010
52. Mike Shults		2/22/2010
53. Guy Wright		2/22/2010
54. Ron Applebach		2/24/2010
55. David Congour		2/24/2010
56. SamanthaLyn Samuelson		2/24/2010
57. Valerie Crespin		2/25/2010
58. Art Etter		2/25/2010
59. Calvin Nobles		2/25/2010
60. Tawnia Welch		2/25/2010
61. Kevin Anderson		2/26/2010
62. Jeff Campbell		2/26/2010
63. Danell Carter		2/26/2010
64. Mike Clarke		2/26/2010

Table B-1 *(continued)*
Commenters

Commenter Name[1]	Affiliation	Date Submitted (Month/Day/Year)
65. Sherry Craig		2/26/2010
66. Pat Enstrom		2/26/2010
67. Daniel Hunt		2/26/2010
68. Michael and JoEllen Morgan		2/26/2010
69. Lowell Watson		2/26/2010
70. Jody Weimer		2/26/2010
71. Zene Weimer		2/26/2010
72. Ernie Etchart		2/27/2010
73. Dave Abbott		3/1/2010
74. Harold Cressler		3/1/2010
75. Winona Cressler		3/1/2010
76. Holly Davis		3/1/2010
77. Kent Davis		3/1/2010
78. Nicholas McCracken		3/1/2010
79. Thomas Torres		3/1/2010
80. John Wool		3/1/2010
81. Millicent Young		3/1/2010
82. Sally Kichelmann		3/2/2010
83. Brian Hoefling		3/3/2010
84. Sharon Beard		3/4/2010
85. Constantine Hirschfeld		3/4/2010
86. Nancy Franklin		3/5/2010
87. Brandon Siegfried		3/5/2010
88. Craig Grother		3/7/2010
89. Kent Sundgren		3/8/2010
90. Rosemary Bilchak		3/9/2010
91. Bob and Donna Green		3/9/2010
92. Josh Roberts		3/9/2010
93. Donald Hart		3/10/2010
94. Neil Michael Wilson		3/10/2010
95. Constantine Hirschfeld		3/11/2010
96. Susan and Gordon Hickle		3/15/2010
97. Allison Elliot		3/17/2010
98. Ronald Henderson		3/17/2010
99. Peggy Lyon		3/17/2010
100. Karl Hanzel		3/18/2010
101. Kent Brakken		3/19/2010

Table B-1 *(continued)*
Commenters

Commenter Name[1]	Affiliation	Date Submitted (Month/Day/Year)
102. Dan Auerbach		3/22/2010
103. Linda Van der Veer		3/22/2010
104. Phyllis Swackhamer		3/23/2010
105. Coen Dexter		3/24/2010
106. James Harden		3/24/2010
107. Barbara Hill		3/24/2010
108. Roy Johnson		3/24/2010
109. Marty Warner		3/24/2010
110. Ed Neil		3/24/2010
111. William Berry		3/25/2010
112. Gregory Craig		3/25/2010
113. Ali Lightfoot		3/25/2010
114. Mary Pfalzgraff		3/25/2010
115. Andy Goldman		3/26/2010
116. Robert Haynes		3/26/2010
117. Mike Jackson		3/26/2010
118. Tim Johnson		3/26/2010
119. Indra Leu		3/26/2010
120. Brenda Miller		3/26/2010
121. Kirk Morgan		3/26/2010
122. Dale Reed		3/26/2010
123. Amber Kleinman		3/27/2010
124. Joe Brinton		3/28/2010
125. Rosemary Esty		3/28/2010
126. James Graziano		3/28/2010
127. Paul Herbert		3/28/2010
128. John Hollrah		3/28/2010
129. Julia Johnson		3/28/2010
130. Robin Nicholoff		3/28/2010
131. Maxwell Aley		3/29/2010
132. Smythe Boone		3/29/2010
133. Chris Carrier		3/29/2010
134. Michael Cassidy		3/29/2010
135. Bart Eller		3/29/2010
136. Galley Stan		3/29/2010
137. La Vonne Glanville		3/29/2010
138. William Hamann		3/29/2010

Table B-1 *(continued)*
Commenters

Commenter Name[1]	Affiliation	Date Submitted (Month/Day/Year)
139. Bill Hamman		3/29/2010
140. Tom Hanel		3/29/2010
141. Roy High		3/29/2010
142. Carl Johnson		3/29/2010
143. Pete Kolbenschlag		3/29/2010
144. Steve and Leah Morris		3/29/2010
145. Barb Poole		3/29/2010
146. Earl Reams		3/29/2010
147. Jim Riddell		3/29/2010
148. David Schneck		3/29/2010
149. Joel Sorenson		3/29/2010
150. Michael Tarbell		3/29/2010
151. Marv Ballantyne		3/30/2010
152. Randolph and Jennifer Parker		3/30/2010
153. Nancy Winkler		3/30/2010
154. Bonnie Beach		3/31/2010
155. Dan Auerbach		4/5/2010

[1]Table does not include form letters submissions; refer to Table B-2, Form Letter Submissions.

Table B-2
Form Letter Submissions

Date First Letter Received (Month/ Day/Year)	Organization Identified (if any)	Number of Form Letters Received	Number of Form Letters with at Least One Unique Comment	Description of Form Letter Contents
2/2/2010	Western Colorado Chapter of the Gold Prospectors Association of America	17	0	Comments in favor of placer mining on the San Miguel River
2/4/2010	Western Colorado Chapter of the Gold Prospectors Association of America	18	0	Comments in support of maintaining accessibility on public lands
2/12/2010	Western Colorado Chapter of the Gold Prospectors Association of America	6	3	Comments opposed to designation of the San Miguel River in the National Wild and Scenic Rivers System
2/22/2010	(none identified)	6	0	Comments opposed to Wild and Scenic River designation in the project planning area
2/23/2010	Citizens for a Healthy Community	117	12	General conservation-oriented comments
2/24/2010	(none identified)	13	1	Wild and scenic river comments
2/24/2010	(none identified)	4	0	Comments opposed to wild and scenic river designation in planning area
2/25/2010	Motorcycle Trail Riding Association and Trails Preservation Alliance	2	0	Recreation-orientated comments
3/16/2010	(none identified)	10	0	Comment stating opposition to revision of the RMP
3/18/2010	(none identified)	28	18	Comments in favor of protections for Dolores River Basin
3/25/2010	(none identified)	12	9	General conservation-oriented comments
3/29/2010	(none identified)	2	0	Comments in support of maintaining accessibility on public lands
3/30/2010	The Wilderness Society	20,831	37	General conservation -oriented comments

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Appendix C

Comments by Resource Panning Issue

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APPENDIX C
COMMENTS BY RESOURCE PLANNING ISSUE

The BLM received 2,496 discrete comments during the Uncompahgre RMP scoping period. These comments were classified by RMP process category and by planning issue. Comments for each the RMP process categories and for planning issue categories are included in this appendix. Comments are included verbatim from the comment letters; however, information in letters that was not considered a comment is not included here. Comment letters can be viewed in their entirety at the UFO in Montrose, Colorado. Comments are included for the following groups:

Comments by Process Category:

Table C-1 General Comments Outside the Scope of the RMP

Table C-2 Comments Related to Issues to Be Solved by National Policy

Table C-3 Comments Related to Implementation Actions

Comments by Planning Issue:

Table C-4 General Comments Related to the RMP

Issue 1:

Table C-5 Air Quality, Water, and Soil

Table C-6 Drought Management/Climate Change

Table C-7 Fish and Wildlife

Table C-8 Vegetation

Table C-9 Special Status Species

Table C-10 Special Designation Areas – General

Table C-11 Special Designation Areas – Areas of Critical Environmental Concern

Table C-12 Special Designation Areas – Wild and Scenic Rivers

Table C-13 Special Designation Areas – Wilderness, Wilderness Study Areas, Lands with Wilderness Characteristics

Table C-14 Special Designation Areas – National Scenic Byways

Issue 2:
Table C-15 Energy Development – General

Table C-16 Non-renewable Energy Development

Table C-17 Minerals and Mining

Table C-18 Renewable Energy Development

Issue 3:
Table C-19 Recreation Management

Table C-20 Travel Management

Table C-21 Noise

Table C-22 Visual Resources

Table C-23 Livestock Grazing

Table C-24 Forestry

Table C-25 Wildland Fire Management

Issue 4:
Table C-26 Lands and Realty

Issue 5:
Table C-27 Cultural and Heritage Resources

Table C-28 Paleontological Resources

Issue 6:
Table C-29 Social and Economic Considerations

Table C-30 Public Health and Safety

Table C-1
Comments Beyond the Scope of the RMP

Comment ID	Comment
1619	Put $ into carbon capture technologies.
1009	I am concerned that the supreme court's ruling declaring corporations as people with the same rights to contribute to certain public officials and campaigns as they choose seriously endangers our health, through the self interests of high rollers such as Exxon. Do unto other generations as you would have them do unto you (ours)."
809	Reduce red tape and cost for drilling and mining
401	The trail from the Cashin Mine to the Bedrock Store via La Sal Creek and the Dolores River is the old road from Colorado to Utah. Both ends of the closed road have had motorized travelers lately. They have not been able to get all the way through because of their inability to cross La Sal Creek. Signs need to be posted on the trail heads, one at Cashin Mine and one south of the Bedrock boat ramp. It may take physical barriers to prevent motorized travel.
2376	There is a problem here--it is postmodernists: those who refuse, for whatever reason, to accept the reality of space-time. The subportion of space here is that of a wilderness ecozone. This is a habitat for wildlife, not for offroading thrillseekers, noisemakers and scofflaws.
803	We spend time out there every week of the year. We would like to organize a clean up day and have a big party at our house at the end.
1324	As mentioned, we are a uranium company. Part of our decision to conduct a business central to the ubiquitous natural element is its use as fuel for clean, cost efficient nuclear power. Another part is the reality the U.S. currently generates over 20% of its electrical power via nuclear power plants, yet imports over 90% of the uranium fuel such power plants use. This obviously cannot continue without undue and unnecessary reliance on foreign sources. Similarly, the current rate of production worldwide is roughly 60% of what is consumed, pointing out the need for increased mining.
510	Signage and enforcement should be priorities for any budget requests. Regarding dispersed camping, off road game and shed antler retrieval
175	I truthfully believe that the BLM and National Forest bureaucracies have morphed into organized policies of terror against the citizens of this country. This first came to my attention when the BLM started intimidating senior citizens for picking up arrowheads (even though it is their right to do so according to the Congressional Record). Most recently this was further confirmed by the debacle in Blanding Utah among others that I know of. How can the federal government implant a felon to entrap citizens using government money and bribes with any degree of integrity! Then, go beyond that and "attack" in assault gear en masse on these people and their families, both physically and verbally. I thought an American citizen was innocent until charged and then proven guilty. The compounding arrogance was visited upon us by Ken Salazar who with glee on television denounced these citizens as scum. As government bureaucrats BLM employees were hired to manage the citizens property. Now they have co-opted to insert themselves as police against the citizens.
176	Stop this insult and deception that your new policies are good for the people and the environment. You have more than enough legal authority by which to manage the land. You don't need more corrosive laws that take away constitutional and inalienable rights.
747	Today with the speed the world is changing global warming, earth changes, contaminations of our water sources, overpopulation etc. values have to change!
515	My wife and I own Monitor Mesa Ranch, which is located on Monitor Mesa in the Dominguez-Escalante National Conservation Area on the Uncompahgre Plateau. We are concerned about the use of the public lands which surround our ranch and, in particular, the proposed construction of additional roads into this area.
504	Regarding the already existing Dry Creek Travel Management Plan (TMP): The BLM is to be commended on its adoption of the Dry Creek TMP. It should not reconsider its decision to close Monitor Creek Canyon to motorized use by creating a connector for motorized travel from 25 Mesa Road going into the canyon system. Its proximity to the Camel Back WSA and the Forest Service Roubideau WSA demands its management as a primitive backcountry area for wildlife and quiet use.
281	The area included in the RMP boundaries contains some fantastic “wild places”. In a West that continues to urbanize and develop rapidly, these places (especially those outside of the rocky mountain ridges that often fall under USFS jurisdiction) are increasingly valuable. I would like to see an end to further road construction; better designation of OHV use and non-use areas; the elimination of non-renewable energy development and

Table C-1
Comments Beyond the Scope of the RMP

Comment ID	Comment
	careful consideration of the footprint associated with any renewable energy projects such as solar or wind installations; and continued maintenance of facilities such as the (very much appreciated) picnic/camp areas on the San Miguel.
2441	The program doesn't work. New administration promised to rid programs that do not work. Oil and gas profit at the expense of our lands, our wildlife, our waterways.
2650	Please note, refusal to respond sincerely, effectively, and totally to my letter, which constitutes an act of participatory democracy, is considered by me a termination of the social contract between myself and the United States Government.
428	Keep the RAC activities to promote public - private collaboration and education.
2447	The Bushian Nightmare is over! Let the policies based on real science, solid logic, good reasoning, and common sense begin!
2449	After 8 years of the Bush administration's assault on America's natural lands, we have much repair work to do.
449	We need signage, parking and staging areas as appropriate for each entrance.
1094	Environmental Assessment conducted at Windy Point (confluence overlook) for a trail to the upper and lower overlook, with interpretive signage, parking, turnaround, safety railing, etc.
1096	Trail Feasibility Assessment along Unaweep-Tabeguache Scenic and Historic Byway
2348	Thank you for helping to save these executives why saving the Western Gray Whale important. Thank you for considering my comments. I look forward to your swift action to ensure a complete ban on whaling in Iceland. Thank you for your consideration of this issue. Thank you for considering my views on this issue. I look forward to your reply. Sincerely, thank you for considering my views on this issue. I look forward to your reply. Yours truly, Thank you for considering my comments. Thank you for taking my concerns into consideration. Sincerely, thank you for considering my comments. P.S. I Love Wildlife
223	More effort should be expended to protect the Gunnison sage grouse north of Black Canyon of the Gunnison National Park (we realize that this area is outside of the area currently being considered for revision).
473	Access and use of public lands should remain free. Fees for use and access to public lands should not be increased without public input. Enjoyment of our local public lands should remain available to people with the most limited of financial means, especially during our current tough economic times.
230	No specific recommendation at this time; however, should Curecanti NRA be legislatively established, at that time work with NPS to develop/amend agreements.
793	Somehow stopping the lawsuits when a government decision does not give you 100% of what you want. These are (illegible text)
2701	What we as a nation do from today forward, creates the legacy we leave our children and the future of the Earth. Anyone 60 years or older sees, feels and lives on an Earth facing problems you and I have caused by taking the short term, easiest, most lucrative way. We're told, by those with greed to gain, there's no price to pay for our disregard for the future... but you and I and any thinking person knows differently. You and I, our families, and their families of the future are going to pay the price for our choice to look the other way... Please, let's start today to choose the path that will bring goodness to us all, rather than ruin to the planet upon which we're all blessed to live. I trust you will choose what is right for us all…
795	Stop letting the EPA and "environmental protectionist" groups control what happens.
766	Maintain and continue to support BLM minerals staff. Don't become a "recreation" agency at expense of other functions.
765	Vigorously support Colorado Roadless Initiative
2675	Just wondering how much lobby money John Salazar is reaping from all this.....better be NONE!!!!!!!!
228	Nominate the C-77 Road Gunnison sage grouse habitat as an ACEC to increase protection for this species (we realize that this area is outside of the area currently being considered for revision). This could involve restricting some types of use during critical seasons (such as OHV use).
2376	Do we not hear of extreme weather conditions constantly? Newly forming deserts? Floods? And yet humans have known for generations. Cut down trees, cover the land with asphalt and sprawl development, fossil fuels -

Table C-1
Comments Beyond the Scope of the RMP

Comment ID	Comment
	the list goes on. What do we get? mudslides, floods, deserts . When will we learn that we MUST protect what wild, natural and nurturing areas that we have left.
1694	No roads should be constructed in Forest Service Inventoried Roadless Areas for energy extraction.
862	The BLM wants to make more rules for the public, but rarely do I see them being able to enforce them on the ground. Staff are bogged down in paperwork in offices, and there is no funding to staff appropriately for law enforcement. These are the two main comments I get when I ask personnel why something hasn't been taken care of, or why something is moving slowly.
861	Management actions should always be neighborly towards private property owners adjacent to BLM lands. Being neighborly also includes attitudes towards ranchers with BLM grazing allotments, and any other party who may have a permit to use BLM lands. Meeting with people on the land instead of in offices.
2471	This has got to stop we need to keep our lands the way the Lord created them. Please save them We are hurting everything else the people getting turned down for help for food and people in the United States suffering because no one will help them so please let the starving people and homeless people know are lands are safe.
927	The BLM administration should by all accounts should communicate in the field and attend our meetings.
926	How about the BLM office police the area until we arrive.
2549	What shall we drink when the water is polluted with heavy metals and other toxic substances? What shall we breathe when the air is choked with pollution and particulates? Where will we go to escape the stress and darkness of our urban areas if no wild places remain? God guide your decision as a steward of this Earth and its inhabitants
889	Six miles below my ranch is a subdivision that has very easy access to public lands. Residents drive, ATV and motorcycle at all hours up the numerous roads. They dump their trash, litter out their vehicle windows, dump fireplace ashes, target practice and poach. All because they abut public lands, and access is so easy. They have never been taught what goes on in the environment while they're not present. They are not thinking about what the consequences are of their ATV's traveling off road=spreading weeds, others follow their tracks, air and noise pollution, erosion. These people encourage wildlife to come into the subdivision by placing all kinds of food out for creatures.
2513	Thank you for the opportunity to comment on the Uncompahgre RMP revision. Although I only agree with rather than actually prepared these comments, let me add personally how deeply I sense the interconnections between nature as God originally granted us and the incredibly harsh impact on health, morality, and spiritual evolution that our know-it-all approach to revising nature in our industrial image has caused. The economic issues attached to our past, present and future must be thought of accordingly. The economy is (in reality) more abstract than the conflicts within humanity.
2433	I can hope Tennessee and other areas in the south does these things also to preserve our natural heritage and possibly learn from your great example.
820	Off-road vehicle use: Require all vehicles to stay on designated roads and trails, and close excess roads and trails in the Escalante-Dominguez NCA.
2413	We are losing our wild lands and national parks in alarming numbers to gas, oil and mining interest who destroy the lands for future generations. Shell Oil is already plowing through the Alaskan seas, once a protected area. Tongass rain forest is being open to clear cutting old timber which is why when I go to the lumber yard all that is to be bought qualifies as a poor grade of lumber due to the lack of proper growth. You can not quick fix nature, That Is A fact. ONCE IT IS GONE WE CAN NOT THERE IS NO MORE. We need these wild areas to fight Global Warming, preserve wildlife and to leave something besides rust and pollution for the next generation.
1616	Create jobs that clean and strengthen our environment, Not trash us.
1719	An over-arching concern of mine is that Americans--and the gov't agencies we fund--can't keep allowing the "privatization" if not "corporatization" of the oversight/management of the commons and other public interests. People/entities focusing on short-term privatized financial gain, who don't believe in government and the purpose of government, including the long-term management of the commons.

Table C-1
Comments Beyond the Scope of the RMP

Comment ID	Comment
354	If the following withdrawals have not been examined and eliminated they should be (this is from ACEC Record of Decision): Most of the lands in the canyon bottom, between Placerville and the town of Pinon were withdrawn under Powersite Classification in 1925. An estimated 12,040 acres remain withdrawn. Withdrawals within the proposed ACEC total 8,600 acres, and an additional 3,440 acres in the remainder of the propsed SRMA. These withdrawals have not yet been reviewed or modified.
1553	This whole process seems to be a politically correct land and water rights grab by the BLM using the department of Ecology and the United States Congress as the sledge hammers to push us "little people" off of our claims.
867	3.1 BLM Recreation &Visitor Services: I think it is necessary to charge fees in some areas because of heavy use, and repetitive use by the same people. Since the BLM cannot keep up with maintenance of what it already has in place, fees are necessary. Pay to Play.
715	Enact regulations that would make it impossible for anti-human organizations like Western Slope environmental or Green Peace to economically attack the good people of western Colorado. Using the rise or fall of ATV sales as an excuse.
1338	We would like to point out that if not mining here, then where? If not under the stringent BLM regulations and worker protections, then in what country where neither is provided to the level of provided in the U.S.?
289	would also like to see more law enforcement funds allocated, or a plan that allows for more law enforcement out and about. The people that abuse the dispersed use areas should be confronted.
1382	we are all entitled to the royalties that come from their sale.
347	Eliminate the following, as found in San Miguel ACEC Record of Decision: Trails in Saltado and Beaver Creek Canyons may be constructed as well as a boat ramp on the San Miguel at Beaver Creek. If feasible, a bicycle and foot trail.
2478	So good old Big Oil and Gas is at it again. We all know that all energy products like uranium is also owned by this same group.
929	Again attend our meetings and also communicate in the field.
2746	Pres. obama is supposed to upend all the damage done by Bush . Include this in that restoration . thank u .
374	A program of trimming out every old, diseased or too thick vegetation, and the Gov. guy the lumber and ship it to Haiti for foreign Aid.
887	8.2 Wildland-Urban Interface: To manage recreation in these areas, we must begin by educating our children in the classroom. They take info home to their parents furthering the education process. We must teach an entire generation to care for public lands. Communities that abut public lands need to take responsibility for the lands. Getting school children out of the classroom and onto the land to carry out projects is necessary for them to care about their surrounding environment, and feeling ownership. Civic groups also need to take on projects, even if its as simple as maintaining one sign or a kiosk, a trail, picking up trash, etc. If people will begin to care for the land, and understand what is going on everyday, they will feel possession of it, and will take action to protect it. Examples: an eye out for poachers, trash dumping, dogs chasing wildlife, weed invasion.
844	Rules and regulations are set back in Washington and influenced by the interest groups. What I would like to see doesn't matter unless it falls in line with those top down rules.
2417	While I would like to see all our wilderness lands completely protected from ALL forms of commerce, economics is going to win, as always.

Table C-2
Comments Related to Issues Solved by National Policy

Comment ID	Comment
966	Education within the local school systems. Teach the kids the science and management of our public lands. Give them the opportunity to have some inherent ownership.
1005	Let me stress: Informing and educating users and the public should be very high BLM priorities.
2345	This is my second letter to the BLM this morning. And both letters are telling you to manage the land for the sake of the land and its wildlife. I do not pay taxes for my lands to be farmed out to ranchers or devastated by energy companies. Neither ranchers nor energy companies are going to give me price breaks. And both are going to totally ruin the public lands and not restore them after doing so. Steward the land rather than constantly renting it to special interests.
642	In the interest of safety, as well as in protection of a fantastic community asset, signs should be installed to clearly identify on which trails motorized vehicles are not permitted
1175	EPA supports efforts to address motorized-use resource damage, user conflicts, and enforcement issues. To meet the goals of wildlife protection, vegetation management, erosion and sedimentation minimization, and user satisfaction with the recreational experience, education and enforcement of travel requirements should be a priority. Maps and signage to promote public understanding of travel restrictions can improve compliance.
187	Again, I am against more Wilderness or Wilderness Study Areas, we have enough. For example, take the dominguez/escalante area that was recently turned into a NCA and includes 66,000 more acres of Wilderness. Many people will never be able to enjoy the scenic beauty of this area due to it now being inaccessible unless you are the hardiest of hiker or horseback rider. I feel land can be protected without locking everyone out. This area was not being damaged by over use or rampant ATV or motorcycle use. Many canyons and special places I enjoy are now totally off limits unless I can hike for several days to access them. I feel this is wrong and unnecessary and caters to that vocal minority of ultra-conservative, well funded, environmentalist who probably never visited this area in the first place.
1828	Management should enforce rules and laws already in place instead of trying to implement new ones that prohibit public use and access.
1549	Apparently there are no actual written guidelines about what happens to an active but unpatented placer claim. This appears to be done with the intent to deny access to the claims utilizing any flimsy excuse that can be dreamed up by the BLM personnel. There seems to be a national trend in the BLM management to exclude local water rights and local water users in favor of tourists, fishermen, rafters and other so-called ECO friendly groupies.
1101	We would also like BLM to consider preservation of the old highways and make bike and hiking trails from them. This would allow for industrial trucking to occur, and keep the biking/hiking people out of danger, as well as preserve "what used to be" for generations to come.
847	Educate the users. Constantly work to keep in the users face about the right way to recreate on public land
1336	But we would ask the BLM to add this to its education agenda to blunt the fear mongering and get back to adult discussions framed in reality. We could go as far as saying BLM is asking for input on how things used to be, not on the current remediation requirements; BLM may well be asking for a problem when the solution already is in place.
630	Being a member of the subdivision I hear and see many off-road motorcycles and ATVs driving on our streets to access the BLM through an unbuilt lot in our subdivision. While I don't like the noise and speed at which they travel our streets I am also dismayed by the damage that they incur on the trails, especially when the trails are muddy and they ride anyway. The access that they use (mostly) is through a cul-de-sac at the top of the subdivision and I don't believe this is a legal access. The trail there keeps getting wider and more eroded by this steep entry. From time to time I see their tracks on the single track walking trails which is dangerous to the non motorized traffic that mostly uses those trails. There are some roads that are established that they could use that already have a double track, but the entry off our subdivision should be cut off. The off-road vehicles are illegal to be using public streets anyway and my neighbors complain about the noise of them screaming up the big hill that leads to the unfortunate access through the unbuilt lot. I would ask you to consider having an access for motorized travel off the Minnesota Creek Road. Maybe a staging area could be built so they could legally trailer the off-road vehicles to a parking lot and start from there.
1333	Lastly, we question why there are not fees charged to those who appeal mining permits consistent with the costs of annual assessments and permit applications, or at a minimum of a waiver of such costs when the

Table C-2
Comments Related to Issues Solved by National Policy

Comment ID	Comment
	holders of such claims are prevented from the benefits of their mineral rights.
1323	We further hope that more time is spent educating the public of the legal rights of mineral rights owners; we suspect an improved understanding will make everyone's life easier and consensus easier to reach when everyone's wishes and unconstrained desires are tempered with reality.
2460	They should also make sure that American citizens receive royalties for any resources taken from our public lands.
2428	Tax dollars should support wildlife and tranquility, not RV's and land-tearing machines.
1332	We would also encourage the BLM and the Colorado Department of Reclamation, Mining and Safety to return to coordinated efforts on permitting. It makes no sense to us to have two sets of standards, two sets of regulations, two sets of approvals, etc. that seems to add little to the process except duplication of everything, costs more than double and the time frame to get anything done more than four - fold.
843	Solve resource issues instead of closing system routes that are not up to standard with the hope of replacing them
653	We need more education about trail maintenance and teach people to stay on the trails and not tear up the land by irresponsible use. I believe most people that do ride off trail or enter sensitive wetlands do so not out of disrespect for the land but out of ignorance, not even realizing the consequences of their actions, to curb this we need better education regarding responsible land use.

Table C-3
Comments Related to Implementation Actions

Comment ID	Comment
1100	Widen Y-11 to make the road safer, pullouts, room for interpretation. Best up close views of Hanging Flume are from Y-11.
587	Signage to designate what activities are suitable in specific areas would be desirable, including where target shooting can occur. A safe environment for all users is desirable.
1641	If possible, enhance the experience for boaters by creating accessible put ins and take outs along with clear signs as to how to get there. We ended up winching our boat with several cables under a train bridge which I doubt many have done before or since.
808	Do more maintenance on existing access.
905	Enforce rules you already have
1098	Boat put in/take out in Naturita
1106	Carry trash in - carry trash out!
220	Single track trails would need to be signed to educate the public about how to keep them narrow and sustainable. If the trails are non-motorized, they need to be signed clearly and occasionally "policed" by BLM rangers to educate the motorized public and enforce the designation. Maps would also need to clearly indicate the status of trails for appropriate users. There would probably need to be fines for violators.
1103	Do not fence the river. It is not wide enough and any time there is disturbance - weeds will come in.
646	I feel some areas need better signage as to what is an open trail and what mode of transportation is allowed on that trail.
1072	River trip boat ramps
763	Road maintenance schedule and performed regularly.
1097	Camping facility around Naturita/Nucla similar to between Placerville and Norwood
916	Part of my land and that of neighbors adjoins BLM land. The 1979 RMP referred to the need for BLM to fence the southern border between BLM and private land to prevent livestock trespass, which is a perennial problem. When queried about this, then Range Con officer Jim Sasma said there were no funds available to accomplish this goal. I would like to propose a joint project, perhaps using solar-powered electric fence along this boundary, with cost and maintenance shared by private landowners, the permitee (Jim Patterson), and BLM.
79	Hire more field personnel to monitor the activities including ongoing reclamation of oil and gas development on BLM lease land.
563	There is a group of 100+ people in the Paonia area who want to put signage up and preserve the non - motorized single track experience and we urge the BLM to work with them. This would get it all out in the open to the public and allow for good communication to address trail ethics, trail maintenance, caution signs etc, as well as stop any new unauthorized trails. This group has purchased signs to mark some of the trails "Open to hikers, bikers, horses" but "Closed to ATV's & motorcycles."
863	Although no one likes to see a sign in the middle of no where, sometimes its necessary, as sometimes a sign might change the behavior of a few people. It provides a visible regulation, so action can be taken against someone who violates the rule posted by the sign.
201	A system of wayfinding signage should be implemented to assist recreational use of BLM lands near the city.
764	Additional signage for BLM access/trails.
600	Provide information via signage and brochures as to who has the right of way on trails when there are multiple uses (i.e., hikers, bikers, equestrians, OHV riders). Most people are very courteous, but some people create hazardous conditions for other users.
778	Trailhead development for the WSA and SMA areas in Unit 5 so visitors have better access into those places and have more information about those unique areas.
837	Keep trails in better condition to limit off trail use.
603	Users need to respect other users and other uses. Public education such as signage at trailheads can help.
1099	River clean up to make rafting possible and safer from Uravan to Confluence of San Miguel and Dolores Rivers.

Table C-3
Comments Related to Implementation Actions

Comment ID	Comment
183	I would like to see more areas developed for recreation such as what the BLM has done at Peach Valley. This is a model of controlled recreation, proper signage is in place and this is a great resource to many families in our area. On any sunny weekend you'll find hikers, bicyclist, horseback riders, ATV riders and motorcycles all enjoying our public land in harmony. There are trails for all groups, great job BLM! I feel the Delta adobes could be developed in a similar way, people come from all over the state to enjoy these types of areas, it brings money to our area and promotes outdoor recreation.
199	Trailheads should be built on large BLM tracts near the Montrose city limits (Unit 3) to allow recreational access without requiring driving to the trailheads. Some of these trailheads will require access across private lands.
841	Properly marking routes and maintaining maintenance levels, or challenge levels on those routes.
851	Any time there is private property bordering BLM, and BLM is doing something to the land near this private property, the BLM should notify property owners in advance of any weed spraying, chaining, seeding, mineral extraction, studies of wildlife, plants, erosion, water etc. Everyone needs to practice neighborly manners.
776	Create permanent camp facilites similar to those along the San Miguel River corridor at Tabeguache Creek/Z-26 Rd. N. Fork Mesa Creek/P-12 Rd and "Biscuit Rock" are along Hwy 141 north of the Hanging Flue. All three areas see heavy seasonal usage and high impacts and should be considered for resource protection.
777	Post a local BLM representative in the West End for resource information, development and enforcement.
857	And, assemble volunteers. Amazing how many people will show up to do work outdoors if they're provided a free lunch. How about reinstating the Civilian Conservation Corps?
1090	A restroom and trash can on Y-11 at the confluence of the Little Dolores and San Miguel Rivers, This is frequently used by many people to fish and camp, and increases annually. As I personally pick up a lot of trash from this area, it would be nice to encourage people to use a container. A toilet facility would probably be a good idea as well.
1091	Trash cans at East Creek day use area.
1092	Rest rooms at Hanging Flume Overlook with trash cans.
1093	A pull out by the coke oven to providing tourist viewing without trodding on the private land that surrounds the site.
1530	Impacts from uses can be minimized by provision of information in the form of signage and pamphlets in high use areas to educate novices as to what is allowed verses what is not allowed (i.e. impacting riparian habitat). Most prospectors are concerned about the environment. Many clean trash, left by others. If informed of what impacts to avoid prospectors will generally comply and remind others.
594	I would like to see areas made available for horse trailer parking.
219	Signs at intersections and maps at trailheads would be needed.
1095	Rock climb trail signs out by Uravan
618	Official access points for ATV's and motorcycles need to be developed with signs showing motor approved trails.

Table C-4
General Comments Related to the RMP

Comment ID	Comment
2660	This earth is ours to protect from us... please do the right thing for the future of our planet and our country. It is of the utmost importance.
1703	Thank you for your consideration of my comments. I sincerely appreciate this opportunity to be involved in determining management practices that will affect UFO lands for the next 20 years. Our Western lands are very precious, and every effort should be made to protect them, now and for future generations.
1063	Before the BLM begins making rules for the use of publicly owned land based on political correctness, it should make sure it has taken a deep and serious look at the biological sciences, the physical sciences, and human nature. In the long run, you will be administering this land for the landowners, and we will cooperate with your administration of the restrictions of use on this land, if it is reasonable and justified.
1030	The impacts associated are significantly reduced or eliminated through site specific stipulations identified through the NEPA process.
1074	Include the potential for Memorandums of Understanding such as that between BLM and Wilderness Inquiry or NPS and the Wounded Warrior Project.
2661	We must act NOW to stop the destruction of our planet.
273	As a former San Miguel County resident and frequent Western Slope visitor who has hiked and climbed on BLM land and floated much of the proposed Wild and Scenic sections of the river, I am very pleased that the agency is making the effort to include non-consumptive use values. While I am aware of the mandate associated with the agency's enabling legislature, it is exciting to see the Bureau considering the long-term benefits provided by lands managed principally for ecosystem services and mixed recreation.
305	Please listen to the locals, and use common sense when making your decision.
2137	As mentioned the BLM as a multiple-use agency, meaning that management will be accomplished on the basis of multiple-use and sustained yield unless otherwise specified by law, and states that: ...a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and non-renewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output. All alternatives should retain sufficient management discretion for the BLM to permit development of oil, gas and other minerals without improperly committing itself to wholesale conversion of the area from lands containing wildlife habitat, rangeland, watershed, and energy resources into a single-use, industrialized zone, effectively committed to mineral extraction and excluding other uses. The UFO RMP should avoid this single-use situation by recognizing and incorporating the mandate of multiple-use and sustained yield described in the FLPMA.
2682	There are far too many destroyers running things in our land and our government. Help us change that. We must protect our land!
1044	The local residents opinions should be given more consideration than those who do not Jive within the area. Local resident's lives are effected more because of the decisions made by government officials who lack understanding of the area.
303	I feel that you are limiting the farmers, ranchers, and landowners. By this proposed limitation you are impacting the economy in a negative way. This is a depressed area anyway, and your proposals would make it worse.
416	The governments logic is, if there is a complaint from some environmental whacko is to close an area down from and human activity. We need some common sense in taking care of our public lands and some common sense stewardship on the-publics part.
2664	It is not just these lands that are under pressure from such endeavors. Consider the larger impact of multiple sites like this throughout the country. It is like a plague on the countryside. NO. This destruction must stop!
326	changes to administration? To many people in the management department. Make information more public knowingly, make suggestion on changes.
419	I think that all the users of our recreational public lands should use common sense stewardship of the land and water on our public lands.

Table C-4
General Comments Related to the RMP

Comment ID	Comment
1057	I believe that in order to have compliance with regulations, the regulations must be reasonable and understandable. In order to understand regulations, the proposals for such regulations must articulate who, what, how, when, and where of the purpose for regulation.
327	changes to social characteristics? People user's should not have to put on it. Behavior of the people should be leave it like you found it or in better shape.
225	The National Park Service and BLM should continue to share information, partner on projects, and otherwise cooperate on issues that affect the lands we administer near our common boundaries.
2666	If each new government or even generation of people takes large chunks of what is left of our natural resources, there will be little left of any of it.
2662	Geez Louise, can't we leave Mother Nature well enough alone for once?
106	We appriciate the opportunity to operate on public lands.
290	Over all, I think the BLM is doing a good job managing our public lands.
2731	All I am asking for is a balanced use of the area, with the unique features of each district takend into account.
2663	As a Wyoming graduate and longtime Wyo resident, I hope someone will supervise BLM in this process. They have never shown any determination to protect the American public's natural resources, hence, the name management in their title, not protection. Don't expect anything from BLM!
2729	You can protect our one and only Earth. Please think of all that depends on your decisions.
1062	It has been more years than I care to count since I studied the science of ecology, but I do remember and have observed, over the last fifty years, that the earth is always in the process of re-balancing itself. The physical law that says that for every action there is an equal and opposite reaction also applies to biology. The BLM is administering both a physical and biological entity in the Uncompahgre Planning Area.
325	changes to landscape? None leave everything in it natural way.
1019	no changes
1633	My husband and I have started visiting the Dolores River Basin area much more frequently in the last few years, and really enjoy it. Last fall we visited 3 times, going to Gateway, Naturita, Sewemup Mesa and the collapsed Salt Dome area there, and the Uncompahgre Mesa. It was wonderful! It is really a great place for outdoor visiters of all types. Please take care of these wonderful places for all who like to visit there and get away from the crowds and see the beautiful canyons and mesas.
241	Coordination and cooperation Whenever possible, Reclamation and BLM should coordinate and cooperate in resource management across administrative and jurisdictional lines. Supplemental agreements and Memorandums of Understanding (MOU) may be appropriate documents to foster such cooperation. The following areas of general resource management could benefit from such coordination and cooperation: • Wildland fire management • Noxious weeds and invasive species management • Soil management • Riparian and wetland areas • Wildlife habitat • Sensitive species habitat • Recreation • Selenium management
411	I take issue with the government catering only to a small minority of environmental whacko's that want to close access to our public lands because of a fish, bugs, birds, and animals that may or may not live in a certain areas of a river or canyon.
237	Including adaptive management criteria and protocol to deal with future issues.
362	All of the regulations, rules, and management are in place to date to manage the well being and health of our public lands.
2775	b. Cooperating Agencies 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 Uncompahgre 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.
363	There's no need for over regulating our public lands.

Table C-4
General Comments Related to the RMP

Comment ID	Comment
2682	No one is making any more land--this is it.
364	It should stay looking as it has for all these years. If you make modifications to the landscape physically, it is no longer what it once was.
1720	I urge you to seriously consider the comments of Western Colorado Congress and similar citizen advocacy groups, who speak collectively for many of us individual citizens.
2774	a. Public Participation Opportunities We encourage BLM to maximize public involvement in preparation of the revised Uncompahgre RMP. In addition to the public comment periods required by the National Environmental Policy Act (NEPA) and BLM's regulations, there are other opportunities throughout the planning process for public involvement, which are used by many BLM offices. Public involvement allows the public to provide useful information and bring concerns to BLM's attention throughout the planning process. In its scoping notice, the Uncompahgre Field Office already stated its intent to make public participation and collaboration an integral part of the planning process and we commend BLM on this approach. However, we would also encourage the BLM to provide for public input into the management situation analysis and identification of planning issues, and on a preliminary range of alternatives prior to preparing the Draft RMP, steps other BLM offices have taken to expand opportunities for public comment. The Uncompahgre Field Office will need to ensure sufficient data is available in preparation of the RMP. In this context, we would also note that other BLM offices have made inventory data available to the public to assist in identifying new data needs and also made base data available for public use, and encourage the Uncompahgre Field Office to take similar action. By way of example, along with its release of the Draft RMP, the BLM's Arizona Strip Field Office provided zipped GIS files for all data layers needed to create the maps contained in the Draft RMP (and can be viewed on-line at http://www.blm.gov/az/GIS/files.htm#strip). The server space required for this operation is minimal and without this information, effective public participation in this process is severely hampered. This type of public participation is also consistent with the BLM's Land Use Planning Handbook (H-1601-1), which states that, "Documentation supporting the AMS [analysis of the management situation) should be maintained in the field office for public review" (Section III.A.4) and that, "Alternatives should be developed in an open, collaborative manner, to the extent possible" (Section III.A.5). Making analyses available before issuing the Draft RMP is another excellent way to increase public understanding of and participation in the RMP revision. The Kemmerer (Wyoming) Field Office, for example, made their analysis of comments submitted on the Draft RMP and their ACEC evaluations public by posting them on their website months before they issued the Proposed RMP/FEIS(1). Making such analyses available to the public before the publication of the Draft RMP will better prepare participants to understand the complex analyses and large amounts of data in the Draft RMP and increase the relevance and usefulness of comments and other public participation. We hope to see these types of opportunities provided to the many members of the public who are interested in the development of the Uncompahgre RMP. Recommendation: The BLM should make every attempt to encourage the public to participate in the RMP revision including holding workshops, making a preliminary range of alternatives available for public comment prior to preparing a Draft RMP, providing interim information regarding inventories of routes and visual resources, posting GIS files, and posting analyses such as ACEC evaluations and analysis of comments submitted on the Draft RMP to the RMP revision website.
396	There are few places in western Colorado that Brenda and I have not been. One of the reasons for our complete coverage is the great number of roads. There are very few areas left that do not have roads. Of the 48 priority blocks in Region 7, Colorado Breeding Bird Atlas II, in Montrose and San Miguel County there is not one of these approximately 3 mile square areas that does not have a least one road. In checking out maps it is very difficult to find a location in which there is not a road within four miles.
1055	As one of the owners of the land administered by the BLM, I have read through the literature provided at the Montrose, Colorado "Scoping Session." The information does not seem to be well focused but, rather, a compilation of unrelated information. I found references to Federal Code Sections, BLM Regulation numbers, BLM Policy Names, and references to agreements with other agencies. I must admit that I have not even tried to research all the references mentioned. It would take more time to research and digest the information in the references than I have energy and time to expend. I believe this feeling could be expanded to include all the BLM Public Land Users (Owners) that do not have a financial interest in using their land. It might have been easier for me to understand had the various sections included an executive summary of the current plan for each of the sections.
366	Same as it is today and has been for many generations. These are public lands, shouldn't people be able to enjoy

Table C-4
General Comments Related to the RMP

Comment ID	Comment
	them?
371	Get rid of the office Drones in the BLM and Forest Service and put the rest in the field instead of pushing papers. Men AND women!
242	- Reclamation's Managing Entities- Reclamation has several managing entities that manage our projects and/or various aspects of land or resource use on our lands. These entities should be included in the coordination/cooperation aspects of the RMP. • Project Management • Uncompahgre Project- Uncompahgre Valley Water Users Association • Dallas Creek Project- Tri-County Water Conservancy District • Paonia Project- North Fork Water Conservancy District and Fire Mountain Canal and Reservoir Company • Lower Gunnison Salinity Unit (CRBSCP)- Uncompahgre Valley Water Users Association • Smith Fork Project- Crawford Water Conservancy District • Aspinall Unit, CRSP- Reclamation, Curecanti Field Office Division (Montrose) and Western Colorado Area Office (Grand Junction) • Paradox Unit (CRBSCP)- Reclamation, Western Colorado Area Office (Durango) • Bostwick Park- Bostwick Park Water Conservancy District • Fruitgrowers Reservoir- Orchard City Irrigation District • Recreation Management • Curecanti National Recreation Area- National Park Service • Crawford Reservoir, Smith Fork Project- Colorado State Parks • Paonia Reservoir, Paonia Project- Colorado State Parks • Ridgway Reservoir, Dallas Creek Project- Colorado State Parks • Mitigation Land Management • Aspinall Unit- BLM and Colorado Division of Wildlife
251	Community Growth and Expansion- Some of BLM's and Reclamation's lands are at the wildland urban interface. Community growth and expansion is putting more pressure on both Reclamation and BLM to provide lands for open space, recreation, and community infrastructure.
2706	I would also like to examine the EA/DN/and FONSI or the DEIS for the plan. The blm is not exempt from NEPA.
304	Less government regulations.
2776	c. Protection of Natural Resources The Federal Land Policy and Management Act ("FLPMA"), 43 U.S.C. § 1701 et seq., imposes a duty on BLM to identify and protect the many natural resources found in the public lands governed by the Uncompahgre RMP. FLPMA requires BLM to inventory its lands and their resource and values, "including outdoor recreation and scenic values." 43 U.S.c. § 1711(a). 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) (http://www.blm.gov/rmp/kemmerer/docs.htm). Through management plans, BLM can and should protect wildlife, scenic values, recreation opportunities and wilderness character in 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 importance of various aspects of wilderness characteristics (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). Under FLPMA, BLM is also obligated to "give priority to the designation and protection of areas of critical environmental concern [ACEC]." 43 U.S.c. § 1712(c)(3). ACECs are areas "where special management is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes." 43 U.S.c. § 1702(a). For potential ACECs, management prescriptions are to be "fully developed" in the RMP. Manual 1613, Section .22 (Develop Management Prescriptions for Potential ACECs). ACECs also include Research Natural Areas (RNAs), established for their significant biological and physical features, including plant or animal species or geological, soil or water features. RNAs have "ecological or other natural history values of scientific interest" and are managed for research and educational purposes. Outstanding Natural Areas (ONAs) are another type of ACEC, established to preserve scenic values and natural wonders. ONAs contain unusual natural characteristics and are managed primarily for educational and recreational purposes. The resources in the Uncompahgre planning area include many values that merit protection through special designations. Protection of existing ACECs and due consideration of proposed ACECs, including RNAs and ONAs, must be a priority in the Uncompahgre RMP planning process. In addition, there is no per se bar to managing and protecting the many values of these lands through overlapping designations, such as Wilderness Study Areas (WSAs) and ACECs or Special Recreation Management Areas (SRMA) and Wild and Scenic River Segments. For example, BLM's Jarbidge RMP (and subsequent amendments) in southern Idaho designated the Bruneau/Jarbidge River ACEC and the Salmon Falls Creek ACEC, which overlap the Bruneau River-Sheep Creek WSA, Jarbidge River WSA, and lower Salmon Falls Creek WSA, and

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	includes the Salmon Falls Creek, deemed eligible for inclusion in the National Wild and Scenic Rivers System. See BLM, Jarbidge Field Office, Idaho, Analysis of the Management Situation for the Jarbidge Resource Management Plan: Resource Management Plan/Environmental Impact Statement at 212-216 and Figure 39 (locations of Current ACECs) (July 2007), available at http://www.blm.gov/pgdata/etcfmedialib/blm/id/plansfjarbidge rmp/documents/analysis of the management.Par.59385.File.datlpart13.pdf; Figure 40: Wilderness Study Areas, available at http://www.blm.gov/pgdata/etc/medialib/blm/id/plans/jarbidge rmp/documents/analysis of the rnanagement.Par.18048.File.dat/part14.pdf (excerpts attached to these comments). These overlapping designations ensure that BLM protects both the relevant and important values associated with the ACECs and the wilderness character of the WSAs, both through current management and in the event WSAs are released during the life of the plan. In certain situations, overlapping designations are needed to fully protect the resources, for example IMP management of WSAs might differ greatly from the special management attention envisioned for the relevant and important values of a particular ACEC or in the event of congressional WSA release. In addressing objections to "layering" of designations (through "establishment of ACECs or SRMAs over WSAs and Wild and Scenic Rivers") raised in connection with the Monticello (Utah) RMP, the BLM responded, appropriately: "Layering" is planning. Under FLPMA's multiple use mandate, BLM manages many different resource values and uses on public lands. Through land use planning BLM sets goals and objectives for each of those values and uses, and prescribes actions to accomplish those objectives. Under the multiple use concept, BLM doesn't necessarily manage every value and use on every acre, but routinely manages many different values and uses on the same areas of public lands. The process of applying many individual program goals, objectives, and actions to the same area of public lands may be perceived as "layering". BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Inconsistent goals and objectives can lead to resource conflicts, failure to achieve the desired outcomes of a land use plan, and litigation. Whether or not a particular form of management is restrictive depends upon a personal interest or desire to see that public lands are managed in a particular manner. All uses and values cannot be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses can be considered together to determine what mix of values and uses is responsive to the issues identified for resolution in the land use plan. Layering of program decisions is not optional for BLM, but is required by the FLPMA and National BLM planning and program specific regulations. FLPMA directs BLM to manage public lands for multiple use and sustained yield (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans. BLM's Land Use Planning Handbook requires that specific decisions be made for each resource and use (Planning Handbook "H-1601-1"). Specific decisions must be included in each of the alternatives analyzed during development of the land use plan. As each alternative is formulated, each program decision is overlaid with other program decisions and inconsistent decisions are identified and modified so that ultimately a compatible mix of uses and management prescriptions result. Monticello Proposed RMP, Response to Comments, comment no. 007-48 (attached). As clarified by the BLM, because different designations serve different purposes, and management is often limited to protect only those values relevant to those particular designations, the fact that an ACEC may lie within a WSA does not justify failing to designate the ACEC and the fact that a proposed SRMA may overlap with an ACEC does not obviate the need for the SRMA. Recommendation: The BLM must uphold its responsibility to protect the abundant natural values present in the Uncompahgre planning area when developing management alternatives in the Uncompahgre RMP and evaluating their environmental consequences, as required by both FLPMA and NEPA, 42 U.S.c. § 4321 et seq.
1031	Enforce the procedures already on the books.
386	I am born and raised in the country and/or on ranches my entire life. I have always had a deep respect for the outdoors, wildlife, the ranching heritage I come from, and the enjoyment of the areas I have lived in being available for the public to utilize and appreciate as well. I have always had a deep respect for the BLM and Forest Service agencies that my family has worked closely with over the years as they are official stewards of the land as we as the public and livelihoods are as well. There was a time that these Government entities worked closely with all who are involved in these public lands and waterways, having respect for the economy boosting ranchers and farmers that make their modest living from these lands as well as genuine respect for the land in question for reasons of benefit to the land, and a genuine desire to allow all involved fair and just consideration in any decisions made on the lands. It seems however that these days, the BLM has shifted to

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	making their proposals geared towards tourism and recreational purposes solely and leaving behind realistic beneficial proposals for the wildlife, the local economy, local ranching heritage and local history. It seems that particular interests are being catered to, and the rest of all of our interests are no longer acknowledged.
240	Effects on or by Reclamation projects- The above listed projects and their associated withdrawals, facilities and resources are valid existing rights pursuant to Reclamation law. The potential effects of BLM decisions on the operation, maintenance, and protection of Reclamation projects, and associated ands, facilities and resources need to be recognized and addressed. Also, the effects of these projects and their associated withdrawals, facilities, and resources on your decisions should be considered
1017	No changes - leave it the way it is - in its natural state.
276	Given the unique recent and ancient history of human habitation in the area and the hardy and vibrant native flora and fauna, I strongly support RMP directives that encourage sustainable use of this landscape over extraction or exploitation of its resources. While the latter tends to produce immediate and lasting degradation of scenic beauty and ecosystem function, the stewardship of the former can support both healthy local economies and future generations' enjoyment of the Uncompahgre Plateau.
412	I am concerned about the lack of common sense in managing our public lands.
1614	Leave the landscape alone!
1029	The RMP and EIS will go beyond the current NEPA process will become so restrictive that business and recreation will no longer be possible on BLM lands.
1656	I understand the Public Lands mission of multiple use. However, it is equally important to weight use of resources with the ultimate loss of resources.
375	Natural resources are for our use, not to be closed off from the public to "preserve" them.
1713	I am one-half owner of three miles of property bordering both banks of the Dolores River in Montrose County. It goes without saying that I am intensely concerned about protecting the integrity of the area, its natural beauty and its geological resources.
1654	The above letter is obvious. Its amazing to me though how easy it is to be swayed by lobbiest perswasive desires. I remind you there is only one earth so please take utmost care to see that its FOREVER useful. Not just temporaraly exploited for short term energy gone quickly leaving behind a scar that lasts much longer.
235	The preliminary planning criteria identified in the Preparation Plan help identify and explain the respective roles and responsibilities of Reclamation and BLM with regard to the RMP and the respective management of their lands within the planning area. Planning criteria related to Reclamation lands and resources include, but are not necessarily limited to: - Compliance with the Federal Land Policy and Management Act (FLPMA) and all other applicable laws, regulations, and policies. - Lands covered in the RMP include public land, and split estates managed by BLM. No decisions will be made relative to non-BLM administered lands. - Working cooperatively with the State of Colorado, tribal governments, county and municipal governments, other federal agencies, the Southwest RAC, cooperating agencies and all other interested groups, agencies, and individuals. - Striving for compatibility with existing plans and policies of adjacent federal agencies as long as decisions are consistent with the purposes, policies, and programs of federal law, and regulations applicable to public lands
270	Delta County appreciates the opportunity to submit general comments in response to the Uncompahgre Field Office's (UFO) request as part of its scoping for the Resource Management Plan (RMP) revision process. The County's comments address the importance of continuing to manage resources on the BLM lands in our County and neighboring counties for multiple use opportunities. The public lands are an integral part of Delta County's social fabric, local economy and healthy environment. BLM lands comprise a significant portion of Delta County's open space and resource area, a fact that places a need for a greater awareness of the potential impacts any revisions may have on current uses as they impact our local economy and quality of life. Revisions which may in one way or another permanently restrict or change the available usage and access to BLM lands or mineral interests should be carefully considered.
413	I am concerned about our government view that if your not an environmental whacko you shouldn't have access to our recreation lands such as receational prospecting, and fishing.
1032	Public lands are just that public everyone has the right to use.

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356	In the 1991UFO RMP it was unclear what map/data sources were used for energy potential ratings. Later on (see David Burgess et al v. BLM IBLA No. 2006-117) it was not clear where BLM was drawing its rating of oil and gas potential for the area from. Several different conflicting and inappropriate scale data sources were cited. All data sources used as underlying significant data for the RMP should be clearly documented, readily available to the public and such documentation should include caveats on the data or its use.
2798	The BLM should consider input from regional conservation plans. Several regional conservation plans have been developed which include this field office. The BLM should consult the following sources during the RMP revision: Southern Rockies Ecosystem Project's Southern Rockies Wildland Network Design The Nature Conservancy's Colorado Plateau Ecoregional Plan The Nature Conservancy's Southern Rocky Mountains Ecoregional Plan Heart of the West Conservation Plan Roadless areas, Citizens' Proposed Wilderness, wildlife corridors identified by Southern Rockies Ecosystem Project, and Colorado Natural Heritage Program Networks of Conservation Areas not mentioned above are also important resources that the BLM should consider in this round of planning.
1682	All places that hold special value should be managed for the future.
278	The area included in the RMP boundaries contains some fantastic "wild places". In a West that continues to urbanize and develop rapidly, these places (especially those outside of the rocky mountain ridges that often fall under USFS jurisdiction) are increasingly valuable. I would like to see an end to further road construction; better designation of OHV use and non-use areas; the elimination of non-renewable energy development and careful consideration of the footprint associated with any renewable energy projects such as solar or wind installations; and continued maintenance of facilities such as the (very much appreciated) picnic/camp areas on the San Miguel.
274	Increasingly we hear of potential conflicts among the various uses on public lands; however it is critical to the well being of our constituents and our local economy that the concept of multiple use is protected and a balance in the management of resources is sought as the UFO commences its RMP revision process.
232	We would remind you the current 1983 National Interagency Agreement (IA) between the Bureau of Reclamation (Reclamation) and the Bureau of Land Management (BLM). The 1983 IA spells out the role and responsibilities of Reclamation and BLM on Reclamation's acquired and withdrawn lands. The RMP should identify and help enforce those roles and responsibilities through all alternatives. A copy of the IA is attached for your information.
234	We would also remind you that Reclamation's land management focus is not the same as BLM's. Our main focus is management of lands and resources for Reclamation project purposes pursuant to Reclamation law and policies, plus other nationwide laws such as the National Environmental Policy Act, and the Endangered Species Act. Non-project uses of Reclamation lands must be compatible with the authorized Reclamation project purposes and be approved by Reclamation.
361	All of the regulations, rules, and management are in place to date to manage our public lands for multiple use,
496	I believe the way the current BLM administration is managing the resources in this unit is a win/win for the public and the caretakers.
1043	We live here because it has been our home for generations, we love the lifestyle and want to preserve it.
2338	All of these resources are finite, and essential to the survival of our species. They should not be squandered for the private gain of a few individuals.
810	Open public lands to all uses. Reduce regulation.
2337	Protecting these areas should be a national priority because, as the songwriter, Joni Mitchell, wrote, "...You don't know what you've got, 'til it's gone".
2335	Only when the last tree has died and the last river has been poisoned & the last fish has been caught will we realize that we cannot eat money.
896	Public land should remain just that. Multiple uses should be the way to go.
756	Exactly as the Good Lord meant it to look like
893	Leave it alone as it is.
2332	Please help protect this amazingly beautiful part of this country. Our wilderness areas are becoming more

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	precious as the country becomes more populated, and these areas should not be put in jeapordy.
890	Closing Comments: In reviewing all of the information in this project, it is overwhelming. I wish I had more time to further research these topics by talking to BLM staff and finding info on the internet. As it is, I have spent14 hours reading the website and info I picked up at the Pavilion and typing up my comments.
29	Personally, I would make no changes to the landscape.
2275	Engineering guidelines. Because gas production practices change rapidly, the BLM Gold Book should be updated frequently to ensure that it mandates best practices.
619	In reference to the recent proposal to further restrict the public use of BLM-controlled land, I would like to encourage the BLM to continue to allow responsible use of public lands.
1179	Energy development, recreational use, grazing, and related activities are among the planning activities requiring management, mitigation, and monitoring. Various impacts can be minimized or potentially eliminated if BMPs and other mitigation measures are properly implemented. Details should be provided for accomplishing these activities in the RMP/EIS. Also, it is important to specifically designate what entity (e.g., BLM, the proponents, resource organizations, or some combination) will be in charge of which activities, and which will have specific and enforceable accountability. In addition, the BMPs, mitigation measures, and other related activities require inspection, documentation, and recordkeeping. A "paper" documentation trail must exist to determine what was monitored, inspected, maintained, and completed. All management, mitigation, and monitoring should be verifiable, and an agency/entity needs to be held accountable for performance oversight, throughout the entire project construction and operating life. It may be appropriate for the proponents to fund an account from which 3rd party contractors can perform inspections and monitoring, and/or the implementation of some of the mitigation measures. Please provide details on these issues in the EIS, preferably in a separate monitoring plan. It may also be appropriate to have commitment for these activities placed in the Record of Decision.
1830	The Uncompahgre Field Office encompasses some of Colorado's most beloved wilderness-quality lands, wild rivers, and opportunities for quiet, backcountry recreation.
2509	Earth is a CLOSED BIOSYSTEM. The destruction and contamination resulting in habitat destruction severely impacts our planet's ability to survive. Thus human survival.
2061	We urge the BLM to work with other agencies as well. Some of the outstandingly remarkable values identified in the Dolores River Corridor -fish species, plant species, and recreational boating -depend on a healthy functioning ecosystem, adequate stream flows, and well managed spills from McPhee Reservoir. We urge the Uncompahgre Field Office of the BLM to work with water managers (including the Bureau of Reclamation and the Dolores Water Conservancy District) as well as adjacent BLM field offices, The Dolores River Dialogue, conservation groups, boaters (both private and commercial), and other stakeholders to ensure that outstandingly remarkable values of the Dolores are maintained and enhanced and that viable flow regimes are developed for both the benefit of the ecosystem and boating.
1403	I believe the BLM should state unequivocally in the revised RMP that it is fully committed to managing publicly owned lands in a way that ensures both the health of the land and the people who live in and around those lands.
2547	Please help ensure a complete and healthy ecosystem for our children and grandchildren! The Woodzy Family
2539	Theodore Roosevelt dubbed the Uncompahgre "Incomparable." Only one thing can keep it that way: protection.
2535	In a very general way, we should strive to be the very best possible stewards of the resources entrusted to us.
2066	The Dolores River corridor requires coordinated management in order to preserve these resources for the future.
2531	We must take our individual and agency responsibilities for protection of the physical and spiritual resources of these lands seriously, and use that to guide our decisions. It is sometimes not so much that we don't know what to do, but that we lack the moral energy to stand firm in the face of opposition. These lands deserve the very best human protection. Please act accordingly.
806	restricted access and over regulation
575	Working together, we can mutually promote and direct the activity that takes place on the BLM Lands in

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	Montrose County to the benefit of the largest portion of potential participants. Montrose County can be most especially helpful to the BLM by working in and with the private sector promoting communication and information.
634	Since the purpose behind revising land management plans is to account for new inventories, changed circumstances, and new information—all broadly defined at this level of NEPA—and to manage all the public's resources in a manner that promotes sustainability, restores healthy ecosystems, stabilizes and strengthens area wildlife populations, and safeguards sensitive species, including sensitive plants, BLM must give top priority to these outcomes.
900	Largely a waste of time and tax payer money. Colorado needs to focus attention on the Russian Olive Invasion. Nothing will be scenic after they take over.
590	Non-recreational uses should also be managed to minimize impact to the environment.
2515	I have spent priceless days in southwestern Colorado. I hope others will be allowed to experience similar time there. This place is too special to be mistreated.
2342	Again thank you for your careful consideration. As you know, and we all have learned from past experience, once gone these valuable resources are hard to restore.
592	BLM should be able to collect sufficient fees/income from non-recreational users to cover administration costs and impact to the land.
892	Many places just have to be left alone. People need to do nothing else except walk in and out, NO extraction of minerals, hunting, renewable energy, collecting, harvesting, outfitting, fishing, motor vehicle or boat use, spraying of pesticides or herbicides, livestock grazing. We have to have some places that are sacred!
757	As few (changes) as possible
573	Mission critical communications is key to our partnership. Mutual recognition of the value of what can be gained from a closely communicated relationship would and is a powerful tool.
1947	The planning process and RMP will endeavor to serve as a platform for cross-boundary cooperation. The Plan will provide a foundation for collaborative efforts with many stakeholders that may extend beyond planning to cooperative land management and grant funding.
1351	That public lands administered by BLM within the RMP be managed for multiple uses
2435	WE MUST BE THE STEWARDS OF THE LAND!!!
698	No changes need to be made to the landscape. It should be left as it is.
2415	We need to preserve this earth for future generations, your grand-children and mine.
84	Please continue to provide the multiple users of these natural resources [mineral deposits] the opportunity to make comments on the behalf of the constituency.
1287	LeValley Ranch, Ltd has worked cooperatively with the UFO for many years and views this as a mutually beneficial partnership
1917	Citizens For A Healthy Community was informed by Bureau of Land Management (BLM) staff at the January 12 Open House on the Resource Management Plan (RMP) revision, and again in a meeting with BLM staff at the Uncompaghre Field Office (UFO) in Montrose on January 19 that comments made during a public comment period are not considered a vote. Citizens For A Healthy Community can't help but ask why BLM has gone out of its way to make this statement on two occasions? What message are we to take from this statement? While we understand that public comments are not weighed strictly by a vote tally, this statement raises a red flag to all Americans who have a right to participate in the National Environmental Policy Act (NEPA) process and feel their voices are not only heard, but also reflected in the Record of Decision (ROD). A particularly egregious example of ignoring the voices of the American public occurred in 2003, when the National Park Service (NPS) prepared an Environmental Impact Statement (EIS) on winter use in Yellowstone National Park. In one of the largest turnouts of public comment in NEPA history, approximately 360,000 people submitted comments on the draft EIS. More than 80 percent of the comments supported an alternative calling for the phase-out of snowmobile use in the park. In the ROD, the NPS ignored public comment and selected an alternative that continued snowmobile use in the park. This practice of federal agencies seeking public comment and then ignoring the will of the American people makes a mockery of public involvement and violates both the spirit

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	and letter of the law. While marking the 40th anniversary of NEPA on January 4 of this year, President Obama said: Today, my Administration will recognize NEPA's enactment by recommitting to environmental quality through open, accountable, and responsible decision making that involves the American public. Our Nation's long-term prosperity depends upon our faithful stewardship of the air we breathe, the water we drink, and the land we sow. With smart, sustainable policies like those established under NEPA, we can meet our responsibility to future generations of Americans, so they may hope to enjoy the beauty and utility of a clean, healthy planet. The President went on to say: I call upon all executive branch agencies to promote public involvement and transparency in their implementation of the National Environmental Policy Act. Rather than promoting public involvement, BLM's statement that public comments are not considered a vote has just the opposite effect. This remark has the potential for reducing the number of public comments because it encourages apathy. After all, why should citizens submit comments if they are not going to be counted? In particular, this statement appears to be aimed at citizens' groups that urge their members to submit similar or identical comments on form letters, postcards, or via email. BLM apparently wants these groups to know in advance that these types of comments do not have any influence on the agency. The message to citizens' groups is loud and clear, "Don't bother inspiring your supporters to participate in the public comment period because the BLM isn't listening." Citizens For A Healthy Community calls on BLM to cease telling the public their comments are not considered a vote and instead ensure the public's voices are not only heard, but also reflected in its decisions.
1217	It is our hope that the recommendations we provide will assist the BLM in protecting some of the most sensitive, beautiful and scientifically valuable features that occur within the UFO.
1914	Data Quality Act. 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.
2398	We speak for those who cannot. All creatures big and small deserve a place on our planet. Thanks you.
2396	Thank you for providing the regulation in your plan that was shortchanged by the last administration in its headlong rush with ONLY economic objectives in mind.
730	The rules and regulations are fine with me as they are.
732	Maybe people should have more education on how to use not abuse our public lands. Also do not listen to people do not live in the area. That includes environmentalists and mountain bikers who do not want other groups to use our public lands. These lands belong to all of the people, not just a select group of people.
2329	I urge you to think "Open Space First" as you proceed with this process.
735	I don't think you should change anything. It works well now.
736	Unreasonable prohibitions against using public lands. Current and proposed policy prevents the use and enjoyment of public land. These restrictions allow only bureaucrats (you) and the young wealthy to enjoy the land. Your current and proposed policy and restrictions promise disaster and economic hardship. If huge fires, diseased trees, wildlife to numerous for the land to support, wasted natural resources are your goals, then you are right on track.
717	It is clear that the groups pushing this plan are more interested in hurting people than caring for the land.
1899	BLM should not allow redundant planning issues and planning criteria narrow the range of Alternatives and/or diminish the agency's multiple-use/sustained yield mandate. Our understanding is that a planning issue is a matter of controversy or dispute over resource management activities or land use that is well defined and

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	entails alternatives among which to choose. Planning issues may be a concern expressed by the public, state/local government or other stakeholder, and may include concerns about potential serious deterioration of public land, significant impacts or conflict, or uses that may not be in the best public interest. Planning criteria are different, usually described as "sideboards" or parameters established by laws, regulation, policy or other planning guidance. When examining the UFO's preliminary planning issues and planning criteria we find quite a few of them are redundant. For example, management of native species and protecting cultural and historic resources are directed by existing law, regulation and other planning guidance. The UFO has properly identified the relevant regulations in the planning criteria that address these "issues." In reality, there are really very few, if any, alternatives from which to choose. Controversy over the management of these issues is moot, at least insofar as the development of the RMP. The concern our members have is that redundant planning issues and criteria serve to diminish the focus on the agency's multiple-use and sustained yield mandate, and, perhaps more importantly, unlawfully narrow the range of Alternatives. FLPMA Sec. 202, particularly subsection (c)(1) that specifically requires development and revision of land use plans on the basis of "principles of multiple-use and sustained yield." FLPMA section 102(a)(7) also specifically requires that "goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple-use and sustained yield unless otherwise specified by law." 43 C.F.R. 1601.0-8 provides, "The development, approval, maintenance, amendment and revision of resource management plans will provide for public involvement and shall be consistent with section 202 of the Federal Land Policy and Management Act of 1976. ..." 43 C.F.R. 1610.4-4 states, "The analysis of the management situation shall provide, consistent with multiple-use principles, the basis for formulating reasonable alternatives, including the types of resources for development or protection." 43 C.F.R. 1610.4-5 states: "All reasonable resource management alternatives shall be considered and several complete alternatives developed for detailed study..." We know we are droning on a bit here, but we hope the planning team will not let multiple, redundant planning issues and criteria stop them from developing alternatives which embrace the multiple-use sustained yield mandate place upon the Bureau by Congress.
1189	The County Open Space Commission works to protect and conserve open space for people, natural habitat for flora and fauna, and agricultural lands for the farming and ranching communities throughout San Miguel County for this and future generations. To date, we have facilitated conservation easements on 10,520 acres of high quality open space, habitat and agricultural lands. We are very grateful to BLM personnel who have for many years championed protection of the San Miguel and its many resource values.
1337	Not to mention NIMBY. We recognize you will hear specious arguments from those who simply desire no such activity to happen here. While some residents will be amongst the objectors, many will not be area residents whose livelihoods and supper depend upon mining, but rather outsiders who basic needs are more than met and have made this a cause celeb.
644	I would also like to see the BLM take a role of using our public lands for the common good of the people, and not just a conservation/preservation agenda.
1895	The OHV community also supports the need to revise Land Use Plans in response to changing conditions.
651	I would encourage the BLM to consider the average citizen when making land management decisions. Many people who use public lands are not aware of Travel Management Plans or any other changes in how land is managed. The typical citizen might only use public lands few times a year and doesn't have the resources or knowledge on how to get involved in these types of decisions. It would seem the well organized and well funded conservationist/environmentalist groups are the most vocal and are always pressuring the BLM and Forest Service to further restrict the public from public lands, while the public is unaware of these changes until it is too late and the land is already locked up. Every single year there is yet another Wilderness proposal before congress, this year alone there are at least 3 major pushes for more Wilderness in Colorado alone.
2030	The entire river basin spans numerous BLM and US Forest Service offices and should be cooperatively managed to ensure that the river's serenity and beauty can continue to be enjoyed and explored but never exploited or taken for granted.
685	San Miguel County has a long-standing recognition of the contribution of agriculture and ranching to the traditions and character of our county. This is reflected in our land use policy and taxpayer funded preservation efforts. However, mining and agriculture combined account for only 2% of the jobs in San Miguel County according to the study cited earlier. Consequently, we request that BLM include in the alternatives to be considered a true land health and restoration alternative. This alternative should have as its guiding principle

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	that management decisions must result in moving toward the goal of all BLM lands meeting the Rangeland Health Standards for Soils, Riparian Areas, Healthy Communities, Threatened and Endangered Species, and Water Quality. Adherence to this principle should shape and inform other management decisions regarding travel management, requirements placed on oil and gas and mining development, and appropriate levels of use by domestic livestock. Particular attention should be devoted to improving plant communities. Improving plant communities to match site potential protects soils, water quality, visual attributes, wildlife populations and diversity, and air quality. BLM should work to restore biological soils crusts to their historic role in desert ecosystems. BLM needs to develop within this policy a robust monitoring and evaluation system to measure movement in achieving these goals. The system must be able to validate management decisions in a timely manner. BLM must be able to provide defensible justification for changes in management that restore a fully functioning landscape. This alternative should also include provision for assessing the impacts of climate change (as should all alternatives) and identifying what changes in management will be made to mitigate the impacts of these changes on BLM lands. We look forward to working with BLM throughout the process to create such an alternative.
1329	Not that BLM won't hear a thousand great ideas from non - residents of how something else can work or why residents should do something else. We would ask if that such is in fact the case, then why hasn't it happened already? Not to mention just who are they to say how another American should live and what their dreams and aspirations for their families should be? And where is the investment and business plans supporting these great ideas?
593	I am not opposed to fees for recreational users if they are also needed.
1900	Concern over the diminished role the multiple-use sustained yield mandate over current land use plans. (Important note: Our suggested issue number 1 is based on the assumption that the agency will not amend any of its preliminary planning issues pursuant to our comment in Section E above.) The agency, as well as numerous academic studies have documented the controversy over multiple-use sustained yield mandate and society's increasing value of conservation and preservation of public lands. In addition, over the last two or three decades, a lot of land has been removed from multiple-use management via land use planning and legislation. Like the amount of routes available for motorized uses, the of lands under true multiple-use management has reached a critical mass. Every single acre that is removed from multiple-use management is extremely important. And as noted above, many of the preliminary planning issues and planning criteria are redundant and will server to further diminish the agency's multiple-use sustained yield mandate. We request "The Diminished Role of Multiple-use Sustained Yield Management" be identified as a planning issue and brought forward for analysis. The BLM should briefly discuss the role of multiple-use sustained yield had in the passage of The FLPMA, and its importance to states that are "blessed" with huge amounts of federally managed lands. In response to this issue, at least one Alternative should seek to enhance multiple-use sustained yield management across the planning area.
1902	We have a few comments on potential planning issues identified in BLM's Notice of Intent. Regarding: - Managing vegetative and water resources, terrestrial and aquatic habitat and special management areas, while sustaining biological diversity and native species populations; - Managing mineral, renewable and nonrenewable energy resources; - Managing and protecting cultural, historical and paleontological resources and Native American religious concerns; All of the "issues" above are already addressed withing the agency's planning criteria (law, regulation and other planning guidance). Inclusion of these issues only serve to provide "another bite at the apple" for preservationist interests who are unhappy with the BLM's lawful multiple-use sustained yield mandate. These "issues" should be removed.
1904	Regarding: - Inclusion of adaptive management criteria to deal with future issues. The public would benefit from a clear understanding of what adaptive management is, and how the criteria is applied, and what changes they may require insofar as future management decisions.
1906	The BLM has a Congressionally-mandated multiple-use mission, which must be upheld and not compromised by the single-use land management objectives promoted by certain interest groups.
2452	If we don't act to protect the land, air, and water, we're doomed to pollute ourselves as well as what we eat and drink and breathe.
2450	My father was born and raised o the Western Slope. To my family this land is very special, alsmost sacred. The Black Canyon of the Gunnison is unlike any place in this country

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2442	This is the time to stand for a sustainable future for our children and grandchildren.
1898	We understand that this is water under the bridge, but the public would benefit by more detailed discussion regarding the difference between a planning criteria and planning issue in the scoping materials.
1829	I think the public should be able to use the land, roads, etc. openly under the rules and laws already in place.
1087	When preparing the Uncompahgre RMP the BLM should not attempt to make site-specific decisions, but should develop only broad management goals and objectives.
124	The BLM lands of Western Colorado mostly consist of the lower lying geographical areas prior to the start of the National Forests. These areas have been successfully managed by the BLM for years as multiple use area for all user groups. TMW major concern during the Resource Management Plan process is the tendency of the current Federal agencies to stray from the multiple use concepts of public land management. Recent history has show the acceleration of the land management agencies toward the more restrictive environmental concept that sometimes is factually questioned by science, past history or on the ground experience. TMW encourages the BLM to be cognizance of such concerns in RMP planning and future TMP.
1089	Based on the BLM's own policies and binding legal precedent, the BLM should ensure that the agency does not utilize the land use planning process to impose site-specific conditions of approval or unreasonably limit future management actions.
1137	When creating the purpose and need statement for this project, please describe how the resource management issues to be addressed have evolved since the existing 1985 and 1989 plans were developed. The purpose and need statement should remain broad enough to encompass an appropriate range of alternatives to meet a defined project purpose, including the proposed action and other methods available
188	I would truly like for everyone to be more tolerant of other user groups, treat each other with respect and realize we all enjoy the same outdoors for the same reasons. This goes for both motorized users and non-motorized users.
184	I would also like to see the BLM take a role of using our public lands for the common good of the people, and not just a conservation/preservation agenda.
790	I wish it would not take a full 4 years to complete.
2187	We urge the UFO to control and strictly limit gas production, mining, motorized recreation, and other uses that threaten the long-term health of natural ecosystems
2193	We note that multiple use of public land should not be interpreted to mean that all uses can or should coincide in all areas. The “natural” values listed above are generally lost when lands are opened to commodity production. Therefore, land must be set aside specifically for natural ecosystems in which degrading uses are prohibited
976	Promote respect for the land's intrinsic values - wildlife, solitude, clean air and water.
1775	Please make wild-life and wild-lands a priority because it is these resources that sustain human life. It is our responsibility to protect that which sustains us!
1104	No modifications are needed.
1105	The fewer rules and regulations, the better off the river will be.
1086	When preparing the Uncompahgre RMP the BLM must clearly understand the role and purpose of a land use plan. Pursuant to the Federal Land Policy and Management Act of 1976 ("FLPMA"), the BLM is required to develop land use plans to guide the agency's management of federal lands under its administration.
499	Education is the key to good management of our lands. Whether it is recreational 4-wheelers, jeeps, or motorcycles staying on existing roads, trash haulers dumping trash, hunters being ethical, cattle grazers using holistic approaches, it all begins with education and respect for the land.
2352	Private industries should find privately owned property to mine, drill, etc. America has sold its mineral rights too cheaply to shameless profiteers. Countries that were more wise do not have federal deficits like ours, nor do they have reckless polluters like Exxon that tie up our courts for decades rather than responsibly cleaning up their messes. We hold our public lands in trust for future generations of Americans. They are not ours to diminish or destroy.

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2580	Having explored this area one summer with my husband, Larry, and delighted in its beauty, we consider it a treasure.
178	I believe the BLM has a difficult job in finding a balance between recreation, conservation and use for the good of the public.
2584	Two years ago I was constantly assured that the Bush administration was responsible for the degradation of our national environmental heritage. The Obama administration would reverse that. Here's a chance to prove something.
2585	Thank you for the opportunity to comment on the Uncompahgre RMP revision. This is the 21st century, there is no more west to run to, and whatever can be done to protect what is left, will be a plus for all life on this planet, including us.
967	I believe everyone should experience the outdoors, so let em' all come. Negative environmental behavior will change through education based in fact, and opportunities for the public ownership to police its ranks.
501	Currently, the management plan allows for multiple use of our BLM lands. I would not change any or existing management policies, except the Tabeguache Wilderness Study area. Why Red Flag area for human exploitation. The United States needs to be able to grow and develop natural resources if we are going to continue to be a world power and maintain a great quality of life.
964	I am concerned about the environment, the health and welfare of the land, animals and all who (comment cut off in PDF)
2598	Please protect nature!!!
2604	Western Watersheds Project is concerned with the lack of any meaningful requirements or direction in RMP's developed over the last decade. We hope the Uncompahgre Field Office does not take that approach.
489	In general, I feel that our public lands are a precious resource, to be stewarded with the goal to maintain healthy natural environments for the plants and animals (including humans) who live and visit there.
158	On another note, the BLM must confine the analysis to issues and standards of conduct that BLM has clear authority to regulate. As an example, BLM clearly has authority to define locations suitable for the collection of gravel. BLM does not have authority to determine the season of use for hunting.
481	Physical changes to the landscapes do not apply.
2570	Please remember that economic cost-benefit analysis is not the most important measure of value.
2594	NO MORE DEVELOPMENT. Too much is enough already
192	I also feel more land needs to be made available for the publics good, including resource exploration, powerline construction, and general community uses.
30	Open space, agriculture, grazing, and wildlife is important to me and to the Colorado's future.
1142	The EIS should examine the cumulative impacts of development. In determining whether a project may have a significant effect on the human environment, it should analyze direct and indirect effects, including past, present, and reasonably foreseeable future activities. The impacts should be analyzed according to airsheds and watersheds, for example, rather than political boundaries. The purpose of a cumulative impacts analysis is to assess the incremental impacts on each resource of concern due to connected and unconnected actions that take place in a geographic area over time (i.e., past, present, and future) no matter which entity (public or private) undertakes the actions. A cumulative analysis aids in identifying the level of significance of those impacts on a particular resource and the appropriate type and level of mitigation required to offset the current proposal's contribution to these impacts. In the analysis of present and reasonably foreseeable future actions, it is appropriate to examine anticipated activity trends in the study area, not just already approved "on-the-ground" projects. Examining activity trends in other areas with similar uses and contributory metrics can be useful in this analysis. Also, the appropriate area of consideration and the time frame to use when assessing cumulative impacts will vary for each resource under consideration. The cumulative effects analysis should take into account the effects of reasonably foreseeable growth in energy development in the area and its effects on the air and aquatic resources. The indirect impacts of development should also be analyzed. The project may not affect the location of the expected growth, but it may affect the timing and. Amount of growth.
1141	The EIS should examine the RMP's direct, indirect and cumulative impacts to the cultural, recreational, and

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	resource characteristics of the Uncompahgre Field Office planning area. Among other things, this review should assess any impacts to airsheds in mandatory Class I Federal areas (e.g., Black Canyon of the Gunnison National Park and Wilderness Area, West Elk Wilderness Area, and Maroon-Bells-Snowmass Wilderness Area), watersheds under special management considerations (e.g., Wild and Scenic Rivers), and threatened, endangered and/or sensitive species.
1819	Same as it is today and has been for generations. These are public lands shouldn't people be able to enjoy them.
1140	Each alternative in the EIS should explicitly include identification of appropriate mitigation where impacts are expected. The description should include designation of the entity responsible for implementing the mitigation, the funding source, and specific temporal milestones to meet rehabilitation standards.
997	In general, I believe that our public lands should be managed first and foremost for preservation of the resources they contain, and secondly for uses such as recreation, hunting and grazing, and thirdly for extractive uses like mineral extraction and wildlife and timber harvest. Public lands should be a legacy for future generations, and I want them passed on in as good a condition as possible. The need for nature and natural areas will only grow as our population expands--it will not become obsolete. But nature must not be seen as a collection of specimens to be kept in a museum. Nature is an interconnected web, and as such should be protected in systems. Watersheds, migratory corridors, soundscapes, viewsheds, riparian zones, etc. should be protected as systems. Although many people think the public lands in the UFO are just rocks and bushes, they are rich with life, and in places easily damaged and slow to heal.
797	My name is Ali Lightfoot and I live on the edge of the BLM in Paonia at 65 Cedar Drive. The BLM is basically our backyard. For the most part I think the land is perfect and how it's managed is fine.
2346	Have you ever seen an Otter close up? They are adorable!! No one with a heart could resist them. Or a multitude of other creatures, just trying to live in a world run by people, most of whom think of making money firsthand the health and well being of people, animals and the rest of the Earth SECOND. Don't be callous and selfish. Be humane and caring. Don't pollute and destroy
1817	Same as it looks today and has looked for many years. If you make modifications to a landscape physically it is no longer what it was.
2367	As a photographer and environmentalist whose family has vacationed in Colorado, this issue matters to us personally. Do the right thing and preserve this unique area for our children and grandchildren to enjoy!
1139	Special attention should be given to the development of the current environmental baseline (as opposed to the No Action alternative). Current environmental conditions need to be described in the document as a baseline so that future changes to environmental resources can be measured for all alternatives, including the No Action alternative.
2366	We have been coming here since I was a child. It is important to me and all Coloradans that we protect this beautiful area
2347	I Love Wildlife
2361	We humans can not just go on over producing and ravaging the planet of its life, or it won't last
1754	I oppose the Uncompahgre Resource Management Plan. Do not change the Uncompaghre management policy.
2363	You may think that a person from Georgia has no knowledge or understanding of things in Colorado. I am a retired EPA program manager and have made frequent trips to Colorado on business and pleasure and care a great deal about environmental issues there. Please place resource protection at the top of your concerns
1138	The EIS should summarize the criteria and process that were used to develop the range of alternatives, including any environmental criteria used to identify and/or screen potential sites involved in the proposed alternatives. The EIS should carefully consider the screening criteria used to eliminate alternatives and also disclose the reasoning used to eliminate alternatives.
651	I would encourage the BLM to consider the average citizen when making land management decisions. Many people who use public lands are not aware of Travel Management Plans or any other changes in how land is managed. The typical citizen might only use public lands a few times a year and doesn't have the resources or knowledge on how to get involved in these types of decisions. It would seem the well organized and well funded conservationist/environmentalist groups are the most vocal and are always pressuring the BLM and Forest Service to further restrict the public from public lands, while the public is unaware of these changes until

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	it is too late and the land is already locked up. Every single year there is yet another Wilderness proposal before congress, this year alone there are at least 3 major pushes for more Wilderness in Colorado alone.
2652	Our environment needs all the help it can get. Whether the air, the water or the land. From climate change to ever growing pollution to logging, to destruction of habitat or species, there are so many threats to our country's environment.

Table C-5
Issue 1: Air Quality, Water, and Soil

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	Air Quality
2797	Dust abatement is a growing concern on BLM lands. With the explosion of surface-disturbing activities on BLM lands in Colorado} we are increasingly concerned about indirect effects} including dust deposition. Dust may harm rare species and/or their pollinators, or facilitate the establishment of non-natives. The RMP should thoroughly address dust abatement requirements, and BLM should actively monitor dust deposition associated with surface disturbance as well as the effects on imperiled species, pollinators, and noxious weed proliferation.
669	As a former non-attaill1lent area for National Ambient Air Quality Standards (NAAQS) for Pm 10, air quality is of particular concern to us. Local governments have expended hundreds of thousands of dollars implementing measures to reduce air pollution, which we have been successful in accomplishing. However, activities on BLM lands, such as grazing, oil and gas development, and OHV use have the potential to undermine these gains. In addition, EPA is promulgating a new NAAQS for Ozone. Depending on where the standard is set, areas within the planning region may already exceed the new standard. We therefore believe it is BLM's responsibility to analyze and disclose the potential environmental and economic impacts of management decisions. For example, if BLM is making lands available for leasing for oil and gas development, it needs to consider and disclose the reasonably foreseeable consequences of its development. San Miguel County is already adversely impacted by activity on BLM lands outside our boundaries with regard to ozone and particulate pollution. Recent dust events exacerbated by disturbed soils on public lands have had profound impacts on the timing and duration of the snowmelt in the county. This adversely impacts our skiing dependent tourist economy, our agricultural and municipal water users, and the timing of natural ecosystem processes.
1124	Based on the general information available for review, our initial areas of concern for this upcoming resource management plan include impacts to air quality from energy development, impacts to wetlands, and protection of water resources. We are also concerned with the potential cumulative effects of the increased energy development in the region. Along with identifying direct impacts, the EIS should include a rigorous analysis of indirect and cumulative impacts. The EIS should disclose the impacts of all reasonably foreseeable actions on environmental resources in a way for decision-makers and any participating counties/municipalities to be able to effectively plan to reduce impacts on such resources as much as possible.
1128	EPA is particularly concerned with air quality impacts associated with emissions from the potential increase in energy development in the planning area, as well as the cumulative impacts that may be occurring as a result of increased energy development in the surrounding western slope area of the state. Planning-level NEPA analyses, such as RMPs, provide direction for broad resource management and 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 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, including the following: whether additional leasing (and the likely development associated with such leasing) can proceed without impacting the National Ambient Air Quality Standards (NAAQS), Prevention of Significant Deterioration (PSD) increments, and Air Quality Related Values (AQRVs), 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.
1129	In RMPs that plan for significant oil and gas development, EPA maintains that air quality modeling should be conducted to assess the direct and cumulative impacts of projected energy development on air quality 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 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 the NAAQS or potential adverse impacts on PSD increments or AQRVs (e.g., visibility) in nearby Class I areas.
1130	In reviewing planning-level NEPA documents, EPA typically considers the following factors in determining the appropriate level of air quality analysis. These factors, although not exclusive and 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. • Number of projected oil and gas wells based on estimated energy resources and reasonable well density.

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	• Distance of the planning area or projected well development areas from Class I airsheds. • Distance from other sensitive receptors (e.g., National Parks, Class II areas, and population centers). • Distance from areas approaching an exceedance of a NAAQS. This is particularly important in the West for ozone and fine particulate matter (PM2s). • Availability of recent, relevant, and comprehensive air quality modeling data prior to preparation of a management planning draft EIS. • Whether a relevant, comprehensive, and cumulative air quality analysis is concurrently completed with a project-specific EIS in the management planning area. • Potential for cumulative adverse impacts to air quality from projects in adjacent planning areas.
1131	While energy development appears to be a key issue to be addressed by the RMP, no estimate of the reasonably foreseeable development (RFD) is included. Until the RFD for the RMP is estimated, 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 regarding the air quality analysis planned for this RMPIEIS.
1143	The current air quality conditions in the area covered by the RMP should be presented. The amount of stationary, mobile and non-road source emission activities should be quantified and disclosed. Then, air quality impacts should be identified for activities addressed under the RMP, including energy development, wildland fire management, and road dust. Particulate emissions from related construction activities should be addressed. Any significant concentrations of hazardous air pollutants (HAPs) should be evaluated, including those that may be emitted during the drilling, completion and production of the oil and gas wells (e .g., formaldehyde, benzene, toluene, ethyl benzene, xylene, n-hexane, and formaldehyde). This analysis should address and disclose the potential affect on National Ambient Air Quality Standards (NAAQS) and Prevention of Significant Deterioration (PSD) increments across the planning area. Specific pollutants of concern include nitrogen oxides (NOx), sulfur dioxide (S02), and fine particulate contributions to regional haze, as well as PMIO related to road dust emissions. In addition, disclosure should be made of potential impacts to air quality-related values (AQRVs) at any affected Class I Federal areas designated under the Clean Air Act (CAA), including Black Canyon of the Gunnison National Park and Wilderness Area, West Elk Wilderness Area, and Maroon Bells-Snowmass Wilderness Area.
1144	Since the State of Colorado is in the process of completing work on its Regional Haze State Implementation Plan (SIP), BLM should ensure that activities addressed under the RMP will not interfere with any requirements of the Regional Haze SIP.
1145	Finally, the RMP may include areas that have a CAA maintenance plan for particulate matter (e.g., Telluride). Under the General Conformity Rule, federal agencies must work with State governments in non attainment or maintenance areas to ensure that a federal action conforms to any relevant SIP.
1146	While EPA understands broad assumptions are made at the RMP stage, the air quality analysis should include reasonable estimates of full development, including wells, compressors, drilling rigs and other surface facilities, as well as associated transportation activities. For most planning-level air quality analyses, estimates of the total number of sources can be made based on geological estimates of the recoverable oil and gas resources. Approximate locations of emission sources may be projected and sited into specific zones of the planning area based on USGS probability maps. Such estimates should be adequate to evaluate potential visibility and AQRV impacts on Class land Class II areas and the potential impacts to air quality standards, including regional ozone and particulate matter. Site specific impacts can be analyzed when specific development plans are identified in a more detailed, subsequent, project-specific EIS.
1147	EPA recommends that BLM fund an inter-agency air quality workgroup for this RMP to specifically discuss the planned approach to the air quality analysis, the results of the analysis, and appropriate mitigation measures. An air quality workgroup might include members from EPA, the State, and any other Federal or Tribal agency with management responsibilities in the area. One of the primary purposes of an air quality workgroup would be to provide feedback to BLM at the earliest stages of EIS development. EPA believes stakeholder involvement is important at all stages of the air quality analysis including the emission inventory, the modeling protocol, analysis of results, and if necessary, identification of appropriate mitigation.
1148	In preparing the EIS, we recommend BLM's approach to analyze and predict air quality impacts should be documented in an Air Quality Modeling Protocol and fully vetted with the air quality workgroup. An Air Quality Modeling Protocol provides a "roadmap" for how the air analysis will be conducted and the results presented. It describes the model that will be used for analysis, including model settings, modeling boundaries, and important

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Comment ID	Comment
	model inputs such as meteorology, background data, and emissions inventories. The Protocol also should generally describe the standards to which the air impact results will be compared. EPA recommends that a Draft Air Quality Modeling Protocol be circulated among the air quality workgroup for comment and discussion. As part of this discussion, we recommend workgroup members discuss and reach agreement on the emissions inventories that will be used and the alternatives that will be modeled. If significant disagreements persist, EPA recommends those issues be elevated within the respective agencies for resolution. By discussing the model, emissions inventories, and alternatives up front, BLM may avoid additional costly and time-consuming air quality modeling analysis revisions at a later date.
1149	EPA would like to meet with BLM to discuss the air quality impact analysis planned for this RMP/EIS. By proactively working together early in the RMPIEIS process, we hope to assist BLM with the development of an air quality analysis which will adequately address potential air quality impacts and identify appropriate mitigation measures.
1150	The level of air quality analysis may range from a qualitative emission inventory approach to an air quality dispersion model to a full robust photochemical grid model analysis. Until the reasonably foreseeable development for the Uncompahgre Field Office RMP is calculated, it is difficult to definitely identify the appropriate level of air quality analysis. Qualitative Emissions Inventory Approach: A qualitative emissions inventory approach may be appropriate in some cases to complete the NEPA analysis. For this approach, projected emissions of key pollutants are estimated for each of the alternatives analyzed in the NEPA document. While the emissions inventory approach provides a means of relative comparison between alternatives, it does not provide an estimate of the potential impacts to the NAAQS or AQRVs. This method falls short of predicting the likely air quality impacts associated with these emissions, especially if there is an increasing inventory. Usually, the most appropriate use of the emissions inventory approach is to demonstrate that emission changes will be negligible as a result of the federal action contemplated within the NEPA document. For NEPA documents that use this approach, we typically recommend the following: • The emissions inventory should include all criteria pollutants and key hazardous air pollutants, including benzene, formaldehyde, toluene, ethylbenzene, exylenes, n-hexane, and methanol. • The emissions inventory should include quantifiable pollutant emissions from all activities or sources, including pad construction, drilling, well completion, hydraulic fracturing, production, wellhead abandonment, mobile sources, fugitive volatile organic compounds, and fugitive particulate matter. • The mobile sources category should include all traffic anticipated during the lifetime of the project, including support vehicles, condensate trucks, and diesel fuel tanker traffic. • Estimates of emissions are performed using commonly accepted methodologies and assumptions. Methods typically used include actual stack sampling, continuous emission monitoring, AP-42 emissions factors (see http://www.epa.gov/ttn/chief/ap42), calculation programs such as TANKS (see http://www.epa.goy/ttn/chief/software/tanks), and engineering calculations. • Detailed emissions inventory calculations and assumptions (e.g., drilling time, completions, etc.) should be transparent and provided as an appendix.
1151	Air Quality Modeling Approaches: To ensure that an adequate level of consistency is met for the various air quality analyses conducted nationally, EPA promulgated a Guideline on Air Quality Models ("Guideline"). See 40 CFR 51, Appendix W. The Guideline recommends air quality modeling techniques that should be applied to SIP revisions for existing sources and to new source reviews, including PSD. Applicable only to criteria air pollutants, it is intended for use by EPA Regional Offices in judging the adequacy of modeling analyses performed by EPA, State, and local agencies and by industry. The Guideline is appropriate for use by other Federal agencies and by State agencies with air quality and land management responsibilities. See 40 CFR 51, Appendix W, Section 1 (a). The modeling techniques described in the Guideline are peer reviewed and used commonly to ensure consistency throughout the nation. It is generally understood that regulatory requirements and model technology undergo routine changes which necessitate that the Guideline periodically be reviewed and updated. Accordingly, EPA recommends that modeling techniques described in the Guideline be used whenever determining pollutant impacts for NEPA-related projects.
1152	For NEPA purposes, air quality impacts are typically determined from project specific impacts coupled with reasonable foreseeable development (RFD) sources then added to a "background" source of data (usually actual monitored data) to obtain the total impacts to the modeling domain. While this method results in accurate project specific impacts, the cumulative results are very dependent on the background data used. Whenever

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	possible, EPA recommends the following: • Background data should be collected from actual monitoring locations near the modeling domain boundary. Monitored data should represent current background pollutant concentrations and not data impacted from localized sources. • Modeled background data should be used only when no monitored data is found.
1153	Near-Field Air Quality Modeling: Industrial Source Complex (ISCST3) was the air dispersion model used nationally for near-field air quality impacts for over 20 years. The discussion in the Guideline, Section 4.1 (d), describes advances made to air dispersion modeling since ISCST3 was developed. To better characterize plume behavior, the American Meteorological Society/EPA Regulatory Model Improvement Committee developed its AERMOD model. The AERMOD air dispersion model has the capability to better account for interaction near the earth's surface, which can include complex terrain in the near field and local scale meteorology factors. Accordingly, AERMOD is EPA's preferred method to determine criteria pollutant impacts up to 50 lan downwind and is referenced in the Guideline. EPA recommends that AERMOD should generally be used for determinations of criteria pollutant impacts (AERMOD is not applicable for determining ozone concentrations; since it does not contain a photochemical algorithm), hazardous air pollutants, and PSD increments in Class I and II areas. EPA also recommends that meteorological data used in the analysis should be a collection of at least one year's data from an onsite measurement station or three to five years of data from a nearby National Weather Service station or from another nearby meteorological monitoring station conforming to the Meteorological Monitoring Guidance for Regulatory Modeling Applications, February 2000, EPA-454/R-99-005 (http://www.epa.gov.scram001/guidance/metlmmgrma.pdf).
1154	Far-Field Air Quality Modeling: Neither the ISCST3 nor the AERMOD models are capable of determining chemical transformations or particle deposition. It is generally necessary to account for chemical transformations to accurately determine regional haze, visibility, and deposition of aerosol impacts from emissions of NOx, SOx, and volatile organic compounds (VOCs). Further, the near field models do not account for distant pollutant transport longer than 50 km. The Guideline references CALPUFF as the preferred model method to predict pollutant impacts from long-range (more than 200 km) transport from a large number of sources. The CALPUFF model includes chemical transformation and deposition algorithms that enable predictions of visibility and deposition impacts, in addition to criteria pollutants. CALPUFF is not applicable for determining ozone concentrations because the model lacks a photochemical algorithm. For NEPA analyses, EPA believes it is appropriate to use the CALPUFF model to characterize visibility impacts for a group of sources. Meteorological grid spacing should be set to maximize the accuracy of the predicted impacts near the project center. Consideration should be made to the terrain surrounding the project area. More complex terrain may require the higher resolution, such as 4 km grid spacing areas as has been the practice in many of the recent CALPUFF Regional Haze BART modeling applications in the western U.S. It is common to "nest" grid spacing to obtain accurate impact results and minimize computing run times. A typical nesting arrangement may consist of a 36,12 and 4 km horizontal gridded resolution. When using the CALPUFF model, EPA recommends that monthly ozone monitored data for nitrate conversion calculations should be used from sites located near the modeling domain boundary. EPA also recommends that monthly ammonia (NH3) monitored data for nitrate conversion calculations should be used from sites located near the modeling domain boundary. If no data are available, 1.0 ppb should be used for NH3 as the default value for the western U.S. A significant level of computing requirements may be needed for CALPUFF, including three-dimensional wind profiling that considerably increases the amount of data preparation, analysis time and computer support necessary. However, in some cases, previously processed wind/meteorology data may be applicable and available for use in the new analysis. Screening models are also available and may be used in appropriate circumstances. A screening version of CALPUFF, known as CALPUFF-Lite, has been successfully utilized to determine visibility and depositions impacts from smaller numbers of sources. To calculate visibility impacts from a very small number of sources in a limited domain area, another screening model, VISCREEN, may be used in lieu of CALPUFF. VISCREEN requires far less data preparation and computer analysis time than the CALPUFF model; however, it is limited in predicted impacts to a range of 50 km. If CALPUFF-Lite or VISCREEN predict air quality impacts, then more refined ' modeling and/or mitigation measures may be recommended.
1155	Photochemical Grid Modeling: CMAQ and CAMx were designed to have multi-scale capabilities so that separate models were not needed for urban and regional scale air quality modeling. EPA recommends photochemical grid modeling for larger project areas where ozone is of concern and in some applications for AQRVs and visibility. EPA notes that until the reasonable foreseeable development for the Uncompahgre Field

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	Office RMP area is calculated, it is difficult to definitely identify the appropriate level of air quality analysis and whether this approach should include a photochemical grid model.
1156	Since screening-level ozone models are not available, a new modeling analysis for the proposed project would likely be resource intensive. Time and resources could be minimized by tiering off the analysis from a recent ozone study in a nearby area, or including the proposed project in a regional-scale ozone planning study such as those conducted for SIP purposes. Where such analyses are not available, estimates of the proposed project's emissions of ozone precursors should be made and compared to existing local and regional emissions inventories of these pollutants.
1157	The EIS should disclose the direct, indirect and cumulative impacts of a proposed action to air quality. EPA recommends that predicted impacts from the direct, indirect, and cumulative sources on the surrounding areas be compared against the NAAQS, PSD increments, AQRVs, and HAPs Relative Exposure Limits and chronic inhalation exposure guidelines. Comparisons of modeled impacts to the State air quality standards should also be considered.
1158	The Clean Air Act requires special protection of visibility in the nation's large National Parks and Wilderness Areas (identified as mandatory Class I federal areas) and establishes a national goal for "the prevention of any future, and the remedying of any existing, impairment of visibility in mandatory Class I federal areas which impairment results from man-made air pollution." EPA's implementing regulations require states to submit implementation plans that contain such measures as are necessary to make reasonable progress toward the national goal, including improvement in visibility on the worst days and prevention of visibility degradation on the best days. See 40 CFR 51.300-309. Actions by Federal Land Managers (FLMs) that lack adequate mitigation of potential visibility impacts could interfere with a state's reasonable progress goals and impede ability to meet Clean Air Act requirements. In addition to its visibility provisions, the Clean Air Act contains general provisions for a PSD program designed to protect Class I areas from air quality degradation. The PSD program places an affirmative responsibility on FLMs to protect air quality from human-caused pollution in Class I federal areas. The Wilderness Act further directs the FLMs to protect the wilderness character of those areas designated as wilderness. Congress recognized the importance of preserving designated areas in their natural condition and declared a policy to "secure for the American people of present and future generations the benefits of an enduring resource wilderness." For this RMP's air quality analysis to adequately consider impacts to visibility in Class I areas or other sensitive airsheds, EPA recommends the following: • The analysis should be performed using CALPUFF, at a minimum, with appropriate regulatory methodology using visibility Methods 2 and 6. The recently proposed Method 8 also may be considered. • The air quality analysis should include predicted impacts at both 0.5 deciview and 1.0 deciview. A 0.5 deciview change in visibility is considered the level at which a proposed action contributes to visibility impairment. A 1.0 deciview change in visibility is the level at which a proposed action causes visibility impairment. • Screening-level models such as CALPUFF-Lite or VISCREEN may be used for visibility and deposition analysis for projects where more extensive air quality modeling is not required (e.g., an exploratory well near a Class I area). However, if impacts are shown using these types of screening models, more refined modeling and mitigation may be required to fully disclose the impacts of the proposed action. These methodologies and impacts should be summarized in the main body of the EIS.
1159	If this RMP's air quality analysis discloses significant, adverse impacts to air quality, then the EIS should include specific and detailed mitigation measures to address the impacts. The EIS should also include modeled demonstrations that the mitigation measures will be effective. A significant, adverse impact to air quality may include predicted violations of a NAAQS and/or predicted adverse impacts on AQRVs (i.e., visibility impacts to a Class I area). For air quality analyses that predict impacts that approach a NAAQS, it may be prudent to consider and implement appropriate mitigation. Air quality mitigation measures may include, but are not limited to: • Tier II or better drilling rig engines (e.g., natural gas drilling rigs); • Electric drilling rigs; • Selective catalytic reduction or other secondary emission controls on drilling rig engines; • Fuel additives; • Electric or natural gas-fired compression;

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	• Reduced pace of development; • Phased development; • Low or no flow pneumatic valves or solar-electric pumps; • Centralization of gathering facilities; • Emission offsets; • Green completions; and • Additional EPA Gas Star program measures.
1160	EPA recommends the EIS include an analysis and disclosure of greenhouse gas emissions and climate change. While methane represents only 8 percent of the U. S. greenhouse gas emissions, it is 23 times more effective as a greenhouse gas than carbon dioxide (C02). Oil and natural gas systems are the biggest contributor to methane emissions in the U.S. , accounting for 26 percent of the total (EPA' s Natural Gas Star Program and the U.S. Emissions Inventory 2007: Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2005). For the Draft EIS, EPA suggests a three step approach: 1. Consider the future needs and capacity of the proposed action to adapt to projected climate change effects. 2. Characterize and quantify the expected annual cumulative emissions that would occur as a result of the resource management plan's implementation, and use C02-equivalent as a metric for comparing the different types of greenhouse gases emitted. 3. Briefly discuss the link between GHGs and climate change, and the potential impacts of climate change. 4. Discuss potential means to mitigate plan-related emissions. One voluntary mitigation effort targeted at the oil and gas industry is EPA's GasST AR program. Through the program, EPA technical experts help identify and promote the implementation of cost-effective technologies and practices to reduce greenhouse gas emissions.
1161	Dust particulates from construction, vehicle travel on unpaved roads, and ongoing operations are an important concern. Airborne dust may not be only a visual nuisance, but can potentially be dangerous to asthma sufferers. Sedimentation from storm water run-off can also severely impact the aquatic environment. The EIS should include plans for addressing dust control. At a minimum, the plans should include dust suppression methods, inspection schedules, and documentation and accountability processes.
2163	Air quality in Colorado continues to be a challenge. New policy guidelines and practices implemented by the EPA should be included in the RMP revision. This is particularly important as it applies to emission sources in oil and gas fields. Particulate deposition impacts not only air quality but water and land resources as well. These in turn, affect the status of: wildlife, fish and human heath
2164	Mitigation options for any potential development plans should include requirements for substantive air quality modeling and visibility plans, implementation parameters and monitoring processes.
2835	Fugitive Dust Oil and gas development, mining, grazing, and off-road vehicle use are activities managed by the BLM that can destabilize soils and make them susceptible to windborne erosion. The resulting dust can cause impacts to wildlife, air quality, climate, and human health. The Monticello and Richfield (Utah) Proposed RMPs declare that surface disturbing activities such as oil and gas development and motorized vehicles contribute to fugitive dust (see, e.g. Richfield PRMP at 4-6, Monticello PRMP at 4-17,3-13). The Uncompahgre RMP should also recognize this impact, analyze it in each of the alternatives, and adopt management actions that minimize pollution from fugitive dust emissions. a. Impacts to Ecosystems Fugitive dust suspended in the air has the potential to impact more total area than any other impact of roads (paved or unpaved), and it can have significant effects on ecosystems and wildlife habitat. Forman et 01.,2003; Westec, 1979. Motorized vehicles create fugitive dust by travelling on unpaved roads and through cross country travel; it is then dispersed along roadsides or carried further afield via wind currents. An example of fugitive dust plumes caused by ORV traffic is documented in 1973 satellite photos. These photos show six dust plumes in the Mojave Desert covering more than 1,700 km2 (656.2 mi2). These plumes were attributed to destabilization of soil surfaces resulting from ORV activities. Nakata et al., 1976; Gill 1996. Fugitive dust can have serious consequences for plant and animal species. One study of Alaskan roads heavily traveled by various types of vehicles found that dust had buried mosses and very low-statured vegetation in the 10-m-wide area adjacent to each side of the road; dust blankets measured up to 10 cm (3.9 in) deep. Walker and Everett 1987. According to the EPA, Dust can cause both physical and chemical effects. Deposition of inert PM [Le., particulate matter] on above-ground plant organs sufficient to coat them with a layer of dust may result in changes in radiation received, a rise in leaf temperature, and the blockage of stomata. Crust formation can reduce photosynthesis and the formation of carbohydrates needed for normal growth, induce premature leaf-fall, damage leaf tissues, inhibit growth of new tissue, and reduce starch storage. Dust may decrease photosynthesis, respiration, and transpiration; and it may

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	result in the condensation and reactivity of gaseous pollutants with PM, thereby causing visible injury symptoms and decreased productivity. EPA, Draft Integrated Science Assessment for Particulate Matter, at 9-108 to 9-109 (Dec. 2008), available at http://oaspub.epa.gov/eims/eimscomm.getfile?p download id=485679. The BLM should address the impact of fugitive dust on vegetation in and near the Uncompahgre Field Office, including the disruption of photosynthetic and respiration processes and resulting reduced plant growth, reproduction, and survivorship. It should also evaluate the impacts of dust on wildlife. b. Climate Change A hard look at impacts from fugitive dust is also necessary in order to understand and disclose to the public the likely contributions to regional climate change caused by this plan. In September 2009, Dr. Jayne Belnap of the United States Geological Survey gave a presentation to the Colorado Water Conservancy District.25 Dr. Belnap's presentation addressed the connection between increased temperature, disturbance, invasive species and dust. This presentation focused much attention on the impacts from ORVs and noted the cycle of increasing temperatures, which increases dust, which is exacerbated by ORV use, which increases the effects of climate change (temperature increases), with the key indicator of these problems being earlier snowmelts. Of particular concern is the amount of dust that results from motorized routes, which settles upon snow pack and alters the melt rate which, in turn, alters the availability of warm season infusion of water into streams and lakes, when such water is critical to wildlife. For example, in 2005 and 2006, disturbed desert dust melted snow cover 18 to 35 days earlier in the San Juan Mountains.26 In 2009, disturbed desert dust melted snow cover 48 days earlier in the San Juans. 27 Neff, et.al, (2008) found that "dust deposition onto snow cover in the western United States has recently been shown to accelerate melt and reduce snow-cover duration by approximately one month, a finding that has broad implications for water resources in mountainous regions of the United States" (citing Painter, T. H. et 01. The impact of disturbed desert soils on duration of mountain snow cover. Geophys. Res. Lett. 24 (2007), attached). c. Air Quality Fugitive dust is also a significant contributor to air quality impairment. In fact, according to the National Emissions Inventory, road dust is the single greatest source of PMIO• EPA, Draft Integrated Science Assessment for Particulate Matter, at 3-171 (Dec. 2008), available at http:Uoaspub.epa.gov/eims/eimscomm.getfile?p download id=485679. Fugitive dust accounts for approximately 50% of primary PM2.5, with 40% of that arising from unpaved roads. EPA, Air Quality Criteria for Particulate Matter, at 3-94 (Oct. 2004), available at http:Uoaspub.epa.gov/eims/eimscomm.getfile?p download id=435945. Further, a recent California study clearly demonstrates that ORV activity is a major contributor to high particulate matter concentrations in nearby airsheds because of destruction of soil crusts and vegetation. Craig, Cahill, and Ono 2010, available at http:Uwww.slocieanair.org/pdf/PM2-final report.pdf. The RMP should discuss impacts the travel system and ORV use can have on air quality in the resource area and airsheds outside the resource area. d. Human Health In addition to the concerns raised above, we are worried that increased levels of particulate matter will have negative effects on human health inside and outside the resource area. According to the EPA, "[n]umerous scientific studies have linked particle pollution exposure to a variety of problems, including increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing, for example; decreased lung function; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease." http://www.epa.gov/pm/heatth.htmt, last accessed March 9, 2010. In fact, recently a group of doctors in Utah cited increased dust due to climate change, which, as noted above, is exacerbated as a result of ORV use on fragile soils, as a top public health concern in the arid West. (See attached article.) The BLM should analyze the effects of fugitive dust on human health in the resource area, including the potential for airborne fugitive dust to travel and affect human health beyond the boundaries of the Uncompahgre Field Office. Recommendations: BLM should analyze the amount of dust that will be generated from the road system, including for ORV use and energy development, through the use of readily available modeling techniques and sampling for particulate matter generated along a representative sample of routes proposed for designation. This has been done for BLM projects (the West Tavaputs Plateau Natural Gas Full Field Development Plan, DEIS February 2008 and the Enduring Resources' Saddletree Draw Leasing and Rock House Development Proposal, FEA December 2007), and the models for these projects demonstrate that fugitive dust from vehicular travel on unpaved roads can create significant levels of ambient pollution. The Uncompahgre RMP should complete a similar analysis, which comprehensively inventories and describes fugitive dust emissions and models near-field, far-field, and cumulative effects of fugitive dust. The RMP should limit surface disturbing activities as necessary to reduce windborne soil erosion. 25 PowerPoint presentation given September 18, 2009 at the Colorado River Water Conservancy District seminar, attached as Appendix C and available online at http://www.crwcd.org/page 305). 26 Thomas H. Painter et al., Impact of Disturbed Desert Solis on Duration of Mountain Snow Cover, Geophysical Research letters.. Vol. 24, 112502 (June 23, 2007). 27 Thomas H. Painter, Presentation, Colorado River District Water Seminar, September 18, 2009, Grand Junction, Colorado (Painter Grand Junction

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	Presentation).
2833	The RMP must thoroughly analyze impacts of each alternative on air quality, especially in the context of oil and gas development. The Environmental Protection Agency is currently proposing to lower the National Ambient Air Quality Standard (NAAQS) to better protect human health. The EPA's proposal would strengthen the 8-hour "primary" ozone standard to a level within the range of 0.060-0.070 parts per million (ppm). EPA is also proposing to establish a seasonal "secondary" standard, designed to protect sensitive vegetation and ecosystems, including forest and wilderness areas, set within the range of 7-15 ppm-hours. Although non-attainment is most frequently expected and witnessed in large urban areas, rural counties with high levels of oil and gas development have experienced startlingly high levels of ozone pollution. The RMP should analyze air quality in the context of the new NAAQS, which should be finalized before the draft RMP is released. In addition to ozone pollution, oil and gas development activities contribute to CO, NOx" SOz, HAPs and volatile organic compound (VOCs) pollution, through activities like flaring, drilling, processing plants, and wellhead compressors and compressor stations, to name a few. Additionally, recreational ORV use cause fugitive dust emissions, particulate matter and contribute CO, NOx" and hydrocarbon emissions. Furthermore, deterioration of air quality is shown to have substantial economic costs, and good air quality provides many economic benefits. Attached please find a fact sheet (incorporated into these comments by reference), prepared by The Wilderness Society, entitled, "Assessing Costs Associated with Impacts to Air Quality." The Wilderness Society reviewed three studies: two Reports to Congress prepared by the EPA and one recent peer-reviewed article whose principal author is a researcher employed by the EPA. 21 These three studies summarize nearly all of the extant epidemiological and economic research related to the health consequences of ozone exposure and the economic values of reducing such exposure.22 The studies, released in 1997, 1999, and 2005, show five patterns clearly: 1. Improvements in air quality result in substantial economic benefits well in excess of economic costs. 2. The range of known and scientifically-valid health consequences from polluted air in general, and elevated ozone levels in particular, is increasing. 3. The increasing breadth and depth of valuation research in economics provides evidence that can be used to quantify and monetize the health-related benefits of reduced air pollution. 4. High levels of inflation for goods and services related to health care suggest that the economic costs of ozone exposure will grow rapidly in the future, even if NAAQS standards are not further tightened. 5. There is a well-stocked tool box available to BLM to use in estimating the economic cost of the increased air pollution likely to result from accelerated oil and gas development and other pollution-generating activities on BLM lands. In making land use decisions, federal agencies have an obligation under NEPA to take a "hard look" at the environmental consequences of a proposed action, and the requisite analysis "must be appropriate to the action in question." 42 U.S.C. § 4321 et seq.; Meteallv. Daley, 214 F.3d 1135, 1151 (9th Cir. 2000); Robertson v. Methow Valley Citizens Council, supra. The impacts and effects of a proposed action, such as oil and gas development, that federal agencies are required to assess include: "ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative." 40 C.F.R. § 1508.8. Under the Data Quality Act, federal agencies are required to use information that is of high quality and that is objective, useful, and verifiable by others.23 Agencies must also use "sound statistical and research" methods.24 In order to complete a sufficient analysis of air quality, the data provided with this fact sheet should be incorporated into the BLM's air quality analysis. Protecting air quality should be a priority in the Uncompahgre RMP. FLPMA requires BLM to consider the relative value of the various resources, and clean air is quickly becoming (along with undeveloped landscapes) a most valued, yet dwindling resource. Therefore, BLM should take a proactive approach to managing air quality by, among other things: setting aggressive standards (beyond that simply found in existing regulations); requiring any actions on public lands to meet those standards (i.e. no flaring, no two-stroke engine use on public lands, etc); analyzing the cumulative impact of any proposed action with other past, present, and reasonably foreseeable actions; establishing an effective monitoring program; and halting any actions that contribute to air pollution if such monitoring reveals that standards have been exceeded. Furthermore, NEPA requires BLM to analyze both adverse and beneficial impacts of its decisions. Therefore, the RMP should assess not only negative impacts to air quality from activities such as oil and gas development, but also the potential benefits of controlling those effects. Recommendations: BLM should analyze impacts to air quality using the EPA's proposed NAAQS, and include management actions and best management practices in the RMP that minimize and mitigate those impacts. BLM should consider economic and other benefits of protecting air quality. 21 This review was originally conducted by Dr. Joe Kerkvliet as part of his comments on the Final Supplemental Environmental Impact Statement for the Pinedale Anticline all and Gas Exploration and Development Project. 22 The Hubbell, et al., paper is attached to these comments. The EPA reports are too voluminous to attach to this letter, but can be accessed at

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	http:Uyosemite.epa.gov!EE!epa!eerm.nsf/vwRepNumLookuP/EE-0295?OpenDocument and http://www.epa.gov!oar!sect812/19902010/fullrept.pdf. Last accessed Mar. 26, 2010. 23 Treasury and General Government Appropriations Act for Fiscal Year 2001, Pub.L.No. 106-554, § 515. See 0150, Office of Management and Budget "Information Quality Guidelines," available at http://www.whitehouse.gov/omb/inforeg/igg_oct2002.pdf and individual "Agency Information Quality Guidelines," available at http:/www.whltehouse.gov/omb/inforeg/agencYJnfo_qualitYJinks.html. 24 Ibid.
	Water Resources
76	I find that your issue statements miss a major issue. Salinity and selenium control in the Uncompahgre drainage is a major issue, and BLM lands are major contributors. None of the issues stated directly address water quality.
77	The Colorado River Basin Salinity Control Forum is composed of members appointed by the Colorado River Basin States governors. I serve as the Executive Director of that organization. Our organization does not fit into being easily involved in the grass roots open house type of opportunity for exchanges. We often work through state directors or BLM staff in Washington D.C. BLM has been given a charge by Congress to address the salinity issue. There is a full time BLM Salinity Coordinator by the name of Heidi Hadley. Her phone and email are as follows: (801) 524-3886 Heidi_Hadley@BLM.gov I have written to her asking her help in getting this issue into the study effort. You may want to contact her.
112	Any reserve Federal appropriative water rights for drainages along the south flank of the Grand Mesa, should clearly be identified in the RMP. This information would be useful so that future coal operations within those drainage basins could recognize and address those I rights. Then mine plans can be developed to ensure that any reserved water rights are managed appropriately.
143	We are addressing the planed gas drilling on Oak Mesa. Wildwood Ranch is located in Unit 1, and lies at the base of Oak Mesa's southeastern slope. Our concerns are that toxic chemicals could get into our water sources-- reservoirs, wells, springs, and irrigation systems.
144	The North Fork Valley is noted for its many organic growers and contaminated water sources coud put them and us out of business.
243	Water quality- As a minimum, current water quality should be maintained and, where feasible, it should be improved. Reclamation, other Interior agencies and the Department of Agriculture are currently working to reduce selenium and salinity loads within the Colorado River Basin.
244	Water availability- The RMP should reflect that available water is limited and may not be sufficient for all desired uses; even more so during droughts or as a result of climate change. Recommendations and decisions should recognize water rights, agreements, allocations, and allotments.
376	Farmers and ranchers need water for crops and animals. The ditch water and rights are important to our community.
405	If public lands are going to maintain both animal and plant diversity, management is critically important. We need to be closing roads not making new ones. We need to be protecting water sources, springs, streams and rivers. We need to return to a more natural rhythm in fire control.
495	I also believe it is very detrimental to retain the right and ability to file for new water rights on the Tabeguache parks in Nucla.
525	No dams please. Put that myth to sleep.
687	The Norwood LHA finds all the waters analyzed to meet water quality standards. Some sampling data is presented to support this conclusion. There is no discussion of compliance with the other water quality standards that underlie CDPHE Water Quality Control Division use classifications, for example the microbiological standards for Recreation la waters. Has BLM determined these standards are consistently met on all the stream segments and through what mechanism?
706	I am cognizant of the fact that BLM manages its public lands under the principle of multiple use and sustained use, and must provide a balance between usage, and protection of its resources. It is my observation that BLM is doing a good job in managing livestock grazing, vegetation management for both logging and wildlife habitat, and in watershed protection.
753	We want to keep all our grazing rights, water rights, hunting rights and any other rights we were born with in this great country known as the "Land of the Free."

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834	Concerned about water quality of streams and river, lakes for fishing.
914	My domestic water source is from springs on BLM land, Sec 4, 14S,92W. My concern is that oil& gas drilling (or any other mineral extraction) on the south flank of Grand Mesa might contaminate these springs. Ideally, I would like to see a withdrawal of these lands from mineral leasing and development. If this is not possible, then extraction activities should be located as far as possible, but at the minimum one mile, from these and other domestic water sources.
1047	Water development such as reservoirs, ponds, spring development and wells should be a priority.
1078	This industry uses billions of gallons of water in its production. Where are billions of gallons of water coming from? In a dry year here in the North Fork Valley, some irrigation ditches are shut down in mid-summer because there is not enough water. How can there be enough water to force down wells to fracture the Earth? And then how are billions of gallons of poisoned water going to be disposed of? What are WETHE PEOPLE supposed to drink and water our crops with?
1126	Based on the general information available for review, our initial areas of concern for this upcoming resource management plan include impacts to air quality from energy development, impacts to wetlands, and protection of water resources. We are also concerned with the potential cumulative effects of the increased energy development in the region. Along with identifying direct impacts, the EIS should include a rigorous analysis of indirect and cumulative impacts. The EIS should disclose the impacts of all reasonably foreseeable actions on environmental resources in a way for decision-makers and any participating counties/municipalities to be able to effectively plan to reduce impacts on such resources as much as possible.
1135	For areas with significant energy development, water source protection may be a key issue. The RMPIEIS should analyze the potential impacts to surface water, groundwater, existing and potential drinking water, and irrigation waters. Impacts to consider include water quality, water quantity, and any adverse change to current water quality of any rivers, streams, and their tributaries. Water source protection is particularly important for oil and gas development on split estates (federal mineral/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.
1136	EPA recommends BLM consider whether NSO lease stipulations would be appropriate to protect current or potential drinking water sources. In un-leased areas, terms and conditions (including NSO lease stipulations as appropriate) should be considered to protect non-mineral resources. For leased areas, Best Management Practices (BMPs) and mitigation measures should be used to protect these resources and designed into the alternatives under consideration.
1166	EPA recommends the RMPIEIS include an accurate description of surface and groundwater resources, as both are essential to understanding the potential effects of any management alternative. The RMP/EIS should clearly describe water bodies within the analysis area that may be impacted by resource management activities. Using maps to identifying affected watersheds of the various alternatives helps convey their relationship with project activities.
1167	The RMPIEIS should also disclose the extent to which aquatic habitat could be impaired by potential activities, including effects on surface and subsurface water quality and quantity, aquatic biota, stream structure and channel stability, streambed substrate (including seasonal and spawning habitats), stream bank vegetation, and riparian habitats. Particular attention should be directed at evaluating and disclosing the cumulative effects of increased levels of erosion and sedimentation. Water quality parameters such as conductivity, dissolved and suspended solids, metals, pH, temperature, dissolved oxygen and physical aquatic habitat parameters may also be important monitoring indicators for determining stream or lake impairment or stress, as well as its sensitivity to further impacts. Existing water quality standards applicable to the affected water bodies should be presented to provide a basis for determining whether existing uses will be protected and water quality standards met.
1168	For areas with significant energy development, water source protection may be a key issue. The RMP/EIS should analyze the potential impacts to surface water, groundwater, existing and potential drinking water, and irrigation waters. Impacts to consider include water quality, water quantity, and any adverse change to current water quality of any rivers, streams, and their tributaries. Water source protection is particularly important for oil and gas development on split estates (federal mineral/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

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	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. NSO lease stipulations may be appropriate to protect current or potential drinking water sources. In unleased areas, terms and conditions (including NSO lease stipulations as appropriate) should be considered to protect non-mineral resources. For leased areas, Best Management Practices (BMPs) and mitigation measures should be used to protect these resources and designed into the alternatives under consideration.
1228	In addition to the Wild & Scenic Rivers eligibility there are several areas within the RMP planning process which warrant additional comment. Travel Management, Water Quality and Soils are of concern to the River District.
1230	Ongoing and future land use decisions have the ability to exacerbate natural erosion within the UFO. The River District is a cooperator in the Colorado River Basin Salinity Control Program and the Selenium Task Force. As such, the River District supports ongoing and future salinity and selenium control projects. Land use management decisions (including the disposition of, or transfer of federal land ownership) need to carefully be analyzed to prevent increased erosion, sediment transport and/or deep percolation of water that can mobilize salts and selenium. In addition, land disturbance has been linked to increase in dust storms which can directly and adversely affect the timing and amount of snowmelt runoff
1624	The Dolores Corridor, including the Paradox Valley and its rich wildlife and cultural resources, should be managed in close cooperation with adjacent BLM Field Offices and private land owners. It is important that the river ecosystem be considered as a whole in order to institute management that maintains its unique qualities.
1638	My wife and I love to go rafting, but as you know the Dolores has been mostly a trickle since McPhee was completed. We would like to see water returned to this important ecosystem.
1937	Assessment of management issues on a watershed basis is important to identify and adequately address conservation needs. Rivers and watersheds cross jurisdictional and political boundaries. Riparian areas support the vast majority of biological species during some portion of their lifecycle. And rivers are the lifeblood for local communities' health, recreation, and aesthetic enjoyment. For these reasons, we recommend that the Plan include a separate assessment section to consider the conservation needs of rivers and wetlands on a watershed basis, and to analyze impacts of management decisions on rivers and watersheds as distinct natural systems.
1938	Certain types of land use are known to have significant potential to affect water quality, wetlands and riparian systems. We request that analysis of impacts explicitly consider potential effects on groundwater and riparian systems, particularly for potential energy exploration and development. Energy development that may have particular impacts on water quality and riparian function include hardrock mining, oil and gas extraction, and large-scale geothermal extraction.
1939	In addition, we request that the Plan address the potential impacts of recreational use and grazing on water quality and riparian systems. Analysis of any such impacts should include the potential for the spread of invasive species along waterways.
1940	Long-term and cumulative effects of management decisions will be considered.
1946	Analysis of impacts will consider the potential of certain types of land use to shift ecological systems from those that are unique with high biodiversity and healthy natural function, to systems that are poorly functioning, or with common and generalist species and low biodiversity. Analysis of impacts on riparian systems will consider aspects of integrated natural function, including factors such as geomorphology, invertebrate and vertebrate species, and vegetation; and the role of riparian areas and wetlands to support movement, migration and reproduction for wildlife and birds.
1962	We encourage BLM coordination with other agencies, including the Forest Service (USFS) and Fish and Wildlife Service (FWS), to ensure protection of the extended riparian ecosystem. A guideline for inter-agency coordination is presented in the Unified Federal Policy for a Watershed Approach to Federal Land and Resource Management (UFP). Effective since October 2000, this policy is "intended to provide a framework to enhance watershed management for the protection and the health of ecosystems on Federal lands" (2). The UFP is not a regulation, nor does it establish a regulatory program. However, it does call on inter-agency collaboration to restore and protect water resources within the framework of existing laws and regulations. Because many of the eligible segments originate on USFS lands before flowing through BLM lands, we ask that the two agencies work together to ensure the protection and enhancement of water resources and aquatic ecosystems. Furthermore, the presence of endangered species in many segments should involve the FWS in the

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	decision-making process. This collaboration would facilitate conservation practices that consider the entire riparian ecosystem, not just the individual BLM-administered segments. The RMP revision process is an opportune time for the BLM, USFS and FWS to work together to better protect and enhance the riparian ecosystems and their wildlife.
2052	All permitted mines must: prove that there will be no harm to both surface and ground water quality and quantity; prove that the long-term ecological health of the area will not be jeopardized;
2151	Water: Protecting water quality requires more than the conservation efforts of headwater stream, mainstem conservation efforts. Or development avoidance of riparian zones. Climate change discussion and management implications should be included in the revised RMP. In Colorado, air temperatures have already warmed by -2 degrees F in the past 30 years (Colorado Water Conservation Board. 2008. Colorado climate change: A synthesis to support water resource management and adaptation. Climate Change in Colorado. University of Colorado at Boulder. http://cwch.state.co.IlsIHomeiClimateChange/ClimateChangeInColoradoReport;D. By conserving and using water more efficiently, restoring riparian and stream areas, managing water quality, and providing management guidelines for protecting sensitive trout and aquatic species, we will increase the ability to adapt to climate change fluctuations and dissipations (Williams, J .E.. A.L. Haak, N.G.Giliespie, H.M. Neville, and W.T. Colyer. 2007. Healing troubled waters: preparing trout and salmon habitat for a changing climate. Trout Unlimited, Arlington, Virginia. Available: www.tu.org; Williams, .LE .. A.L. Haak, H.M. Neville, and W.T. Colyer. 2009. Potential consequences of climate change 10 persistence of cutthroat trout populations. North American Journal of Fisheries Management 29:533-548. 2009).
2153	Water impacts due to abiotic threats Should also be discussed in the revised RMP and include updated management restrictions that protect. Colorado' s waters. Water quality degradation, flow reduction impacts. grazing, energy development, and impacts from droughts and/or floods should all be part of the discussion under water issues. As an example of industry' s affect on water quantity, it is estimated by the Environmental Protection Agency (2002) that for every barrel of oil or gas extracted. an average of 7.5 barrels of water is required.
2155	The management for healthy watersheds will directly contribute to other connected resource management successes. Healthy watersheds will be more resistant and resilient to other stressors mentioned above. From TU' s perspective and interest, maintaining strong and vibrant watershed systems typically results in healthy fisheries, thus preventing unnecessary population declines, future endangered species listings, and a strong recreational vale for the angling public.
2157	River systems within the UFO contain populations (including · conservation populations) of the Colorado River cutthroat trout (CRCT). This species has declined in that last century and now occupies less than 14% of its historic habitat and only 8% of the historic habitat range is occupied by unhybridized or ecologically significant populations (CRCT Coordination Team. 2006. Conservation Strategy for Colorado River cutthroat trout (Oncorhynchus clarkii pleuriticus) in the states of Colorado, Utah. and Wyoming. Colorado Division of Wildlife, Ft. Collins. 24 pp.: Young, M.K. 2008. Colorado River cutthroat trout: a technical conservation assessment. General Technical Report RMRS-GTR · 207-WWW. USDA Forest Service, Rocky Mountain Research Station, Ft. Collins, Colorado.). The CRCT Conservation Strategy is very specific in its (illegible) to manage for the conservation of this species. Strategy 7 under Physical Conservation Activities states: Manage entire watersheds: lmpacts outside the riparian zone should be considered as part of CRCT management. Land m01lagement agencies should work to mitigate adverse impacts of watershed activities on water quality, instream habitat, channel morphology, riparian areas, and population stability (CRCT Conservation Strategy, page 18). While No Surface Occupancy (NSO) stipulations within a set distance of a stream occupied by cutthroat trout or a stream suitable for reintroduction are a good sta1t, a "setback" stipulation is limiting in its accountability toward stream integrity. A stream is only as good as the integrity of its watershed, from ridge-top to ridge top. By only protecting streamside (illegible), we fail to acknowledge that upland land uses - along with surface disturbances along tributary streams - can have serious negative impacts to water quality and in turn aquatic biota in larger, trout bearing streams. The Beaverhead-Deerlodge National Forest (BHDLNF) in Montana recognized this reality and recently adopted a watershed management approach in its 2009 Revised Forest Plan Revised (Beaverhead-Deerlodge Revised Land and Resource Management Plan, January, 2009). In doing so, the BHDLNF implemented for all Key Watersheds' with cutthroat trout, an NSO stipulation that covers the entire drainage. For watersheds containing conservation populations of cutthroat trout outside of Key Watersheds. the BHDLNF put in place a CSU stipulation that requires no net sediment increase over existing conditions.

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2159	Agricultural demands and impacts to water remains high and 92% of the water in Colorado is diverted from streams and aquifers and used for agriculture (Thomas S.2007. Water under pressure: Colorado's threatened water resources. Environment Colorado Research and Policy Center, Denver.). By implementing more adaptable and stronger riparian management actions in the RMP revision, livestock grazing impacts to stream habitat would be lessened. Currently it is estimated that livestock grazing is considered a nonpoint source pollution and is known to negatively affect the habitat of 33% of pure CRCT populations(www.fws. gov/mountain-prairie/species/fish/crct/Petitiontolist.pdf).
2160	TU suggests that the RMP revision include strong language that mandates Best Management Practices for stormwater runoff, road construction, agricultural and energy development activities. By incorporating these practices, erosion and pollutants associated with energy and agricultural operations can be minimized.
2161	Finally, please include the latest extensive water quality report for southwest Colorado being prepared by the Colorado Oil and Gas Conservation Commission staff (http://cogcc.state.co.us/staffreport)
2162	For all the reasons identified above, Colorado TV urges the UFO RMP Planning Team to analyze the benefits and implement a watershed management approach similar to the one taken by the Beaverhead - Deerlodge National Forest, especially within watersheds that contain conservation populations of Colorado River cutthroat trout or watersheds that are suitable for reintroducing Colorado River cutthroat trout and provide protections in the form of NSOINGD stipulations.
2322	As our nation's population grows, it will be ever more important to protect our wild lands and watersheds, to insure that we have clean water and space to "recharge" ourselves away from populated areas.
2326	Please, don't allow development that can pollute the ground water and streams. Many companies say they don't cause pollution but don't follow through on that promise.
2378	The RMP's scientists should also self-evidently impose strict limits upon uranium and other mining, to protect our land, air and water from atmospheric and water emissions, run-off and other poisonings.
2401	I recently watched a TV documentary on the "fracking" method of extracting gas and oil in Colorado and other states that is highly hazardous to the health of residents due to the resulting water supply contamination. The devaluation of homes and property in the affected areas was devastating, but the worst ramification was the severe, chronic and irreversible health issues suffered by humans and animals. PLEASE do not allow unrestricted mining!
2482	The RMP should impose strict limits on uranium and other mining to protect our land, air (need to impose strict air quality standards in addition to Federal requirements), and water, especially our subsurface water aquifers.
2618	Maintenance of water tables in riparian and wetland areas should be a mandate because water is precious in arid environments and BLM should not sacrifice soil and ground water storage to activities such as grazing and trampling of livestock or OHVs. Buffers for all uses must be established to restore these degraded systems. They should be closed to livestock to control coliform pollution, provide a buffer to protect water quality, limit erosion and sedimentation and due to the importance for wildlife.
2668	We need to conserve our wilderness and our area of clean water.
	Soil Resources
602	In areas where there are soil erosion concerns or other environmental concerns, activities may need to be restricted.
1229	In addition to the Wild & Scenic Rivers eligibility there are several areas within the RMP planning process which warrant additional comment. Travel Management, Water Quality and Soils are of concern to the River District.
2146	The UFO RMP Preparation Plan identifies sedimentary rocks throughout the planning area that erode into soils containing gypsuro and selenium minerals. Dissolved concentration and loads of these two $111ts in local rivers can create water quality concerns for humans, animals, and plants. Ttl requests that complete and update soil profiles be included in the new RMP. There is considerable research available that illustrates the negative and 1ong-term impacts sedimentation and erosion have on a resource, whether it is to plants, air quality, riparian areas or streams, rivers, and lakes.
2147	In the interest of future energy development in these areas, TU suggests stronger setback implementations using No Surface Occupancy/No Ground Disturbance stipulations (NSO/NGD) and reclamation standards that

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	prevent disturbance to sensitive soils while incorporating stipulations for other less sensitive but erodible areas.
2148	The presence of coldwater fisheries, including the Colorado River cutthroat trout which occupy this resource area, arc vulnerable to soil erosion and sedimentation. Effects on fish include direct and sub-lethal effects that could threaten the existence of coldwater fisheries. Mortality, disease, reproduction, growth and behavioral impacts, and impacts to the fisheries food supply can be linked to sedimentation issues. The control of sedimentation dynamics is once of the most beneficial services that can occur with successful management of sensitive soil areas. This includes the management of riparian areas adjacent to coldwater fishery systems (C.F. Rabeni. and M.A. Smale. 1995. Effects of Siltation 011 Stream Fishes and the Potential Mitigaring Role of the Buffering Riparian Zone. Hydrobiologia. 303(1-3):p. 211-219). By implementing larger riparian setbacks or buffer zones into the RMP in sensitive areas, the UFO will be able to maintain biological diversity, native species populations, and provide opportunity for the diverse multiple uses which occur within this resource planning area. Further discussion and suggestions for riparian and stream protection follows.

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156	In addition, an accurate analysis of climate, precipitation and land health must be considered for a meaningful analysis.
260	Drought Management/Climate Change- Drought and climate change and management actions dealing with those situations may have an adverse effect on our ability to provide water for our projects.
283	I would like to see further expansion of an adaptive management paradigm that seeks to balance stakeholder input with the scientific and technical expertise of agency staff (botanists, hydrologists, archaeologists and range managers). This could include: adjusting stocking rates to buffer against projected increases in mean air temperature and evapotranspiration; restricting or eliminating non-renewable energy and mineral extraction that threatens ground and surface water with contamination; and controlling invasive species where they directly threaten native ecosystem integrity.
971	Increasing need to protect lands due to increasing drought and increasing demand and use by OHV's by restricting and limited OHV's and restricting and limiting livestock grazing.
1941	Analysis of impacts will consider potential interaction between management decisions and changes in the larger social and ecological context. In particular, impacts will be analyzed to consider potential interaction with larger-scale dynamics such as climate change; proliferation of invasive species, insects, disease and wildfire; exurban development; changing recreational patterns, and the like.
2022	Climate Change and wildlife corridors Among the many initiatives addressing climate we note an interagency Forest Service/BLM effort, focused on the Gunnison Gorge and coordinated by Betsy Neely of the Nature Conservancy. The group is looking at the science and apparently meeting regularly. Wildlife connectivity is being addressed by, among many others, Paul Beier of the University of Arizona.
2152	Protecting water quality requires more than the conservation efforts of headwater stream (illegible) conservation efforts. Or development avoidance of riparian zones. Climate change discussion and management implications should be included in the revised RMP. In Colorado, air temperatures have already waned by -2 degrees F in the past 30 years (Colorado Water Conservation Board. 2008. Colorado climate change: A synthesis to support water resource management and adaptation. Climate Change in Colorado. University of Colorado at Boulder. http://cwch.state.co.IlslHomeiClimateChange/ClimateChangeInColoradoReport;D. By conserving and using water more efficiently, restoring riparian and stream areas, managing water quality, and providing management guidelines for protecting sensitive trout and aquatic species, we will increase the ability to adapt to climate change fluctuations and dissipations (Williams, J .E.. A.L. Haak, N.G.Giliespie, H.M. Neville, and W.T. Colyer. 2007. Healing troubled waters: preparing trout and salmon habitat for a changing climate. Trout Unlimited, Arlington, Virginia. Available: www.tu.org; Williams, .LE .. A.L. Haak, H.M. Neville, and W.T. Colyer. 2009. Potential consequences of climate change 10 persistence of cutthroat trout populations. North American Journal of Fisheries Management 29:533-548. 2009).
2315	I would also ask you, as managers of our public lands, to take into consideration the larger picture of global warming. I quote Amory Lovins from Rocky Mtn. Institute "We have the technology now for solving this issue of global warming." I am wondering why we continue to pursue drilling for fossil fuels, when we clearly need to change our energy sources to renewable. When, if not now, can this vital issue be addressed? I am asking you to please take this larger issue into consideration during your current resource management plan revision.
2613	Drought management should close all allotments during years of below normal precipitation due to the long recovery times for native plants when grazed and during dry years. This is especially the case for plant communities and soils that are already damaged. Forage should be allocated 100% to wildlife and watershed protection during below normal years, which occur more than half the time.
2838	Climate Change The Uncompahgre planning area will undoubtedly experience real effects of climate change during the 20 year period that the RMP is in effect. The RMP must analyze climate change both in terms of mitigating contributions to climate change from management decisions and adapting to inevitable impacts of climate change. We strongly encourage BLM to address the impacts of climate change both from land management actions and to the resource area in this planning revision. There is a global scientific consensus that human-induced climate change is currently altering the landscape and ecological functions at an unprecedented rate. According to the U.S. Climate Change Science Program, the Southwest landscape could be greatly transformed due to drought, wildfire, invasive species, and rising temperatures (4°F to 10°F above the historical baseline). It is imperative that BLM, as the primary landowner in the area, consider, analyze, and mitigate the impacts of global climate change in this management plan revision.

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2839	BLM must take a hard look at climate change impacts to the ecosystem from climate change include shrinking water resources; dust-covered snowpack causing earlier, faster snowmelt; invasion of more flammable non-native plant species; soil erosion; loss of wildlife habitat; and larger, hotter wildfires. Many of these impacts have been catalogued in recent studies by federal agencies showing the impacts of climate change specifically in the United States such as the recent report entitled Global Climate Change Impacts in the United States, available at http://www.globalchange.gov/publications/reports/scientific-assessments/us-impacts. On September 14, 2009, Interior Secretary Salazar issued Secretarial Order (S.O.) No. 3289. This order unequivocally mandates all agencies within the Department of Interior to "analyze potential climate change impacts when undertaking long-range planning exercises, setting priorities for scientific research and investigations, developing multi-year management plans, and making major decisions regarding potential use of resources under the Department's purview." S.O. 3289, incorporating S.O. 3226 (emphasis added). The Uncompahgre RMP revision falls squarely under this guidance and BLM must assess impacts from the proposed actions that may directly, indirectly, or cumulatively result in exacerbating climate change within this document. The BLM must fully analyze the cumulative and incremental impacts of the proposed decisions in the RMP. Center for Biological Diversity v. National Travel Safety and Highway Administration, 538 F.3d 1172,1217 (9th Cir. 2008). In CBD v. NTSHA, the NTSHA failed to provide analysis for the impact of greenhouse gas emissions on climate change and was rebuked by the U.S. Court of Appeals for the Ninth Circuit, which observed that "[the impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis that NEPA requires agencies to conduct." 538 F.3d at 1217. For example, off-road vehicle designations, oil and gas management stipulations, and renewable energy development may significantly increase or reduced greenhouse gas emissions contributing to climate change and must be analyzed under NEPA. Further, NEPA regulations require that NEPA documents address not only the direct effects of federal proposals, but also "reasonably foreseeable" indirect effects. These are defined as: Indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." 40 C.F.R. § 1508.8(b). For example, the U.S. Climate Change Science Program working group published a report on September 11, 2007 which predicts and elaborates on the widespread impact of climate change on public lands arid regions. See U.S. Department of Agriculture, The effects of climate change on agriculture, land resources, water resources and biodiversity, available at http:Uwww.c1imatescience.gov/Library/sap/sap4-3/default.php. That report notes that "the climate changes that we can expect are very likely to continue to have significant effects on the ecosystems of the United States." Id. at 3 (emphasis added). These significant impacts include: • Climate effects on disturbances such as fire, insect outbreaks and wind and ice storms are very likely important in shaping ecosystem structure and function; • Grasslands will transform into woody shrublands with reduced capacity for water absorption and greater vulnerability to channelization and erosion; • Droughts early in the 21st Century are likely to increase rates of perennial plant mortality in arid lands, accelerate rates of erosion and create opportunities for exotic plant invasions; • Proliferation of non-native annual and perennial grasses are virtually certain to predispose sites to fire. The climate-driven dynamics of the fire cycle is likely to become the single most important feature controlling future plant distribution in U.S. arid lands; • Climate change is likely to result in shrinking water resources and place increasing pressure on montane water sources to arid land rivers, and increase competition among all major water depletions in arid land river and riparian ecosystems; • Major disturbances like floods and droughts that structure arid land river corridors are likely to increase in number and intensity (with associated increases in erosion and native plant loss); • Land use change, increased nutrient availability, increasing human water demand and continued pressure from exotic species will act synergistically with climate warming to restructure the rivers and riparian zones of arid lands; • Climate change will increase the erosive impact of precipitation and wind; • Surface soils will become more erodible; • Increases in wind speed and gustiness will likely increase wind erosion. Id. at 9. While these findings are dramatic, the report further notes that "[i]t is likely that these changes will increase over the next several decades in both frequency and magnitude, and it is possible that they will accelerate." 'd. at 23. A report released last year by the Bipartisan Policy Center and edited by the Wildlife Management

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	Institute, provides detailed information about the impacts of climate change on fish and game. See http://www.seasonsend.org/downloads/SeasonsEnd.pdf. The Season's End report is not only edited by the Wildlife Management Institute, 28 but quotes a number of biologists in various state fish and game agencies. It is clear from this report that it is indeed possible to use modeling to determine losses of stream habitat for various temperature and climate scenarios. 'd. at 31. Finally, the BLM should take advantage of the special conditions of the landscape to advance the important study of global climate change. Due to the fact that BLM is the primary landowner in the area, it is well-suited to provide a scientific model in ongoing research on global climate change by regularly monitoring and reporting on the ecological conditions of the area. This RMP revision provides BLM with the opportunity to collect vital data on climate change in the region to inform the global scientific community. Recommendation: Pursuant to agency policy and case law, BLM must address the impacts of climate change from the proposed action. We recommend that the EIS for this plan incorporate a landscape-level analysis of how the proposed management decisions may contribute to or assuage climate change. The BLM must also evaluate how predicted shifts in climate may lead to an altered management regime in the future. 28 According to its website, the Institute's work is done by "resource personnel [who] are highly trained and experienced wildlife science and management professionals, typically working away from the public limelight to catalyze and facilitate strategies, actions, decisions and programs to benefit wildlife and wildlife values:' http://www.wildlifemanagementinstitute.org{. It has been in existence for nearly 100 years.
2840	BLM must develop a range of reasonable alternatives minimizing the adverse effects of climate change from the proposed action In addition to the agencies' duty to take a hard look at the impacts of climate change to and from the proposed vegetation management plan, the agencies must also include a range of alternatives that includes a strategy for mitigating these impacts. CEQ regulations instruct agencies to consider alternatives to their proposed action that will have less of an environmental impact. 40 C.F.R. § lSOO.2(e) states that "[f]ederal agencies shall to the fullest extent possible:: Use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment." A June 2008 report, prepared by the Environmental Protection Agency, specifically "identifies strategies to address management challenges posed by climate change for a subset of federally protected lands and waters. These strategies can also be broadly applied to other lands and waters managed by governmental or nongovernmental entities." U.S. Climate Change Science Program Final Report, Synthesis and Assessment Product 4.4, "Preliminary Review of Adaptation Options for Climate-Sensitive Ecosystems and Resources" (June 2008), available at http://www.epa.gov/ord/npd/pdfs/gcrpfactsheet SAP-4-4.pdf. This information should be included in the analysis of the proposed action in order to craft a reasonable range of management alternatives for addressing climate change. Recommendations: Proposed alternatives for the RMP should include those that help public lands and resources or proposed projects mitigate climate change or build resiliency to the potential effects of climate change. The RMP should incorporate adaptive management solutions that include monitoring of ecosystem conditions and changing strategies in order to protect the resources of the area and ensure the preservation of important ecosystem services in the face of climate change.
2841	BLM must take steps to prevent unnecessary or undue degradation from climate change In addition to consideration of impacts from climate change, BLM must also minimize adverse impacts from climate change under FLPMA. FLPMA provides that BLM must "take any action necessary to prevent unnecessary or undue degradation to managed resources." 43 U.S.C. §1732(b). Intertwined with this provision is a similar responsibility for BLM to manage public lands "without permanent impairment to the productivity of the fond and the quality of the environment. "43 U.S.C. §1702(c). These provisions combine to necessitate on-the-ground implementation of climate change policies. Recommendations: Under FLPMA's mandate to prevent unnecessary or undue degradation, BLM must consider how prescriptions in the RMP will minimize adverse impacts of climate change to the resource area.
2842	BLM must develop adequate monitoring strategy to address unforeseen management challenges in the face of climate change In order to respond to the land management challenges presented by climate change, the agencies must have the best available data as well as a strategy in place to respond to uncertainties as they arise. A vigilant science-based monitoring system should be set out in the RMP in order to address unforeseeable shifts to the ecosystem. A detailed monitoring approach is also required under the BLM's planning regulations: The proposed plan shall establish intervals and standards, as appropriate, for monitoring and evaluation of the plan. Such intervals and standards shall be based on the sensitivity of the resource to the decisions involved and shall provide for evaluation to determine whether mitigation measures are satisfactory, whether there has been significant change in the related plans of other Federal agencies, State or local governments, or Indian tribes, or

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	whether there is new data of significance to the plan. The Field Manager shall be responsible for monitoring and evaluating the plan in accordance with the established intervals and standards and at other times as appropriate to determine whether there is sufficient cause to warrant amendment or revision of the plan. 43 C.F.R. § 1610.4-9 (emphasis added). Such vigilant monitoring is absolutely necessary in order to create an effective adaptive management framework in the face of climate change. Recommendation: A vigilant science-based monitoring system should be set out in the RMP in order to address unforeseeable shifts to the ecosystem due to the best available information on climate change. This should include coordination with the DOI's Climate Change Response Council, Regional Climate Change Response Centers, and landscape Conservation Cooperatives as established in S.O. 3289.

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2789	Wildlife Viability Science-based 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 (Le. species adaptation, extreme variability in natural processes)-it is imperative that the BLM, the Uncompahgre Field Office and this RMP employ effective and efficient science-based planning and analysis methods to support robust and legitimate decision-making processes. The effective application of science to land management planning and decision-making requires three "essential ingredients": • Well-defined, measurable standards (e.g. wildlife population or habitat condition targets), developed via robust public involvement processes • 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 Governors' Association) • Consistent implementation of science-based analysis and decision-making (i.e. dedicated funding for monitoring and science-based adaptive management processes) The Uncompahgre RMP should consider these essential elements as it moves forward with efforts to respond to the pressing land management challenges of the coming decades. Well-defined standards Providing functioning habitat for wildlife and ensuring the long-term persistence of wildlife populations are part of the BLM's responsibilities to manage the public lands for multiple use and sustained yield. FLPMA specifically directs that management of public lands "takes into account the long-term needs of future generations" for Wildlife, as well as other resources, and is implemented toward "achievement and maintenance in perpetuity" 43 U.S.c. §§ 1712(c)(1); 1702(c) and (h). Achieving these goals for wildlife can best be realized by establishing well-defined, measurable standards. The use of well articulated concepts and operational planning practices associated with the literature and practice of population viability assessment may provide Uncompahgre land managers with effective and efficient means of applying science-based conservation methods to wildlife planning decisions. Science-based analytical tools In order to adopt a legitimate, efficient and effective science-based planning framework, the Uncompahgre Field Office should look to the well-established conservation planning and population viability assessment literature, as well as models employed by other BLM units and neighboring agencies. 12 For example, the neighboring Grand Mesa, Uncompahgre and Gunnison (GMUG) National Forests monitor populations of "management indicator species" to measure the effects of management activities on unmeasured species and to provide insights into the integrity of the ecological systems to which they belong. The use of an indicator or focal species approach, in combination with robust knowledge of the link between species and habitats, allows managers an effective means to apply science-based principles to resource management decisions. Species such as the Red-naped sapsucker and northern goshawk (ponderosa pine ecosystems), Brewer's sparrow (sagebrush) and Colorado River cutthroat trout (aquatic) have been identified as key indicator species by the GMUG and have also been identified by Colorado's Comprehensive Wildlife Conservation Strategy and Wildlife Action Plans as species of greatest conservation concern. Indeed, to meet the challenges of 21st century land management and conservation, agencies will need to cooperate on vital management planning activities, including the sharing and co-generation of biological information. Another example of a comprehensive monitoring approach can be found in Appendix 2 "Implementation, Monitoring, and Evaluation Process" - of the Jack Morrow Hills Coordinated Activity Plan, prepared by the Wyoming BLM, available at: http://www.blm.gov/pgdata/etc/medialib/blm/wy/fieldoffices/ rock springs/imhcap/rod.Par.76416.File.dat/31apx02.pdf (and attached). We particularly note the following, as examples of the sort of detail that should be contained in the Uncompahgre RMP: • Table A17-1 Resource Management Indicators - p. 8 • Table A17-2 Indicator Detail- pp. 9-11 • Table A17-3 Measurement Detail-pp. 12-14 • Figure A17-3 CAP Management Process - p. 16 • Discussion of the JMH CAP - pp. 20-21 Landscape-level planning The adoption of a science-based approach to RMP development is also consistent with the agency's commitments in the Health lands Initiative (HLI). HLI is premised on the BLM's recognition of major changes to the landscape arising from population growth, energy development and global warming. The goal of HU is "to preserve the diversity and productivity of public and private lands across the landscape." HLI is to be implemented through specific projects, which will "enable and encourage local BLM managers to set priorities across a broader scale and mitigate impacts to an array of resources in ways not previously available to them"

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	and "give managers flexibility to identify lands where a particular resource might be emphasized in order to encourage sustained health and balance across a broader ecosystem or landscape." See, generally, HLI Factsheet at: http://www.blm.gov/pgdata/etc/medialib/blm/wo/Communications Directorate/public affairs/healthy lands initiative.Par.80058.File.dat/HII-National FY09.pdf. Implementation of the management approach described above will further support efforts to address habitat fragmentation and climate change, as discussed in later sections of these scoping comments. Recommendations: The Uncompahgre RMP should adopt planning and decision-making processes (including data collection, analysis, and monitoring) that employ measurable planning objectives at multiple biological scales (i.e. fish and wildlife populations, habitat and ecosystem conditions) to ensure viable wildlife populations. This recommendation is strongly echoed by the Western Governors' Association's Wildlife Corridor Initiative (http://www.westgov.org/index.php?option=com content&view=article&id=123&Itemid=68) and the Sportsmen for Responsible Energy Development's Recommendations for Responsible Oil and Gas Development (www.sportsmen4responsibleenergy.org). 11 Rohlf, D.J. 2004. Science, Law, and Policy in Managing Natural Resources: Toward a Sound Mix Rather than a Sound Bite. Pages 127·142 in K. Arabas and J. Bowersox, editors. Forestfutures: science, politics, and policy for the next century. Rowman and Littlefield, Lanham, Maryland, USA. 12 See U.S. Department of Agriculture, Committee of Scientists. (March 15, 1999). Sustaining the People's Lands: Recommendations for Stewardship of the National Forests and Grasslands into the Next Century, from http://www.fs.fed.us!emc!nfma!includes!cosreport!Commlttee%20of%20Sclentists%20Report.htm.
31	Many of these questions and concerns relate to our belief- which is supported by the Prep Plan and H-1601- that the RMP should consider landscape scale planning of conservation of wildlife habitat and non damaging uses much more strongly than has been done in the past. This should mean considering core areas of natural habitat and corridors connecting them, especially when planning for travel management and extractive resource development, such as oil and gas development with surface occupancy.
48	Management of remaining wildlife on public lands has become more important with the inevitable fragmentation of adjoining private land. This has to be considered by land management agencies and they must take a larger scale approach to planning. Any possible action to help plan, encourage or fund conservation easements on adjoining land is now worth it.
49	Priority species could include the remaining predators (mountain lion, bear, raptors), migratory big game (deer, elk), and some obligates (Pinyon Jay) of the habitat for which UFO is primarily responsible.
50	All of the bats from the State BLM Sensitive list that are in the UFO area Should be protected by protecting caves, shafts and structures and by improving and protecting riparian areas.
51	Current or historic Peregrine Falcon nests should be undisturbed.
52	In the case of obligate species for each habitat type, it might be easier to focus on the habitat. In either case, all of the UFO habitat types are important. In addition to riparian, sage, and semi-desert mentioned above, PJ and mountain shrub are very important for a variety of wildlife.
56	It is the responsibility of all land management agencies to monitor bird populations.
57	Planning for wildlife habitat and less damaging human uses, and preserving BLM land for future generations should be as high or higher priority as extractive uses and motorized recreation.
58	This planning [for wildlife habitat] should consider core areas of important habitat, and how to connect them, not just shunting wildlife onto what is left over from other uses. Not all uses can occur in all areas.
337	Saltado Creek Canyon is a spectacular steep sided, deep and wild canyon adjoining the San Miguel River canyon. It is the only major tributary canyon/stream to SMR that has no roads or bridges. It is a key wildlife corridor connecting Uncompahgre Plateau to the Delores Mountains and wilderness areas to south. The current level of access should be maintained and no further development of access should occur. It should be designated a "wild" river section as proposed in the WSR Eligibility Report. Hunting and grazing should be maintained with the possible exception of better protection for riparian habitat from cattle. No motorized access, other than emergency vehicles or maintenance, should be allowed. This area should be managed with wildlife being the predominant management goal. It is also prime Lynx habitat.
344	Wolves: some serious thought should be given to management of wolf populations now that there is evidence that wolves are likely beginning to penetrate the state from the northwest. While a future issue it is likely that within the life span of the RMP this issue will crop up. It would also be a very positive development as it might

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	naturally and positively impact many issues in our region such as destruction of riparian areas, over population of elk, etc.
349	Specie Creek Canyon/Creek would benefit from habitat restoration.
395	The canyons with water often have good riparian habitat where bird density and diversity reaches its highest point anywhere on the Colorado Plateau.
400	I have a complete list of birds that Brenda and I observed for Colorado Breeding Bird Atlas I that we did twenty years ago. We are currently doing it all over again for Colorado Breeding Bird Atlas II. The bird study area includes parts of Nyswonger Mesa, lower La Sal Creek, part of Dolores Canyon, lower Wild Steer Canyon and the northwest corner of Skein Mesa. Our atlas work is available to anyone that would like the data or can use it. A direct comparison over a twenty year period gives this bird data a particular value.
493	Ranching, placer mining, uranium mining, wildlife developments, recreation are among some of the areas for growth.
517	Furthermore, the Monitor Creek drainage is a sanctuary for resident elk herds as well as bear. Any improved access to the Monitor Creek drainage in the vicinity of Monitor Mesa would destroy this habitat.
530	Finally, wildlife corridors should be maintained whenever new development of any kind is contemplated. The barriers resulting from new roads and structures can be devastating to migrating animals.
555	The UFO also supports populations of both Rocky Mountain and Desert bighorn sheep. Rocky Mountain bighorn are present on and adjacent to BLM lands near Sawpit and Deep Creek. Desert bighorn occupy portions of the Uncompahgre Plateau from Big Dominguez Creek to the Roubideau. Science and research demonstrate that wild sheep can acquire various diseases through contact with domestic sheep. The most damaging is 6 pasturella which can lead to massive die offs of bighorn. There are presently active domestic sheep allotments that overlap with both Rocky Mountain and Desert bighorn herds within the UFO. The RMP should include policy and direction to complete risk assessments for these sheep allotments that determine the potential of contact between wild and domestic sheep. Any risk of contact should be eliminated by removing the domestic sheep from the allotments or implementing management actions that will prevent or minimize contact between wild and domestic sheep. Primary ranges for wild sheep should be identified and managed for these native species. Any active or inactive domestic sheep allotments that overlap these wild sheep habitats should be closed to sheep grazing or trailing. Placing a time limit of five years to complete this action should be included in the RMP to resolve any conflicts before we loose the wild sheep.
588	Disturbance to wildlife should be minimized.
614	I would like to support any of your efforts that would maintain the natural habitat of the BLM areas under review. I think the unfragmented habitat and ecosystem are important for the wildlife, as well as human enjoyment.
801	My husband and I love the fact that we live on the edge of this great public land. We love hearing the coyotes howling out there.
970	Need for seasonal closures to protect big game winter range and provide security areas for wildlife.
1000	Many uses can be compatible with preserving these systems if done carefully. Grazing, hunting and wildlife management should be done with more attention given to the health of the ecosystem than to the size of the "harvest."
1171	The effects of resource management activities on area ecology, including vegetation, wildlife and its habitats, as well as recreational hunting and fishing activities, should be disclosed and evaluated in the RMPIEIS. This is particularly important for the WSAs and ACECs contained in the planning area. Important vegetative issues include reclamation activities supportive of pre-existing land uses (e.g., wildlife habitat), noxious weed management, and any adverse impacts to BLM State sensitive plants, and/or compliance with executive orders concerning invasive species, flood plains, or wetlands and riparian zones. Important wildlife issues include compliance with BLM, USFWS, or State wildlife management objectives, wildlife mortality, crucial wildlife habitat, adverse impacts to breeding or nesting activities, disruption of migratory routes, increased wildlife harassment, hunting pressure, wildlife displacement, and/or any adverse effects to Endangered Species Act listed threatened or endangered species, USFWS listed or proposed species, or BLM State sensitive wildlife or fish species. BLM should examine these issues together with cumulative impacts from other development. The RMP/EIS should include mitigation measures that may be undertaken to minimize or eliminate adverse impacts

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	from the alternatives considered. Monitoring and routine inspections of the restored areas should occur. If necessary, watering may. Temporarily be needed to ensure successful re-vegetation.
1195	With regard to the 40-acre tract that straddles the Uncompahgre River and includes the RiverWay Trail, the Town notes the specific importance of this tract in terms of trail connectivity, wildlife (the site is occupied by many species including deer, fox, badger, herons and roosting bald eagles), and passive recreational uses including picnicking, hiking and wildlife viewing. Notably, the parcel abuts a Town owned park (Dennis Weaver Memorial Park) and trail connectivity and possible pedestrian bridge access may be enhanced between these two parcels. The Town would like to partner with BLM in meaningful ways to explore these ideas and assist in the needed stewardship of this 40-acre parcel.
1942	Analysis of impacts will consider potential interaction between management decisions and changes in the larger social and ecological context. In particular, impacts will be analyzed to consider potential interaction with larger-scale dynamics such as climate change; proliferation of invasive species, insects, disease and wildfire; exurban development; changing recreational patterns, and the like.
1963	We encourage BLM coordination with other agencies, including the Forest Service (USFS) and Fish and Wildlife Service (FWS), to ensure protection of the extended riparian ecosystem. A guideline for inter-agency coordination is presented in the Unified Federal Policy for a Watershed Approach to Federal Land and Resource Management (UFP). Effective since October 2000, this policy is "intended to provide a framework to enhance watershed management for the protection and the health of ecosystems on Federal lands" (2). The UFP is not a regulation, nor does it establish a regulatory program. However, it does call on inter-agency collaboration to restore and protect water resources within the framework of existing laws and regulations. Because many of the eligible segments originate on USFS lands before flowing through BLM lands, we ask that the two agencies work together to ensure the protection and enhancement of water resources and aquatic ecosystems. Furthermore, the presence of endangered species in many segments should involve the FWS in the decision-making process. This collaboration would facilitate conservation practices that consider the entire riparian ecosystem, not just the individual BLM-administered segments. The RMP revision process is an opportune time for the BLM, USFS and FWS to work together to better protect and enhance the riparian ecosystems and their wildlife.
1990	Reducing route densities UFO wildlife populations in the UFO are increasingly stressed by human access spreading into previously less-used places via ORV and mountain bike proliferation, shed anterling, lion hunting, rock climbing, etc., in combination with mining, grazing and other traditional uses.
2004	Seasonal closures These are important, follow DOW recommendations
2058	Wildlife Habitat & Sensitive Species Management Given the diversity of flora and fauna range and habitat found in this portion of the Dolores basin -Mule Deer, Elk, and Wild Turkey winter range as well as Gunnison Prairie Dog colonies and the location of three CNHP Potential Conservation Areas (Dolores Canyon South, Dolores River -Slick Rock to Bedrock, and Dolores River-Uravan to Roc Creek) -great care should be taken to follow the planning and management guidance for these resources as outlined in the "Wildlife Viability", "Special Status Species/Plants", and "Travel Management" sections of the broader conservation group comments referenced earlier. We also encourage the incorporation of directives outlined by the Center For Native Ecosystems in their scoping comments.
2063	This is an outstanding natural landscape, which includes several unique plant and animal communities and provides one of the most spectacular recreational boating experiences in the country
2082	Plus, the overwhelming need on this particular landscape is not for ~motorized routes, but for more unroaded, undisturbed backcountry for wildlife and quiet users alike!
2084	Next Steps Identifying less roaded areas like this could be a first step in identifying other values that make these lands worth protecting. As an example, we visually correlated the highlighted areas with maps of deer severe winter range and elk winter concentration areas, to hone in on their wildlife values. Several of the areas for example are used by wintering big game.
2091	Final Step The final step involves management direction, giving the areas non motorized and perhaps nonmechanized management prescriptions, identifying levels of protection for plants and wildlife, levels and intensities of quiet use, whether the areas will be identified as ERMAs or SRMAs, finding citizen adopt groups, etc.

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2101	Saw Tooth Ridge is in mule deer severe winter range.
2103	The area contains an elk winter concentration area according to the enclosed elk map.
2105	The PCA doubles as an elk winter concentration area according to the enclosed map. The combined areas have a diversity of vegetation and rare plants, and likely many other worthwhile values that could be identified by overlaying GIS resource maps.
2108	Rock Creek/Carpenter Flats North of Saucer Basin is a steep southern wall of Rock Creek Canyon that appears to be roadless and worthy of study. Deep canyons and tributaries like these are epicenters of biodiversity on this exposed landscape harboring a rich diversity of birds including cliff-dwelling raptors and unique plant and riparian communities. Regarding biodiversity in western states one estimate is that 98% is found in riparian corridors.
2113	Nyswonger Mesa is an example of an area that should be actively analyzed by the BLM for its forage and wildlife values and for its potential to be set aside as a rare and needed quiet use area.
2116	Sharp Canyon West of Nyswonger Mesa another roadless area is marked on the map in the vicinity of Sharp Canyon. This area is in an elk winter concentration area and further GIS analysis would likely show other values that would benefit from keeping the area non-motorized.
2119	Wray Mesa While not roadless, we note that this area is Desert big horn sheep habitat with good condition grasslands. It needs to have a spring seasonal motorized closure to protect big game.
2134	The BLM should detail in the UFO RMP how public lands within the UFO management unit will be managed for a balance of uses, as required by the Federal Land Policy and Management Act (FLPMA). The FLPMA mandates multiple-use on BLM administered lands. The RMP must address the current and future effects of management and development on outdoor recreation and fish and wildlife conservation with regard to several key species including elk, mule deer, trout, bighorn sheep, pronghorn antelope, turkey, black bear and mountain lion
2141	Under CEQ NEPA regulations, BLM must make use of all the best available scientific information to assess the effects of land management actions, including cumulative effects from existing, proposed, or foreseeable development projects in the resource management area. Referenced below are peer-reviewed scientific studies on the impacts on sage grouse, elk, and mule deer from vehicle traffic, roads, and oil and gas development. The information from these studies should be incorporated into the UFO draft RMP and DEIS.
2142	Sage Grouse: Connelly, J. W., S. T. Knick, M. A. Schroeder, and S. J. Stiver. 2004. Conservation assessment of greater sage-grouse and sagebrush habitats. Western Association of Fish and Wildlife Agencies, Cheyenne, Wyoming, USA. Colorado Greater Sage-Grouse Conservation Plan Steering Committee. 2008. The Colorado Greater Sage-Grouse Conservation Plan. Colorado Division of Wildlife. Denver, CO. Unpublished Report. Holloran, Matt J. 2005. Greater sage-grouse (Centrocercus urophaisianus) population response to natural gas field development in western Wyoming. PhD Dissertation, Univ. of Wyoming. Laramie, WY. 211 pp. Available at: http://www.sagebrushsea.org/ Walker, B. L., D. E. Naugle, and K. E. Doherty. 2007. Greater sage-grouse population response to energy development and habitat loss. Journal of Wildlife Management. Available at: http://www.forestry.umt.edu/personnel/faculty/dnaugle/pdfs/Sage-grouse%20Lek%20Analysis_JWM(in_press).pdf Doherty, K. E., D. E. Naugle, B. L. Walker, and J.M. Graham. 2008. Greater sage- grouse winter habitat selection and energy development. Journal of Wildlife Management. Available at: http://www.forestry.umt.edu/personnel/faculty/dnaugle/pdfs/Sagegrouse%20winter%20habitat%20and%20energy_JWM(in_press).pdf Stiver, S.J., A.D. Apa, J.R. Bohne, S.D. Bunnell, P.A. Deibert, S.C. Gardner, M.A. Hilliard, C.W. McCarthy, and M.A. Schroeder. 2006. Greater sage-grouse comprehensive conservation strategy. Western Association of Fish and Wildlife Agencies. Unpublished report. Cheyenne, Wyoming
2143	Moving forward with the RMP and EIS process we expect the specific comments and recommendations found in this document to be addressed. We also expect the UFO RMP to directly address the ecological requirements of several key game species including mule deer, elk, turkey, mountain lion, desert and rocky mountain bighorn sheep, black bear, pronghorn antelope, sage-grouse and trout in relation to BLM administered lands in the management unit. These species' ecological requirements should be addressed by a specific plan of action in the form of a habitat and/or species management plan or similar and should occur on all relevant spatial scales to ensure proper management and coordination over the short- and long-term. Special considerations must be given to the high-valued and often-used hunting areas outlined earlier.
2144	In our view, there needs to be a new strategy to conserve fish and wildlife habitat and associated hunting and

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	fishing recreation while minerals are being extracted from all federal public lands, including BLM lands. The current strategy employed by BLM in Wyoming, Colorado, Utah and other states, has and is resulting in unreasonable losses of fish and wildlife resource values that hunters and anglers believe are avoidable with a new approach to public lands management. The TRCP stands ready to assist the UFO in devising a RMP that balances the needs of fish, wildlife and their habitat with responsible energy development.
2171	We have provided specific considerations for native fish habitat (both occupied and potential habitat) management that includes the enhancement, protection and landscape or watershed scale habitat recognition. Incorporating updated mapping scenarios, wildlife and fish data from state resource management agencies, and applying best management practices to energy and livestock development activities all lend themselves to better fish and wildlife management.
2172	Identification of big game migration corridors will be key to protecting the integrity of big game populations and providing the hunting public some measure of assurance for future hunting opportunities.
2173	Similarly, by increasing buffers within riparian zones to protect fisheries and associated ecosystems, anglers can expect continued fishing Success and quality fishing experiences.
2191	We urge you to preserve BLM land for future generations and to favor the following low-impact uses: Large blocks of undisturbed, unfragmented habitat. Corridors of natural habitat that protect core areas. Integrity of ecosystems and wildlife habitat.
2234	Prairie dogs and associated species. The UFO can play a major role in recovering prairie dogs and species dependent on prairie dogs by managing to increase prairie dog numbers and to increase the area occupied by large prairie dog towns. Burrowing owl, (wintering) feruginous hawk, golden eagle, long-nosed leopard lizard, and kit fox could be preserved by good conservation of the two prairie dog species' habitats. Management actions could include restrictions on motorized travel, restrictions on shooting in prairie dog habitat, prohibiting surface disturbance due to oil and gas drilling, and managing vegetation to benefit prairie dogs, notably control of cheat grass and other weeds.
2237	Bighorn sheep The UFO supports populations of both Rocky Mountain and desert bighorn sheep. Rocky Mountain bighorn are present on and adjacent to BLM lands near Sawpit and Deep Creek. Desert bighorn occupy portions of the Uncompahgre Plateau from Big Dominguez Creek to the Roubideau. Research demonstrates that domestic sheep can give wild sheep disease, including pasturella, which can cause massive die offs of bighorn. There are presently active domestic sheep allotments that overlap both Rocky Mountain and desert bighorn herds within the UFO. The RMP should plan to gradually phase out allotments that overlap wild sheep habitat.
2239	Yellow-Billed Cuckoo The BLM should protect all riparian areas that are capable of supporting any cottonwood species in order to increase the low population of Yellow-Billed Cuckoos. The desired outcome for Yellow-Billed Cuckoo would be protection of all riparian areas that are capable of supporting any cottonwood species, and increasing the low population of cuckoos. This would require eliminating tamarisks and Russian knapweed, (and replacing them with native species), encouraging regeneration of cottonwoods, and maintaining large areas of large shrubs beneath and adjacent to the cottonwoods. This would also benefit countless other species of birds, bats and other wildlife. Willows may not affect cuckoos but are critical for other species.
2240	Fish, Wildlife and Migratory Birds: Management of remaining wildlife on public lands has become more important with the inevitable fragmentation of adjoining private land. This has to be considered by land management agencies and they must take a larger scale approach to planning. Any possible action to help plan, encourage or fund conservation easements on adjoining land is now worth it.
2241	Priority species and habitats (in addition to SSS): Priority species could include the remaining predators (mountain lion, bear, raptors), migratory big game (deer, elk), and some obligates (Pinyon Jay) of the habitat for which UFO is primarily responsible. All of the bats from the State BLM Sensitive list that are in the UFO area should be protected by protecting caves, shafts and structures and by improving and protecting riparian areas. Current or historic Peregrine Falcon nests should be undisturbed. In the case of obligate species for each habitat type, it might be easier to focus on the habitat. In either case, all of the UFO habitat types are important. In addition to riparian, sage, and semi-desert mentioned above, PJ and mountain shrub are very important for a variety of wildlife. Desired conditions of all of these habitats are more late seral stages than usually exist now, less fragmentation and better connectivity, and fewer weeds. The shrubs/understory are very important to wildlife in PJs and riparian areas. Non-native weeds are especially important in riparian areas and semi-desert

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	shrub habitat. Rocky Mountain Bird Observatory studies being done for the Tamarisk Coalition on the Colorado Plateau Rivers show that all bird species are less common when tamarisk make up most of the understory. Literature that indicates tamarisk may not be quite as bad may be comparing them to no understory, rather than to native shrubs. Any management activity that affects native vegetation seems to affect some wildlife species.
2356	Thank you for the opportunity to comment on the Uncompahgre RMP revision. i have on these lands during my early middle years. I remember the Uncompahgre Field Area and I I was enamored of its wilderness-quality lands, wild rivers, and opportunities for quiet, backcountry recreation. The resource area is also home to important and imperiled wildlife, such as Gunnison sage grouse, that rely on large intact tracts of habitat free from roads and other infrastructure.
2358	We want our kids to see the animals we have seen.
2403	I recently watched a TV documentary on the "fracking" method of extracting gas and oil in Colorado and other states that is highly hazardous to the health of residents due to the resulting water supply contamination. The devaluation of homes and property in the affected areas was devastating, but the worst ramification was the severe, chronic and irreversible health issues suffered by humans and animals. PLEASE do not allow unrestricted mining!
2407	There are also endangered wildlife here that need us to protect this place.
2473	Colorado the Beautiful....but not for long. If all the unique landscape is changed and all the wildlife with it. Think about it.
2586	I can't tell you how important it is to me and to the wildlife to protect this unique area.
2619	Predator Control should be eliminated and let natural processes occur. Owners of livestock grazed on public lands must accept this risk. It is time to allow coyotes, foxes, badgers, ravens, mountain lions and others to function in their role of keeping deer out of riparian zones, controlling rodent populations, consuming carrion and providing the ecosystem benefits that come with predators. Livestock owners should not be allowed to kill predators as there are many methods they can use to protect their livestock that don't result in killing of predators.
2628	The DEIS must analyze the role and values of predators in controlling rodent populations and fulfilling their role in a healthy ecosystem. This is addressed here under Livestock issues because the reason predators are persecuted is the failure of the livestock industry to manage their livestock and the blame is placed on predators for losses. Studies have documented the importance of predators to restoration of plant communities, particularly riparian and aspen areas. These have correlated loss of cottonwood recruitment with extirpation of wolves and increased elk browsing in Yellowstone NP; demonstrated the loss of cottonwood recruitment and riparian degradation in Zion NP where cougar populations have been eliminated, resulting in deer consumption of cottonwood seedlings, while in areas with cougars, healthy riparian areas and cottonwood recruitment occur; postulated the elk/wolf relationship in YNP will rebalance plant community structure, including aspen; in Banff NP, wolf exclusion decreased aspen recruitment, willow production and increased browsing intensity; and documented aspen decline associated with removal of wolves in YNP. In addition to the role of predators in restoring ecosystem function, predator control efforts cost lives in helicopter crashes and other means; disturb non-target wildlife with helicopters, airplanes, off-road vehicles and human disturbance; and place humans and their pets at risk from M44s, snares, leg-hold traps and other obnoxious means. BLM must take a pro-active stance in eliminating this practice as it represents a basic conflict between livestock, wildlife and recreational users
2637	Road densities must be analyzed nor have their effects on wildlife been analyzed. Researchers, including those with the Forest Service have documented the effects of roads and OHVs on wildlife and the benefits of roadless areas. For example, Gilbert , Noss and Wisdom et al describe the detrimental effects of road density and human activity on large mammals causing large displacements away from roads and mechanized activity.
2670	We are losing species every day to extinction.
2750	Our wildlife is essential to everyone, please do not let anyone or anything destroy it.
2773	Support wildlife in their struggle to survive.

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Comment ID	Comment
	Vegetation- General
60	All of the UFO's habitat types are important for some species, and most of those species need more larger, older vegetation. Both the overstory and understory should be in the historic range of variability of age classes.
36	Desired outcomes for vegetation would be to have a pre-settlement variety of age classes.
37	Late seral/old growth should not be disturbed, since it is almost always underrepresented and is required for most obligate bird species in all habitat types.
40	Natural fire regimes and protection from motorized travel and oil and gas surface occupancy should be considered in landscape scale planning for natural vegetation.
53	Desired conditions of all of these habitats [all UFO habitat types] are more late seral stages than usually exit now, less fragmentation / better connectivity, and much fewer weeds.
54	The shrubs/understory are very important to wildlife in PJs and riparian areas.
285	I would like to see further expansion of an adaptive management paradigm that seeks to balance stakeholder input with the scientific and technical expertise of agency staff (botanists, hydrologists, archaeologists and range managers). This could include: adjusting stocking rates to buffer against projected increases in mean air temperature and evapotranspiration; restricting or eliminating non-renewable energy and mineral extraction that threatens ground and surface water with contamination; and controlling invasive species where they directly threaten native ecosystem integrity.
553	The UFO has done an excellent job of actively managing vegetation diversity and production through wildfire rehab, prescribed burning, and mechanical treatments such as roller chopping, mowing, and harrowing. The RMP should include policy to continue these vegetation treatments on big game winter ranges to maintain carrying capacity on public lands. As I mentioned before, this program needs to include closing the project area roads and firelines to OHV's to maintain habitat effectiveness of these treatments. The UFO also needs to institute seasonal restrictions on all motorized vehicles on big game winter ranges in coordination with the US Forest Service to fully achieve the benefits of these vegetation treatments.
596	The BLM should attempt to improve the condition of lands within the planning area that do not meet standards. Since it is generally less costly to prevent problems, "lands that meet standards, but with problems" should also be considered for improvement to problem areas. Where there is a large amount of public impact, areas shouldn't be left to function "naturally" because they will be degraded over time. Public usage in these areas may need to be restricted.
598	Keeping land in optimum condition can also minimize wildfire risk.
656	Western is currently conducting tree removal activities along its rights-of-way and within its stationary facilities to ensure we are in compliance with national standards for electric reliability. These standards were established by the North American Electric Reliability Council under provisions of the Energy Policy Act of2005. Western developed a transmission vegetation management program to address reliability and designed a desired condition where vegetation within the transmission line right-of-way is maintained as a stable, low growth plant community, and the edges of the right-of-way are feathered to blur or diminish the linear characteristic of the right-of-way itself. In addition Western's program provides allowances for taller trees in riparian areas, viewsheds, and as traffic screens. We are available to meet with the Uncompahgre Field Office staff to discuss working together in a collaborative and cooperative manner to achieve outcomes desirable to both agencies. We believe our vegetation management program can support the BLM in reaching its vegetation and resource management goals.
704	I am cognizant of the fact that BLM manages its public lands under the principle of multiple use and sustained use, and must provide a balance between usage, and protection of its resources. It is my observation that BLM is doing a good job in managing livestock grazing, vegetation management for both logging and wildlife habitat, and in watershed protection.
813	As the Western Slope Botanist of Colorado Natural Heritage Program (CNHP), and a resident of Ridgway, this plan is personally important to me. My major interest is management of vegetation and rare plants.
816	Continue to survey for rare plants and update existing records. Require private contractors who conduct rare plant surveys to submit element occurrence records to CNHP as part of their contract.
818	Vegetation management: Recognize the value and scarcity of old growth pinyon-juniper woodlands, and refrain

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	from treatments to set them back to an earlier seral stage.
819	Proceed cautiously with vegetation treatments, and require pre-and post-treatment monitoring to measure the success of treatments.
822	Make every effort to require re-seeding with only native species.
823	Continue efforts to collect native seed in situ.
859	After weeds have been eradicated, native seed needs planted. Having read many of the local history books, and speaking to so many ranching families that have been in the area for several generations, I believe there used to be a lot more grass on the plateau.
877	Areas the BLM allows dispersed collection of vegetation products or public harvest need to be monitored, on the ground during and after a season of harvest is allowed.
878	Currently, no one monitors Christmas tree cutting on BLM lands north of the Transfer Road. It is very disheartening to see the beautiful, old juniper and cedar trees that are cut down each year and hauled out. Some of the trees have just been topped, tall stumps left behind and trash. People drive off road, right up to the tree they cut. The Pinion have died from the IPS beetle, is it really necessary to take more trees out? Very few of the trees we see removed have a tag on them, so we assume the cutters do not have a permit. Many years there are very few pinion nuts. Last year they had a fungus. Maybe 1 in 100 was good. (I took a sampling in to the USFS to find this out) Deer, elk, jays, and rock squirrels are just a few of the creatures who eat them in the late summer and fall, winter too if there's no snow on the ground covering them. Along with acorns, pinion nuts provide fat in the diet of wildlife. It can't be that an area is only monitored every ten years, as nature changes course sometimes in just one season. Deer and elk hang out heavily on lower BLM lands in the winter. These areas are close to town, so they are the places where people go to collect. This consistently takes food away from wildlife year after year. It's OK to bring a halt to harvesting. Yes, some people will scream. Education is crucial to help people understand the necessity of closures. Have to get people to "feel ownership" of public lands, by caring for them.
879	Waterways should be a priority, as invasive weed seeds are carried by water, and weed growth spreads quickly along the banks.
880	Areas also need addressed quickly, as in road construction, mineral extraction.
1048	More areas should be roller chopped and seeded to provide a better habitat for deer and elk.
1170	The effects of resource management activities on area ecology, including vegetation, wildlife and its habitats, as well as recreational hunting and fishing activities, should be disclosed and evaluated in the RMPIEIS. This is particularly important for the WSAs and ACECs contained in the planning area. Important vegetative issues include reclamation activities supportive of pre-existing land uses (e.g., wildlife habitat), noxious weed management, and any adverse impacts to BLM State sensitive plants, and/or compliance with executive orders concerning invasive species, flood plains, or wetlands and riparian zones. Important wildlife issues include compliance with BLM, USFWS, or State wildlife management objectives, wildlife mortality, crucial wildlife habitat, adverse impacts to breeding or nesting activities, disruption of migratory routes, increased wildlife harassment, hunting pressure, wildlife displacement, and/or any adverse effects to Endangered Species Act listed threatened or endangered species, USFWS listed or proposed species, or BLM State sensitive wildlife or fish species. BLM should examine these issues together with cumulative impacts from other development. The RMP/EIS should include mitigation measures that may be undertaken to minimize or eliminate adverse impacts from the alternatives considered. Monitoring and routine inspections of the restored areas should occur. If necessary, watering may. Temporarily be needed to ensure successful re-vegetation.
2005	Close vegetation treatment roads Vegetation treatments should not be done without the necessary resources and a plan to close all new roads. A new policy is urgently needed on this.
2021	Rare plants we encourage the BLM to protect Montane riparian forest Narrowleaf cottonwood/skunkbrush San Rafael Milkvetch Naturita Milkvetch Hellebonne Sage Sparrow Gray Vireo Peregrine falcon Canyon Treefrog Payson lupine Mariposa lily
2023	BLM Land Health Standards The Land Health Standard RMP Handout appeared to indicate the majority of UFO lands meeting standards, which is great if true. We recommend the UFO meet or exceed CO BLM state Land Health Standards for maintaining healthy watersheds, riparian areas, upland vegetation, water quality, soils and functioning habitat. A robust weed program is essential and we appreciate the weeding and restoration of

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	cottonwood and willow riparian ecosystem the UFO has been doing.
2062	This is an outstanding natural landscape, which includes several unique plant and animal communities and provides one of the most spectacular recreational boating experiences in the country
2070	Importance of less-roaded lands Due to their less roaded condition these areas may be among the few left on the landscape where vegetation is relatively intact, where forage, soil, water courses, archeologic, paleontologic and historic resources are relatively undisturbed and where wildlife security, silence, solitude, quiet use, hunting, wildlife viewing and other such qualities can still can be found.
2106	The PCA doubles as an elk winter concentration area according to the enclosed map. The combined areas have a diversity of vegetation and rare plants, and likely many other worthwhile values that could be identified by overlaying GIS resource maps.
2109	Rock Creek/Carpenter Flats North of Saucer Basin is a steep southern wall of Rock Creek Canyon that appears to be roadless and worthy of study. Deep canyons and tributaries like these are epicenters of biodiversity on this exposed landscape harboring a rich diversity of birds including cliff-dwelling raptors and unique plant and riparian communities. Regarding biodiversity in western states one estimate is that 98% is found in riparian corridors.
2112	Nyswonger Mesa is an example of an area that should be actively analyzed by the BLM for its forage and wildlife values and for its potential to be set aside as a rare and needed quiet use area.
2168	The BLM should include stronger management prescriptions for upland and riparian vegetation management. Dm: to the sensitive soil regimes that exist within this resource area, increasing the surface management stipulations to minimi7.e erosion, sedimentation, and weed infestation will benefit the sensitive and threatened and endangered fish, wildlife and plant species identification of critical habitat and management applications and mitigation parameters will help guide future energy development activities and livestock management activities.
2192	Undisturbed late seral stages of vegetation, which are increasingly rare, and upon which many species depend.
2238	Clay-loving buckwheat. All populations should have total protection from any damaging uses, especially travel
2243	All of the UFO's habitat types are important for some species, and many of those species need advanced seral stages or mature trees and other vegetation. Management should strive to ensure that both the overstory and understory of any vegetation type should be in the historic range of variability of age classes. Our primary concern is that the BLM maintain and restore healthy, functioning ecosystems and wildlife habitat. The UFO should meet or exceed the State BLM Land Health Standards pertaining to "Upland soils," "Riparian Systems," "Healthy, productive plant and animal communities," Threatened and Endangered species, and "Water quality."
2244	Vegetative treatments, such as prescribed burning and mechanical brush removal, should focus on areas that are degraded because of past heavy grazing and that need improvement to support continued grazing
2250	Harvesting by people of vegetative products should be directed toward areas slated for treatment, and/or close to well-used roads
2487	This comment on the Uncompahgre RMP revision supports adding an option calling for complete habitat restoration in the Uncompahgre RMP revision.
2612	Rangeland Health is used as a goal, yet RH, like PFC is subjective, has not been documented to result in improved conditions and is a subjective measure with great bias. Reference areas should be the standard and these should be ungrazed, and their characteristics used to judge conditions in areas grazed or used for mining, oil and gas, oil shale, tar sands, and other extractive or land disturbing uses.
2824	Retaining and Restoring Natural Forest Ecosystems Section 201 of FLPMA mandates that BLM inventory the resources of the public lands, their resources and values. 43 U.S.C. § 1711. The Preparation Plan for the RMP revision states that "[t]he Uncompahgre Field Office manages small areas of spruce/fir forests and ponderosa pine forests, and large areas of pinyon-juniper woodlands." The BLM must carefully inventory its forest resources and evaluate alternatives that do not cause adverse environmental impacts and unnecessary and undue degradation. The RMP should analyze impacts to forest resources and identify ways to minimize and mitigate these impacts for each type of forest ecosystem. We discuss management recommendations for each forest type in relevant detail below. Pinyon-Juniper Ecosystem a. Ecology According to recent research, pinyon-juniper (p-j) forests can be classified as one of the tree types as follows: 1) Persistent p-j. Canopy can range from sparse, with only scattered trees, to a fairly dense, closed canopy. Soils may be rocky and unproductive to

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	deeper and moderately productive, but this type is more often found on the former. Understory can consist of a variable cover of gasses, forbs, and shrubs, but in the dense canopied stands, any understory will be sparse. Fires probably varies in frequency, but rotations were usually quite long (440+ years), and most fires were stand-replacing. 2) P-j savanna. This type has a low to moderate density and cover of p-j, with a well-developed and nearly continuous understory of grass, along with some forbs. Shrubs, if they exist, are usually only a minor component. This type is most often found where summer precipitation constitutes a high proportion of the average annual total. The natural disturbance regime for this type is not well understood. 3) Wooded shrubland. The p-j component in this type varies from sparse to relatively dense. Shrubs constitute the main portion of the understory, and there are varying amounts of grasses and forbs. This type is most often found where winter precipitation is dominant. Fires tended to be high intensity events that killed all or most of the trees and top-killed all of the shrubs. See Romme et al, 2008, and Romme et al, 2009. It is not likely that the area covered by the Uncompahgre Field Office has or had much of type 2. See Romme et al, 2009, at 126. Extensive field research is needed to determine which types exist and what the disturbance, composition, and structural history is of each stand or area containing p-j. It is commonly thought that the increase in density and coverage of p-j forests since the beginning of the 20th Century has been caused by fire suppression, i.e., that the lack of low-intensity fire that formerly burned off young trees has allowed p-j forests to grow much more dense. In reality, the situation is more complicated than this simple scenario, and in the planning area, it does not appear to be true at all. In the persistent p-j type, fire suppression cannot be said to be responsible for any increase in density of p-j because fire was very infrequent in this type. Romme et al, 2008, 2009. It is also likely that that there are factors other than fire suppression that are helping to drive increases in p-j densities in all three of its types, including: climate change (warming since the end of the little ice age 12,000 years ago) that is favorable to tree growth; recovery from past disturbances (such as intensive logging, especially during the mining era14; chaining, a common practice in the 1950s and '60s; and periodic, and often intense, insect-caused mortality in pinyon pine); and livestock grazing, which probably favors tree persistence and increased tree density15, as has occurred on the Uncompahgre Plateau16. The relative importance of each of these in shaping our current p-j ecosystems is unknown. Romme et al, 2008. Increased atmospheric carbon dioxide, occurring from human use of fossil fuels, would also favor growth of trees, once established, over other vegetation. If fire was frequent in any of the p-j types, fire scars and dead trees would likely be easy to find. But, according to Romme et al 2008, they are quite rare or absent in areas where studies have been done. This would tend to indicate that fire may not have been frequent in any of the p-j types. Shinneman and Baker, in a study on the Uncompahgre Plateau published in 2009 (a), confirmed these findings. These researches found no fire scars on live trees, but they did find charred snags and charcoal in 41 percent of the plots they surveyed. This strongly indicates that low-intensity fires never or seldom occurred (or were so minor in coverage and frequency that any evidence of them has disappeared), while higher-severity, stand-replacement type fires did occur. Based on the data they gathered and analyzed, a fire return interval of 400-600 years in areas with p-j stands on the Plateau is suggested by the researchers. Id. Shinneman and Baker, id., also found considerable establishment of pinyon following an extended, and often severe, drought in the area that lasted from about 1620 to 1820. In other words, pinyon is responding to more favorable conditions in the last 200 years to reestablish itself on the landscape. It is important to note that the beginning of this period well precedes human settlement, which is said to have begun in earnest around 1880. Pinyon may also be have started recovering from heavy mortality from drought and from attacks of ips con/usus, a bark beetle that ravaged pinyon pine in Colorado in 2002 through about 2004. Romme et al, 2008, noted that any net increase in p-j trees may be small when viewed over a long time period, as periods of increasing density are balanced by periods of extensive mortality. In the planning area, this is much more true for pinyon than juniper, as the latter species seemed to maintain a relatively steady density over 500 years. shinneman and Baker, 2009a. b. Effects From Human Use While fire suppression does not appear to have affected vegetation in the planning area, other factors have, especially livestock grazing. Shinneman et al, 2008 found that the semi-arid ecosystems of the Uncompahgre Plateau have experienced significant declines in grass and forb cover, biological soil crust cover, native species richness, compositional evenness, and relative species abundance, occurring at both stand- and landscape-levels. Shinneman et al, 2008, at 223. This research also found that sites with the heaviest p-j overstory removal via chaining were among the most degraded, while sites that had a light thinning of p-j were less degraded. Shinneman and Baker, 2009b, cite numerous studies linking sites degraded by grazing to cheatgrass invasion. c. Restoration Needs Restoration should focus on: a) retaining existing sites with minimal degradation from natural conditions, b) removal or reduction of activities causing degradation, such as livestock grazing, and c) active restoration of some of the most degraded sites by restoring native gasses, forbs, and shrubs and eliminating or reducing non-native species. Restoring native plant species will not be easy. First, removal of non-native plant species will be necessary, especially cheatgrass (Bromus

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	tectorum). However, complete eradication of this species is not likely. See Goodrich and Huber, 1999. See also Goodrich and Rooks, 1999, who stated that cheatgrass is "explosively invading" and "highly competitive" against native species. They recommend use of non-natives to reduce the invasion of cheatgrass, especially after a large fire. However, Shinneman and Baker, 2009b, found no difference in cheatgrass coverage in areas seeded versus those not seeded after fires on the Uncompahgre Plateau. Introduced, non-native species almost always outcompete native species. See Walker, 1999. See also Erskine and Goodrich, 1999, who found dominance by introduced annuals or seeded species after fire in p-j stands with closed canopies. That means that introduced species will tend to dominate such sites, making it harder, and maybe impossible, to restore native biological diversity. It may not be possible to completely remove or greatly reduce livestock grazing. If so, other strategies can be employed such as: exclusion of stock from the most sensitive areas, seasonal closures, reduction of time that grazing is allowed in certain areas, and reduction in the number of animals allowed to graze. If native plant species are not present, removal of livestock alone will not restore these species. Seeding will be necessary. However, seeding could cause undesirable impacts, if e. g., motorized equipment or even humans walking over large areas destroyed or damaged biological crust while dropping or drilling seed. Therefore, lower-impact methods should be used, such as aerial seeding. The same seed mix should not be used over a large area, even if it consists solely of native species, as this could reduce diversity of native plant over the area seeded. See Shinneman et al, 2008. Old-growth stands should be retained. Old growth p-j stands are more structurally complex than other stands and provide habitat for many bird species. See Miller et al, 1999. It is hard to say how p-j old growth stands should be defined, but Mehl, 1992 provides a good start. It may be necessary to consider site-specific data on stand history in determining what constitutes p-j old-growth in any location. d. Management Recommendations 1. Inventory the planning area's p-j stands. To properly manage p-j, whether that means active management or not, information on the current condition (composition and structure) and the historical disturbance regimes of these areas is essential. A considerable amount of data has already be gathered for the Shinneman and Baker, 2009 study discussed above; this data can be used along with other data that is gathered. Since there is much uncertainty about the history of most p-j stands, any stands where any manipulation will be allowed should be thoroughly field surveyed. Manipulation includes, but is not limited to: commercial and non-commercial wood cutting, thinning, prescribed fire, fire use (prescribed fire after natural ignitions), extensive and/or heavy livestock grazing, roller chopping, and chaining or cabling of pj. The ever present danger is that without site-specific knowledge, any management, no matter how well intended, could result in the affected areas becoming even further outside the range of historical variability, thus making any future restoration efforts even more difficult or impossible. 2. Collect seed of native grasses, forbs, and shrubs. Use these seeds in restoration projects, or after large fires, as appropriate. 3. Reduction of pinyon and juniper via chaining, cabling, and/or logging is not necessary, and would not in any way aid restoration of native species or historical stand structures and composition. Trees whose origin pre-date human settlement (beginning around 1880) should not be killed for any reason unless they constitute a hazard (such as falling across a road open to public use). 4. Eradicate exotic species to the degree practicable. Areas open to public motor vehicle use and those that have been heavily and/or persistently grazed by livestock will be the areas most likely to have weeds. Management should be directed to favor establishment and persistence of native plant species over introduced non-natives. The most important weed to eradicate or control is cheatgrass. Native species should be used for reseeding to the maximum degree possible. 5. Consider reducing or eliminating livestock grazing in areas where continuation of it: would further ecologically degrade vegetation, damage soils, damage riparian areas, or hinder active or passive restoration efforts. Grazing must not be allowed in areas with the best representations of native grasses, forbs, and shrubs, i..., those sits with Rank 1 in Shinneman and Baker, 2oo9a. 6. Retain old-growth stands. See discussion above under RESTORATION NEEDS. 7. Do not allow large commercial sales of any products from p-j stands. Light activity, such as fuelwood gathering, is acceptable. Any logging should be confined to areas accessible by or very near existing roads. Logging for any purpose should generally be limited to trees that have established since human settlement, but not all such trees should be cut in anyone stand or area. 8. Restore stands toward historical conditions where possible. This would include reestablishment of native vegetation. Where such vegetation is present, prohibiting activities that tend to harm vegetation, such as livestock grazing, motor vehicle use, and commercial logging, may be sufficient to start achieving restoration of native species. In severely degraded areas, reseeding and/or planting will be necessary. 9. Closely monitor all activities, using appropriate control sites for before and after comparisons. Monitoring is particularly necessary to assess the effectiveness of any restoration efforts. It is also very important after fire, to assess cheatgrass invasion, establishment of native species, and soil stability. 14 See Young and Svejcar, 1999. 15 See Goodrich and Reid, 1999. 16 See Shinneman, 2006.
2826	Ponderosa Pine Ecosystem Ponderosa pine ecosystems in Colorado were shaped by fire. Fires likely burned at

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	variable intervals and intensities, i.e., some fires were low-severity, burning ground vegetation and small trees and maintaining open, park-like tree stands, while others were stand-replacing events. A study of ponderosa pine and mixed conifer stands on the Uncompahgre Plateau found that fire suppression over the last 125 years has likely increased the density of ponderosa pine stands somewhat. See Binkley et al, 2008, but see cautionary note for application on p. 11 of that publication. a. Management Recommendations 1. The Uncompahgre Field Office should inventory its ponderosa pine stands for the following attributes: tree species composition, tree stand structure and density, old growth characteristics (see Mehl, 1992), percent of trees with origin after human settlement, evidence of fire (such as scars on live trees), native versus non-native understory plant composition, and wildlife species' presence. 2. Dense ponderosa pine stands composed primarily of trees of post-settlement origin can be thinned to reduce the threat of an unnaturally hot stand-replacing fire. Generally, only some (not all- see below) of the younger (origin after 1879 ^17), smaller trees should be removed. This would be most appropriate in the lower-elevation ponderosa-dominated stands, as these stands likely had the most frequent fire and thus likely have been changed the most by fire suppression. At the higher elevations of ponderosa pine, stands may have historically been dense at times, and if so, they should have minimal to no thinning. 18 3. Old growth stands must be conserved. A light thinning of young trees may be appropriate in such stands, if post-settlement trees are dense. 4. Fire should be gradually reintroduced into ponderosa-dominated stands, to the extent feasible, over time. To avoid a very hot, stand replacing fire in dense stands that would be outside the range of natural variability, some stands will have to first be thinned. Again, removal should concentrate on smaller diameter trees, particularly those that form fire ladders into the crowns of large, older trees. Also, gambel oak (known as oakbrush) may have to be reduced where it exists with ponderosa pine prior to any burning to avoid post-fire domination of the sites by oakbrush. See Binkley et al, id., at 10. 5. Large Douglas-fir trees should be retained, as they likely existed prior to fire suppression. Some small Douglas-fir should also be retained to ensure retention of conifer trees in case ponderosa pine become infested by bark beetles. Some smaller, younger ponderosa should also be retained for the same purpose. 6. Results of all activity must be monitored. Items to look for include: weed infestation and/or spread, conifer tree regeneration, gambel oak sprouting, effects of any livestock grazing, and ground vegetation response to activities. Control areas will need to be established prior to any activity to allow before and after comparisons. 17 This corresponds to the time of settlement of the area by European descendants, and it is also, according to Binkley et al, Id., the year of a major fire on the Plateau. 18 Binkley et al note that the mixed-conifer forests on the Plateau they sampled appear to be largely within the range of historic variability (HRV). Id. at 9,13. It thus stands to reason that some of the highest elevation stands dominated by ponderosa pine would also be within the HRV.
2827	Spruce-Fir Ecosystem This ecosystem occurs at the higher elevations of forested areas in Colorado, generally above about 9,000 feet. These ecosystems have not been affected by fire suppression, as the fire return interval is in the hundreds of years. Due to the short growing season and harsh conditions, recovery from disturbances, natural and human, takes a very long time. No active management is needed or justified in this ecosystem. The one exception might be after a large, stand-replacement fire, where soil stabilization might be needed in a few areas to help conserve water quality.
	Vegetation- Noxious Weeds
2795	The RMP revision must address noxious weeds and propose mitigation strategies. Noxious weeds are a real threat throughout the West, and this is especially true in areas that may become infested with cheatgrass, and in places where soils are actively being disturbed. The BLM must limit surface disturbance whenever possible and implement Integrated Pest Management strategies in conjunction with all surface-disturbing activities in order to contain noxious weeds. The agency must monitor the efficacy of noxious weed containment after surface disturbance, and use the results of the monitoring to both provide realistic analyses of the effects of disturbance in planning for future projects, and to design projects that are more resistant to noxious weed proliferation. RMP revision should seriously address this threat.
59	Non-native weeds have transformed important habitat to much less productive habitat. This serious problem deserves more attention.
38	No reasonable expense should be spared in combating non-native weeds. Priority should be given to those which totally transform landscapes and habitat, such as cheatgrass and tamarisks.
39	Weed control should use the best available science, and is a good place to mention adaptive management, rather than detail how to do it in the RMP.
55	Non-native weeds are especially important in riparian areas and semi-desert shrub habitat. Rocky Mountain Bird

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	Observatory studies being done for the Tamarisk Coalition on the Colorado Plateau Rivers show that /all/ bird species are less common when tamarisk make up most of the understory. Literature that indicates tamarisk may not be quite as bad may be comparing them to no understory, rather than to native shrubs. Any management activity that affects native vegetation seems to affect some wildlife species.
597	Weed management is important.
821	Aggressively control weeds, especially Russian knapweed, cheatgrass and tamarisk.
852	The BLM's use of herbicides. As a licensed wildlife rehabilitator for the CO Div. of Wildlife (CDOW) and US Fish and Wildlife Service (USFWS) I have personally cared for poisoned wildlife. The majority that have been poisoned are raptors and songbirds, but raccoons, cottontails, mice, mink, waterfowl, deer, elk, amphibians, reptiles, beneficial insects, and many others can all be poisoned by herbicides. These creatures come in extremely ill, they smell, have abnormal feces, vomiting, dehydrated. It is rare that one can be saved. Herbicides also kill insects= food for many creatures. Because of my direct experience in dealing with the consequences of poisons, I am not in favor of the massive use of herbicides, pesticides or chemical fertilizers on public or private lands.
854	Beneficial Bugs can also be used to control noxious weeds. They have already been proven useful on tamarisk and knapweed. There are 3 weevils that are known to help control knapweed.
855	As much as possible, BLM should use PRISON workers to manually pull or mow weeds. Using prison labor is positive for them. It puts our tax dollars to work. It spares the environment and wildlife the severe consequences of using herbicides. Prison labor can dig, cut or pull cocklebur, burdock, oxeye daisy and others.
856	I have been very successful on our ranch and grazing allotments (except for Marsh reservoirs 1 & 2) hand pulling cocklebur (annual) and cutting burdock down in its second year (biennial) around all ponds. Cattle will graze the tops off knapweed in flowering stage. I would also like to see the use of goats to selectively graze weeds. There are several people in the Montrose area who already move their goats to different pastures needing weed management, just for the purpose of having pasture to feed them. Some people hire the herd out. Americorps also does weed abatement projects.
858	Selective burning also works on some weeds, such as cocklebur in ponds. * (My comments here also apply to section 6.2 "Managing for Livestock and Against Weeds")
1042	I always like to end my emails to the BLM with the friendly reminder that removing cattle from public lands will not affect the price of cattle by 1 cent in our grocery stores and that the noxious weeds are spreading at a rate of 5,000 acres per day.
1172	EPA supports the goal of preventing the introduction and spread of invasive plants and noxious weeds. Among the greatest threats to biodiversity is the spread of noxious weeds and exotic (non-indigenous) plants. Many noxious weeds can out-compete native plants and produce a mono culture that has little or no plant species diversity or benefit to wildlife. Noxious weeds tend to gain a foothold where there is disturbance in the ecosystem. Oil and gas development activities, grazing, and off highway vehicle (OHV) use can cause such a disturbance. While we support integrated weed management, including the effective mix of education and prevention with biological, mechanical, and chemical management, we encourage prioritization of management techniques that focus on non-chemical treatments first. Reliance on herbicides should be a last resort. Early recognition and control of new infestations is essential to stopping the spread of infestation and avoiding future widespread use of herbicides, which could correspondingly have more adverse impacts on biodiversity and nearby water quality. There are a number of prevention measures available, such as reseeding disturbed areas as soon as possible and cleaning equipment and tires prior to transportation to an un-infested area. The RMP/EIS should list the noxious weeds and exotic plants that occur in the resource area. In cases where noxious weeds are a threat, EPA recommends the document detail a strategy for prevention, early detection of invasion, and control procedures for each species.
1191	Specific to the Community Assessment, we would like to emphasize the Partnership Opportunities that have been articulated. The Assessment provides the following: * Most groups would like municipal and county governments, community residents, and organizations and clubs to cooperate with BLM on trail planning (including the route designation process) and maintenance, as well as on noxious weeds management. * Some groups would like municipal governments and community residents to work with BLM on improving access from towns to BLM public lands. These are indeed points raised and supported by the Town of Ridgway.

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1698	The RMP should prohibit aerial spraying of pesticides and toxicants on public land. Avoid application of herbicides to broad areas (>80 acre patches) in any single season.
1701	I am particularly concerned about gas development and pesticide use on public lands. I live in Oregon, but I use natural gas in my home, and we are being told that we don't liquefied natural gas terminals on the Columbia River (I agree with this!) because our gas can come from the Rockies! However, I'm aware that gas drilling in that area comes with huge potential costs, including water pollution. Although gas is relatively clean burning, the other costs to drilling are often not paid attention to. BLM lands are public lands, therefore I request that they be managed in a way that preserves them as much as possible in their natural state and that minimizes effects on climate change.
1708	Please strongly consider alternatives to aerial spraying.
2245	Areas with infestations of weeds should not be burned or mechanically treated until pretreatments have been done to prevent further infestations during or after the treatment.
2246	The RMP should prohibit aerial spraying of pesticides and toxicants on public land.
2247	Avoid application of herbicides to broad areas (>80 acre patches) in any single season
2248	If APHIS becomes involved in pest control on adjoining private lands, the UFO's default/starting position for pest control on public lands should be "No Aerial Spray," regardless of whether APHIS has met NEPA requirements.
2249	Areas that should be left untreated include those that are far from roads, have minimal human and/or grazing intrusion, and have high vegetation diversity and populations of sensitive plants/animals. (See CNHP database to assist in identifying such areas).
2251	Weed and pest control terms should be defined in the RMP, including the following: Pesticides are chemicals used to control undesirable arthropods; toxicants are chemicals used to control troublesome vertebrates; herbicides are chemicals used to control weeds and/or to adjust the relative competitive advantage of various plants on a site. BLM has some good rules about the use of herbicides, which are not as dangerous as pesticides and toxicants. Nonetheless, the UFO should use herbicides as a last resort when other management options will not suffice.
2256	Grazing permitees and recreational users should be taught to identify problem weed areas so they can be control before weeds spread. Contact local recreation and environmental groups to solicit volunteers for weed identification and inventory.
	Wetlands and Riparian Areas
1125	Based on the general information available for review, our initial areas of concern for this upcoming resource management plan include impacts to air quality from energy development, impacts to wetlands, and protection of water resources. We are also concerned with the potential cumulative effects of the increased energy development in the region. Along with identifying direct impacts, the EIS should include a rigorous analysis of indirect and cumulative impacts. The EIS should disclose the impacts of all reasonably foreseeable actions on environmental resources in a way for decision-makers and any participating counties/municipalities to be able to effectively plan to reduce impacts on such resources as much as possible.
1132	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 wetlands and riparian areas of Wilderness Study Areas (WSAs), Areas of Critical Environmental Concern (ACECs), and areas under consideration for Wild and Scenic Rivers designation. We suggest that lease stipulations to protect wetlands be strongly considered.
1134	EPA recognizes the challenges facing BLM in analyzing, understanding, and ultimately managing wetland resources in such a large planning area. However, the RMP/EIS should describe specifically how wetlands will be identified, avoided, or ultimately mitigated at the project-specific level
1162	EPA considers the protection, improvement, and restoration of wetlands and riparian areas to be a high priority. Wetlands increase landscape and species diversity and are critical to the protection of designated water uses. Possible impacts on wetlands include damage or improvement to water quality, habitat for aquatic and terrestrial life, channel and bank stability, flood storage, groundwater recharge and discharge, sources of primary production, and recreation and aesthetics. Road and pipeline construction, grazing, land clearing, and

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	earthwork generally include sedimentation and hydraulic impacts which at some level may cause changes to surface and subsurface drainage patterns and, ultimately, wetland integrity and function. Riparian habitats, similar to wetlands, are important ecological areas supporting many species of western wildlife. Riparian areas generally lack the amount or duration of water usually present in wetlands, yet are "wetter" than adjacent uplands. Riparian areas increase landscape and species diversity, and are often critical to the protection of water quality and beneficial uses.
1163	EPA encourages BLM to identify wetlands in the resource management planning area and to plan for appropriate mitigation. We suggest BLM require delineation and marking of perennial seeps, springs and wetlands on maps and on the ground before any activity occurs, so efforts may be made to protect them. We also recommend establishment of wetland and riparian habitat 100-foot buffer zones to avoid adverse impacts to streams, wetlands, and riparian areas. Due to the time it can take to adequately reclaim some disturbed wetlands, EPA suggests that BLM require mitigation of wetland disturbance during the project operating time, and that mitigation for any particular wetland or riparian area begin concurrent with the disturbance, or even prior to project construction, if possible. As studies indicate that traditional mitigation is generally not successful in fully restoring wetland function, BLM should require a minimum of two-to-one mitigation of wetland disturbance. The EIS should specify general mitigation requirements, and require any specific projects to generate a wetland mitigation plan.
1164	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 wetlands and riparian areas of Wilderness Study Areas (WSAs), Areas of Critical Environmental Concern (ACECs), and areas under consideration for Wild and Scenic Rivers designation. We suggest that lease stipulations to protect wetlands be strongly considered. In addition, 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.
1165	EPA recognizes the challenges facing BLM in analyzing, understanding, and ultimately managing wetland resources in such a large planning area. However, 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/federal minerals. In order to illustrate effects to wetlands in the area, the EIS should specifically include the following analyses or descriptions: • Clear maps, including wetland delineation and regional water features; • Wetland delineation and descriptions including wetlands function analysis if there is any potential that the project will cause impacts; • Detailed analysis of the direct, indirect and cumulative impacts to all wetlands in the system [immediate, directly impacted, or potentially hydrologically impacted but spatially removed from the actual construction footprint (EO 11990, Protection of Wetlands)]. This analysis should also include the cumulative impacts to wetlands from future development scenarios based on population and growth estimates; and • Potentially adverse impacts to aquatic resources from reasonably foreseeable development should be analyzed.
2110	Rock Creek/Carpenter Flats North of Saucer Basin is a steep southern wall of Rock Creek Canyon that appears to be roadless and worthy of study. Deep canyons and tributaries like these are epicenters of biodiversity on this exposed landscape harboring a rich diversity of birds including cliff-dwelling raptors and unique plant and riparian communities. Regarding biodiversity in western states one estimate is that 98% is found in riparian corridors.
2369	Don't destroy those wetlands. Keep them preserved and protected.
2611	The riparian goal of PFC is totally inadequate because PFC is only a minimal hydrologic evaluation, is highly subjective and biased. PFC does not address habitat or water quality. Regarding stubble height standards, they are ineffective because they are typically not enforced, do not represent use in riparian areas and little strips of sedges do not filter sediment. For filtering sediment, intact riparian areas with vegetated stream banks and fully vegetated riparian areas are needed to reduce erosion and filter sediment. These deficiencies should be addressed by closing all riparian areas to livestock.
2643	In particular, the Dolores River Valley offers some of the most pristine riparian resources in the entire

Table C-8
Issue 1: Vegetation

Comment ID	Comment
	Uncompahgre Plateau.

Table C-9
Issue 1: Special Status Species

Comment ID	Comment
2792	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 Uncompahgre 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: State Directors, usually in cooperation with state wildlife agencies, may designate sensitive species. By definition, the sensitive species designation includes species that could easily become endangered or extinct within a state. Therefore, if sensitive species are designated by a State Director, the protection provided by the policy for candidate species shall be used as the minimum level of protection. Therefore, the BLM must provide Sensitive species with a minimum of candidate-level protection. Candidate species were to be managed as follows: BLM shall carry out management, consistent with the principles of multiple use, for the conservation of candidate species and their habitats and shall ensure that actions authorized, funded, or carried out do not contribute to the need to list any of these species as threatened/endangered. Specifically, BLM shall: Determine the distribution, abundance, reasons for the current status, and habitat needs for candidate species occurring on lands administered by BLM, and evaluate the significance of lands administered by BLM or actions in maintaining those species. For those species where lands administered by BLM or actions have a significant effect on their status, manage the habitat to conserve the species by: - Including candidate species as priority species in land use plans. - Developing and implementing rangewide and/or site-specific management plans for candidate species that include specific habitat and population management objectives designed for recovery, as well as the management strategies necessary to meet those objectives. - Ensuring that BLM activities affecting the habitat of candidate species are carried out in a manner that is consistent with the objectives for those species. - Monitoring populations and habitats of candidate species to determine whether management objectives are being met. Request technical assistance from FWS/NMFS, and any other qualified source, on any planned action that may contribute to the need to list a candidate species as threatened/endangered. BLM Manual 6840.06.C During the 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. The BLM has special duties toward special status species when conducting land use planning. First, BLM must "identify watersheds that may need special protection from the standpoint of human health concerns, aquatic ecosystem health, or other public uses." BLM Land Use Planning Handbook H-1601-1, Appendix Cat 2. For riparian areas within these watersheds, BLM must also identify desired width/depth ratios, streambank conditions, channel substrate conditions, and large woody material characteristics." /d. Second, BLM must "designate priority plant species and habitats, including Special Status Species and populations of plant species recognized as significant for at least one factor such as density, diversity, size, public interest, remnant character, or age." BLM Land Use Planning Handbook H1601-1, Appendix Cat 3. Finally, BLM must "designate priority species and habitats, including Special Status Species, and populations of fish or wildlife species recognized as significant for at least one factor such as density, diversity, size, public interest, remnant character, or age./1 BLM Land Use Planning Handbook H-1601-1, Appendix Cat 7. BLM must also identify the measures necessary for protecting each of these priority areas and species: For priority watersheds and riparian areas, Identify measures, including filing for water rights under state permit procedures, to ensure water availability for multiple use management and functioning, healthy riparian and upland systems. BLM Land Use Planning Handbook H-1601-1, Appendix Cat 2. For priority plant species and habitats, Identify the actions and area-wide use restrictions needed to achieve desired vegetative conditions." BLM Land Use Planning Handbook H-1601-1, Appendix Cat 3. For priority populations, species, or habitats of fish and wildlife, Identify actions and area-wide use restrictions needed to achieve desired population and habitat conditions while maintaining a thriving natural ecological balance and multiple-use relationships." BLM Land Use Planning Handbook H-1601-1, Appendix Cat 7. Also, BLM must Identify site-specific actions, such as riparian fencing, guzzler placement, etc., needed to manage ecosystems for all species and habitat for special status species. BLM land Use Planning Handbook H-1601-1, Appendix Cat 7. Additionally, BLM must: Identify strategies and decisions to conserve and recover special status species. Given the legal mandate to conserve threatened or endangered species and BLM's policy to conserve all Special Status Species, land use planning strategies and decision should result in a reasonable conservation strategy for these species. Land use plan decisions should be clear and sufficiently detailed to enhance habitat or prevent avoidable loss of habitat pending the development and implementation of implementation-level plans. This may include identifying stipulations or criteria that would be applied to implementation actions. Land use plan decisions should be consistent with BLM's mandate to recover listed species and should be consistent with objectives and recommended actions in approved recovery plans, conservation agreements and strategies, MOUs, and applicable biological opinions for threatened and endangered species. BLM Land Use Planning Handbook H-

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	1601-1, Appendix Cat 5. The BLM Manual's definition of a "Conservation Strategy states: A strategy outlining current activities or threats that are contributing to the decline of a species, along with the actions or strategies needed to reverse or eliminate such a decline or threat. Conservation strategies are generally developed for species of plants and animals that are designated as BLM Sensitive species or that have been determined by the Fish and Wildlife Service or National Marine Fisheries Service to be Federal candidates under the Endangered Species Act. BLM Manual § 1601, Glossary at 2.
41	The Prep Plan choices of Gunnison Sage-Grouse, Gunnison's and white-tailed prairie dogs, and clay-loving buckwheat are good choices.
42	If one more [Special Status Species] were added, Yellow-Billed Cuckoo would be a good choice, especially since it represents a different, important habitat.
43	Burrowing Owl, (wintering) Feruginous Hawk, Golden Eagle, long-nosed leopard lizard, and kit fox could be preserved by good conservation of the two prairie dog species' habitats.
45	DO would be increase in occupied habitat area and quality of habitat, increase in population of GUSG, increase in connectivity between populations (between the San Miguel Basin population and the Pinon Mesa, Cerro, and Monticello populations, for example) and increased potential for use by GSUG of historic habitat areas that may not be used now. Strategies include reversing permanent loss of habitat trends on private land through conservation easements or fee acquisitions, reducing fragmentation of occupied, potential, and historically used sage habitat by strict travel management policies and by not allowing O&G development, and reducing or eliminating antler hunting in occupied habitat. Quality of habitat should be improved using best science regarding, increase of forbs, reduction of PJs, and protecting wet areas. (Recommendations on connectivity using historic habitat, oil and gas development, and habitat vegetation are addressed in the /San Miguel Basin GUSG Working Group Conservation Plan/ from 2010.) New transmission or other utility lines should not be allowed in Priority Habitats or Special Status Species habitats, but GUSG are probably the most sensitive of any species to them.
47	DO for Yellow-Billed Cuckoo would be protection of all riparian areas that are capable of supporting any cottonwood species, and increasing the low population of cuckoos. This would require eliminating tamarisks and Russian knapweed, (and replacing them with native species), encouraging regeneration of cottonwoods, and maintaining large areas of large shrubs beneath and adjacent to the cottonwoods. This would also benefit countless other species of birds, bats and other wildlife. Willows may not affect cuckoos but are critical for other species.
551	The BLM should have an active habitat management program that is focused on landscapes that provide healthy, diverse, native vegetation and protection of key/critical plant/wildlife habitats from the impacts of vehicles, OHV's, mineral exploration and development, recreation activities, or livestock grazing.
876	Managing Special Status Plant and Wildlife Species: The BLM needs to work closely with CDOW and USFWS and ranchers on wildlife. People doing weed eradication, erosion work, etc. are probably also noticing the wildlife habitat while they're working. Maybe they could keep a daily log of what they see while they're out and about. We ranchers are outside all the time, and many of us notice what's going in certain areas with wildlife and plant life, erosion, etc.
1169	EPA recommends engaging the Fish and Wildlife Service as early in the analysis as possible, in order to assure that the proposed alternatives responsibly account for, or are in compliance with, the following: • Endangered Species Act; • Habitat fragmentation regarding species' habitat requirements; • Migratory Bird Treaty Act; and • Special status species management.
1203	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. In order to address this issue, we recommend that the UFO 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 UFO, many of which are primarily dependent on UFO BLM property for survival.
1290	We provide water to the guzzlers for the Gunnison Sage Grouse and the pipeline provides water to all wildlife

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	in the area. We have a deferred rotation in place that is consistently monitored to meet objectives. We have participated in treatment projects to benefit the habitat for not only the Gunnison Sage Grouse but big game also. All of this has been done in concert with a multiple use resource plan that acknowledges the livestock industry in the Uncompahgre area boundaries.
1295	The RMP should be written in a manner that allows for flexibility and adaptive management to determine what happens on the ground. Too many times, plans are written that are rigid, and do not allow changes to be made and this opens up the UFO to even more litigation. Specifically, new research is being published regarding the Gunnison Sage Grouse (GSG). To write the RMP with rigid guidelines regarding the GSG would not allow changes to be made on the ground that may benefit the grouse.
1297	The Green Mountain allotment is home to the Crawford population of the GSG. Monitoring results indicate that the GSG vegetation guidelines are being met under our deferred rotation plan for cattle grazing. Additional permit reductions are not needed to meet guidelines. We are active members of the Crawford Sage Grouse Working Group and have been since the inception. The RMP should be written to acknowledge that livestock grazing is being managed in GSG habitats and objectives are still being met.
2183	Our members value intact natural ecosystems that maintain their pre-Columbian constituent species in natural abundances. Protected natural ecosystems on public lands are the last refuges of many threatened, endangered, and dwindling species. These ecosystems provide valuable natural resources and ecosystem services, such as water collection and purification systems and carbon sinks that protect against global warming. For the communities in and nearby the UFO, they are the basis of a renewable, vibrant recreation economy.
2233	Sensitive Plant and Animal Species The UFO should strive to identify new special status plant or wildlife areas or species needing special protection or likely to need special protection in the future. The UFO should be proactive in establishing ACECs for such areas and/or species likely to be threatened in the future. ACECs could be designated for all sensitive sites in the UFO area. Special status species include Gunnison Prairie Dog, Gunnison Sage Grouse, Uinta Basin Hookless Cactus, and Yellow-billed Cuckoo
44	DO would be increased in area occupied by large PD towns and in numbers of prairie dogs and their associated species. An increase in Burrowing Owls is especially desirable. Actions could include motorized travel restrictions, O&G surface occupancy stipulations, shooting restrictions in prairie dog habitat, and veg management actions, especially weed (cheatgrass) control, and occasionally, large shrub removal. The BLM should realize that they must assume responsibility for the survival of all of the PD dependent species.
552	The BLM needs to utilize the best available science in developing management standards and guidelines for TES species. In the case of the Gunnison sage grouse, I would like to see the UFO adopt the management guidelines in the Statewide GSG conservation plan in to the RMP so that subsequent grazing, minerals, and OHV decisions will further incorporate and implement these comprehensive management practices. The RMP should include policy to resolve cases of conflict with TES species in favor of special status species. Uncertain impacts should conserve TES species and their habitats rather than cause irretrievable losses.
688	San Miguel County has been actively involved in conservation efforts for Gunnison Sage Grouse for over 13 years. The Norwood LHA states (pg 35) "These lek counts indicate the trend for the overall population appears stable through this time frame (1992-2005). However, it is believed that the current population is much lower than in historic times". This conclusion needs to be updated as since this time, Gunnison Sage Grouse populations have plummeted. A new listing decision may result in protection for the Gunnison Sage Grouse under the endangered Species Act.
1184	This parcel [shown in map] appears to be mapped Gunnison sage grouse habitat. Our recommendation would be to discuss this parcel with CDOW biologist Jim Gamer. The parcel could be conveyed to CDOW or the Forest Service for Gunnison sage-grouse habitat or as a buffer to habitat.
2236	Gunnison Sage Grouse. The UFO should incorporate the management guidelines in the statewide Gunnison Sage Grouse Conservation Plan into the RMP so that subsequent grazing, mineral extraction, and travel management decisions will be based on these guidelines. The UFO should manage to increase occupied habitat area and quality of habitat, increase population sizes, increase connectivity between populations (between the San Miguel Basin population and the Pinon Mesa, Cerro, and Monticello populations, for example) and increase potential for Gunnison Sage Grouse to reoccupy historic habitat that is not used now. Strategies include reversing permanent loss of habitat trends on private land through conservation easements or fee acquisitions, reducing fragmentation of occupied, potential, and historically used sage habitat by strict travel management

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	policies and by not allowing oil and gas development, and by reducing or eliminating antler collecting in occupied habitat. Quality of habitat should be improved using best science regarding increase of forbs, reduction of PJs, and protecting wet areas. (Recommendations on connectivity using historic habitat, oil and gas development, and habitat vegetation are addressed in the San Miguel Basin GUSG Working Group Conservation Plan from 2010.) New transmission or other utility lines should not be allowed in Priority Habitats or Special Status Species habitats, but GUSG are probably the most sensitive of nearly any species to them.
2516	I urge you to make the protection of threatened and endangered species the highest priority and identify critical habitat to protect and a plan to ensure their survival
2679	Thank you for the opportunity to comment on the Uncompahgre RMP revision. The Uncompahgre Field Office encompasses some of Colorado's most beloved wilderness-quality lands, wild rivers, and opportunities for quiet, backcountry recreation. The resource area is also home to important and imperiled wildlife, such as Gunnison sage grouse, that rely on large intact tracts of habitat free from roads and other infrastructure. Although the grouse was not added to the ESA list it was noted as a species of concern, thus its preservation, and thus preservation of the wild character of the habitat it requires should still be an item of BLM management planning.
254	Threatened or endangered Colorado River fish- Reclamation is actively involved in the recovery of endemic fishes in the Colorado River Basin. A programmatic biological opinion has been prepared by the Fish and Wildlife Service that addresses operations of the Wayne N. Aspinall Unit as well as all water depletions in the Gunnison Basin, including depletions of BLM projects and BLM permitted projects. This opinion calls for a selenium management program to reduce selenium concentrations in the Gunnison and Colorado rivers. BLM actions, including land disposals and changes in land use, can have significant effects on selenium loading and this must be addressed in the RMP planning.
2156	River systems within the UFO contain populations (including conservation populations) of the Colorado River cutthroat trout (CRCT). This species has declined in that last century and now occupies less than 14% of its historic habitat and only 8% of the historic habitat range is occupied by unhybridized or ecologically significant populations (CRCT Coordination Team. 2006. Conservation Strategy for Colorado River cutthroat trout (Oncorhynchus clarkii pleuriticus) in the states of Colorado, Utah and Wyoming. Colorado Division of Wildlife, Ft. Collins. 24 pp.: Young, M.K. 2008. Colorado River cutthroat trout: a technical conservation assessment. General Technical Report RMRS-GTR · 207-WWW. USDA Forest Service, Rocky Mountain Research Station, Ft. Collins, Colorado.). The CRCT Conservation Strategy is very specific in its (illegible) to manage for the conservation of this species. Strategy 7 under Physical Conservation Activities states: Manage entire watersheds: Impacts outside the riparian zone should be considered as part of CRCT management. Land management agencies should work to mitigate adverse impacts of watershed activities on water quality, instream habitat, channel morphology, riparian areas, and population stability (CRCT Conservation Strategy, page 18). While No Surface Occupancy (NSO) stipulations within a set distance of a stream occupied by cutthroat trout or a stream suitable for reintroduction are a good sta1t, a "setback" stipulation is limiting in its accountability toward stream integrity. A stream is only as good as the integrity of its watershed, from ridge-top to ridge top. By only protecting streamside (illegible), we fail to acknowledge that upland land uses - along with surface disturbances along tributary streams - can have serious negative impacts to water quality and in turn aquatic biota in larger, trout bearing streams. The Beaverhead-Deerlodge National Forest (BHDLNF) in Montana recognized this reality and recently adopted a watershed management approach in its 2009 Revised Forest Plan Revised (Beaverhead-Deerlodge Revised Land and Resource Management Plan, January, 2009). In doing so, the BHDLNF implemented for all Key Watersheds' with cutthroat trout, an NSO stipulation that covers the entire drainage. For watersheds containing conservation populations of cutthroat trout outside of Key Watersheds. the BHDLNF put in place a CSU stipulation that requires no net sediment increase over existing conditions.
2158	TU stresses the need to protect both existing and potential CRCT habitat. In order to ensure the long term viability of CRCT, it is critical that state wildlife agencies, federal land management agencies, anglers and concerned citizens do not accept the current status of CRCT as "good enough". Recovery of this species requires that it is reintroduced into suitable habitat within the historic range of CRCT. In order to maximize reintroduction opportunities, it is important to ensure that streams meet the habitat requirements of CRCT and that water quality impacts do not occur that would forsake opportunities to re-introduce CRCT. As noted above, the CRCT Conservation Strategy states that "Land management agencies agree to protect existing and potential cutthroat trout waters from adverse effects of other land uses." (Emphasis added) It is important to note that "potential habitat" is not synonymous with "historic habitat". In 2005, the CRCT Conservation Team

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	developed the Range-wide Status of CRCT2 ; the CRCT Conservation Team is the body charged with administering the CRCT Agreement. In Range-wide Stanis, the CRCT Conservation Team assessed restoration and expansion opportunities in unoccupied historic habitat based on four attributes: 1.) past stocking of nonnative trout that would genetically contaminate CRCT; 2.) relative quality of habitat; 3.) Significance of existing fisheries Within the suitable stream segments; and 4.) relative complexity of removal of non-native fish present within the stream segment. Based upon these attributes and considerations, the CRCT Conservation Team evaluated currently unoccupied "historic habitat" and determined "suitable habitat" (Le., stream segments that are suitable for reintroduction of CRCT). TU's information is summarized on pages 53-54 of the Range-wide Status. Using data from the Range Wide Status, TU has mapped this information and Figures 1 and 2 in the Appendix C of our scoping comments shows stream segments currently occupied by conservation populations, historic habitat, and suitable habitat. As these maps show, lands or lands over minerals managed by the UFO only contain a few conservation populations of CRCT, but there are many miles of streams that are suitable for CRCT reintroductions. The Planning Team should ensure that the RMP revision takes into account the need to not only protect existing populations of CRCT, but also protect potential habitat that is suitable for the reintroduction of CRCT. This is a critical element of the CRCT Conservation Agreement and Strategy. The UFO can ensure that it is protecting suitable habitat for CRCT by restricting activities that would degrade the quality of these habitats so as to ensure that future cutthroat reintroduction efforts are not compromised. Several supportive examples of management actions that have been implemented to protect potential native trout habitat are provided here. In April 2009 the Butte BLM Field Office in Montana issued an RMP Record of Decision that requires half-mile NSO stipulations for streams with cutthroat trout of 90% or higher genetic purity and a half-mile mile NSO would also be applied for streams with the potential for restoration of cutthroat trout. Additionally, in April of 2009, the BLM's Fillmore Field Office in Utah issued a Decision Record for an Environmental Assessment that specifically excluded leasing in cutthroat trout occupied habitat and historical habitat because they had not analyzed the impacts of oil and gas leasing on reintroduction opportunities for cutthroat trout.
2169	Special Status Species: CRCT arc native to streams and rivers in the UFO. The state of Colorado has identified the CRCT as a Species of Concern and the BLM has identified the CRCT as a Sensitive Species. Both these status rankings accentuate the importance of this species and they should be included as a Special Status Species in the UFO RMP revision. Conservation and restoration efforts to reduce and eliminate threats that could lead to listing under the Endangered Species Act are being implemented under the Conservation Agreement for Colorado River Cutthroat Trout in Utah, Colorado, and Wyoming (June 2006). Colorado BLM is a signatory of this agreement and a partner in the associated strategy. On page 12 of the Preparation Plan for the UFO, there are several questions listed relative to Special Status Species. With regard to CRCT, most of these questions can be answered by reviewing the CRCT Conservation Strategy and Agreement Despite commitments made by BLM in the CRCT Conservation Agreement and Strategy, the Preparation Plan for the UFO RMP docs not discuss CRCT in Issue I , Part D (Special Status Species) or Pan E (Fish and Wildlife). Additionally, the Preliminary Planning Criteria section of the Preparation Plan does not list the CRCT Conservation Agreement or Strategy as a planning criterion. TU feels that this is a critical omission. The Preparation Plan states that Planning Criteria arc: "constraints or ground rules that are developed to guide and direct the development of the plan and determine bow the planning team approaches the development of alternatives and ultimately, selection of a Preferred Alternative." Given commitments made in the CRCT Conservation Agreement, and due to the presence of CRCT habitat and potential habitat4 that could be affected by decisions made in the RMP revision, TU strongly encourages the Planning Team. to include the CRCT Conservation Agreement as a Planning Criteria under the Plan
2170	Fish and Wildlife (Including Migratory Birds): The Preparation Plan for the UFO RMP does not discuss CRCT in Issue I, Part E (Fish and Wildlife). Additionally, the Preliminary Planning Criteria section of the Preparation Plan does not list the CRCT Conservation Agreement or Strategy as a planning criteria.
2790	Special Status Species/Plants This section includes recommendations for managing special status species to best protect viable populations and habitats while still adequately managing the other resources in the Uncompahgre Field Office. 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 preservation of rare and imperiled species, and the habitat and movement corridors necessary to sustain healthy populations of such species, an explicit goal of the revised RMP. We ask that this goal be clearly reflected in the objectives and standards set forth by the new plan. BLM should identify crucial habitat, including

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	movement corridors, necessary to sustain healthy populations of all of the rare and imperiled species present in the Uncompahgre Field Office. Additionally, 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, the RMP should avoid making habitat for rare and imperiled species available 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.
2800	Rare Plant Habitat - The BLM is a partner of the Center for Native Ecosystems in the Colorado Rare Plant Initiative, which recently finalized a set of best management practices for oil and gas drilling in rare plant habitat. Those BMPs can be accessed at http://conserveonline.org/workspaces/corareplantinitiative!documents/recommended-bestmanagement-practices-for-plants!view.html. We also encourage the BLM to adopt the following prescriptions in ACECs designated because of their rare plant values, and to consider applying these in other rare plant habitats as well: 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. Site Inventories: • 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. Monitoring: • 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. Project design: • 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. • Ensure that water extraction or disposal practices do not result in change of surface or subsurface hydrologic regime. • Limit disturbances to and within suitable habitat by staying on designated routes

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	• 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. • Place signing to limit motorized travel in sensitive areas. • Require implementation of dust abatement practices near occupied rare plant/lichen habitat. • 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. • 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). • 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. • 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. • Restrict the total area of each pad to the least amount of acreage required to drill the wells planned for that pad. • Close and reclaim roads as soon as they are no longer needed, and gate them to prevent unauthorized use. • Use busing or van transportation of crews and remote monitoring of wells to minimize truck traffic and associated dust. • Identify rare plant pollinators, and develop mitigation and minimization measures that provide adequate protection to pollinator species. • Conduct routine site visits for permit compliance, set timelines for fixing permit violations, and issue fines for not meeting requirements. • 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. Other ground-disturbing activities: • Apply a No Ground Disturbance restriction to the entire ACEC with specific authorization for an exception only for management activities that are necessary to conserve the ecological integrity of the ACEC and that further conservation goals for the values for which the ACEC was designated. For example, an exception could be made for construction of fencing/exclosures when needed to further rare plant conservation goals. • Designate the entire ACEC as a right-of-way Exclusion Area. Non-fluid mineral development: • Withdraw the ACEC from mineral entry. • Apply the No Ground Disturbance restriction discussed above to existing non-fluid mineral leases. Travel management: • limit use of roads to designated routes. • Close routes that affect important habitat for these rare plants/lichens in order to limit dust, invasion of habitat by noxious weeds, and illegal off-road vehicle (ORV) use. • Close the entire ACEC to ORV use. Non-motorized recreation: • Encourage those engaging in non-motorized recreation to use designated roads and trails, and to avoid important habitat for these rare plants. • Prohibit overnight camping and campfires within 300 feet of rare plant/lichen populations.

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	Grazing: • Retire grazing allotments within the ACEC whenever possible • Prohibit treatments designed to increase forage for livestock, including seeding and irrigation. • If trampling by livestock is identified as a concern where grazing allotments exist, create cattle exclosures around rare plant/lichen populations, and include a 300 foot buffer within the exclosure to minimize indirect effects of grazing on rare plant populations. • Manage livestock grazing within occupied or potential habitat for rare plants/lichens to promote plant health, maintain sufficient residual vegetation, minimize potential for trampling, minimize potential for invasion of non-native plant species, and sustain overall watershed functions. Lands and realty: • Work towards acquisition of private inholdings. • Apply right-of-way exclusion to entire ACEC. • Establish memorandums of understanding with willing landowners to encourage private land management actions that enhance protection of ACEC values on and adjacent to private inholdings (e.g., control of noxious weeds). Management of noxious weeds: • Promote natural processes and healthy native plant/lichen communities to deter noxious weeds. • Minimize fragmentation of habitat and associated risk of invasion by noxious weeds and other aggressive non-native species. • Develop an integrated weed management program that emphasizes prevention, inventory, detection and monitoring, and includes control techniques (e.g., mechanical and hand-applied herbicides) that will not damage rare plant/lichen species, or other non-target species. • Where practicable, eliminate any existing human-caused disturbance that is contributing to the spread of noxious weeds. • Continue and expand public education. Other: • Prohibit collection of plants, plant materials and seeds, except for scientific or research purposes. Such collection must have no detrimental impact on long-term survival and reproduction of rare species or significant communities. • Where practicable, restore to a naturally functioning state any existing human-caused disturbance that is impairing natural ecosystem processes affecting habitat for rare plant species or significant plant communities. • Cooperate with the Colorado Natural Heritage Program to develop and carry out a plan to inventory and monitor plant/lichen species, unique natural communities, and to monitor the overall ecological integrity of the ACEC. • Cooperate with the Colorado Natural Heritage Program and other entities to allow for and facilitate additional research on rare and imperiled species and unique natural communities. • If monitoring identifies new threats or suggests that the management recommended above is not adequately protecting rare plant/lichen populations and/or unique natural communities from significant negative impacts (including indirect or cumulative impacts), take appropriate action to prevent such negative impacts. d. Rare and Imperiled Species and Watchable Wildlife in the Planning Area The Center for Native Ecosystems is submitting detailed comments regarding rare and imperiled species, big game and watchable wildlife in the Uncompahgre planning area that would benefit from ACEC designations and/or special management. We herein reference and support those comments.
46	All clay-loving buckwheat populations should have total protection from any damaging uses, especially travel.
255	Rare Plants- Some of the known rare plant areas coincide with Reclamation lands and/or facilities.
1204	Of particular note is the habitat protection of the federally-endangered *Eriogonum pelinophilum* in and around the Fairview South Natural Area/ACEC. Inspection of recent surveys for *E. pelinophilum* around the Fairview South ACEC that have occurred since the last RMP was adopted show that the current boundary of the ACEC does not contain all identified sub-occurrences of the listed plant on BLM land in this area. CNAP recommends

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Comment ID	Comment
	that the ACEC boundaries be extended to the east and south to provide protection for these additional occurrences, and to allow for more comprehensive conservation planning for what may be the most significant population of this species in the world. The Colorado Natural Areas Program owns and cooperatively manages the Wacker Ranch Natural Area, which was purchased to protect the listed species and is directly adjacent to the Fairview South ACEC. We have a direct interest in providing special management considerations to the whole 'Fairview' population of *E. pelinophilum*, and expansion of the ACEC to encompass the whole population on BLM land would be a great stride in providing more comprehensive protection for this irreplaceable rare plant habitat.

Table C-10
Issue 1: Special Designation Areas – General

Comment ID	Comment
262	Areas of Critical Environmental Concern (ACEC), Research Natural Areas (RNA), etc. Depending on their locations, the management focus, and their associated terms and conditions, such designations may have an adverse effect on our ability to effectively manage our projects and facilities. However, they may also complement some of our wildlife mitigation areas.
398	Dolores River Canyon is a very special area and deserves all the protection possible. To underscore the point, in our hike down to the wash from Wray Mesa we found a large hanging garden which had lots of the rare Eastwood monkey flower.
399	Nyswonger Mesa is an area that needs protection. It is bounded by Paradox Valley on the north, Dolores River on the south and east, and La Sal Creek on the west . At the present time there is not access for motorized travel to the mesa. There is an old road, now a pack trail, that was used during the Uranium days. The track is very, very steep and completely washed out in several places. This road should be permanently closed as this would limit access except by foot and pack travel. The road is downright dangerous for anyone trying to drive up it at this time. The road is closed at the BLM property line just south of CO□90 and west of Bedrock, however a four-wheeler did drive up to near the top last year. The pinyon/juniper forest and its birds may be the main wildlife values. Hikers can enjoy solitude and great vistas looking down 1500 feet to the Dolores River, Paradox Valley and La Sal Creek below. This is a wonderful, quiet place and will away remain that way unless a road is again constructed to the top. During the past Uranium boom little or no Uranium was found on Nyswonger Mesa. I do not know if there are present claims. I do believe most of Nyswonger Mesa belongs in the Dolores River Canyon Wilderness Study Area.
403	The part of Saw Tooth Ridge that qualifies for consideration is not a large area. It is valuable for wildlife, mountain lions, bear, western spotted skunk, gray fox and many smaller mammals. This is the only place in western Colorado that I have seen western spotted skunk. I have completed the Atlas II priority block. Other field workers did the work 20 years ago and the data is available. There were 58 species of birds using the area during Atlas II. The area lies in the Uranium belt but there are no mines in the area. I am not sure about claims, however.
464	I also don't want to see any more improved recreation outside the existing NCA areas. Special land designations lower the quality of habitat not only for livestock, but wildlife as well. It also takes away flexibility of management for any lands. We also have 2 NCA areas that provide that improved recreational opportunity for people that desire such.
582	The following areas adjacent to The Tabeguache SMA should be added to the SMA. Shavano, Campbell, and Burro Creek drainages north of the Tabeguache.
633	Thanks for considering these. In general, I hope that the UFO prioritizes maximum protection for all its natural lands to maintain their natural character—Wilderness Study Areas and other lands with wilderness qualities, in all the places and in whatever combination they exist; roadless lands; non-motorized, quiet used areas; Areas of Critical Environmental Concern; Outstanding Natural Areas; and other important landscapes.
815	Payson's lupine (Lupinus crassus): Designate an ACEC or initiate other special management to protect the populations of Payson's lupine in Paradox Valley. Refer to CNHP's Potential Conservation Areas and surveys to be conducted in 2010 for plants' distribution.
969	Lack of protection for areas that are non-motorized and unroaded.
1007	Other precious and fragile areas within the UFO that deserve more protection include the Dolores River Canyon, areas adjacent to the Adobe Badlands WSA near Delta and the Tabeguache Special Management Area near Nucla, and the Uranium- Vanadium belt, especially if mining resumes with construction of a processing mill in the Paradox Valley.
1214	As mentioned at the beginning of the 'Recommendations' section, CNAP recommends that the BLM retains the special management area designations for the existing ACECs and Natural Areas within the Uncompahgre Field Office. In addition, CNAP recommends that all areas designated as a special management area in the revised RMP would be available for listing on the state's Natural Areas Program administered by the Colorado Department of Natural Resources.
2040	Dolores River Canyon Special Recreation Management Area (SRMA) The 1985 San Juan/San Miguel Planning Area RMP designated the Dolores River Canyon as a Special Recreation Management Area. The boundary took in the entire corridor from the McPhee Reservoir to Bedrock, and included the Dolores River Canyon WSA.

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Comment ID	Comment
	Since BLM management boundaries have since been changed, a portion of the SRMA is now within the San Juan FO and a portion is within the Uncompahgre FO. We recommend that The Dolores River Canyon SRMA retain its special management status, including the portion within the Uncompahgre Field Office. The San Juan Public Lands Draft Land Management Plan released in 2007 maintains a special designation for the portion of the corridor in their jurisdiction.
2047	Impacts of development within the corridor are not consistent with protection of outstandingly remarkable values associated with wild and scenic suitability or the existing Special Recreation Management Area Designation.
2060	The Dolores Corridor should be managed in close cooperation with adjacent BLM Field Offices. For example, the Dolores River Canyon Wilderness Study Area is bisected by the UFO and the San Juan FO, but requires consistent and close management, especially considering issues with motorized incursions from the Utah. The Sewemup Mesa CWP expansions to the existing WSA also overlap the Grand Junction and Uncompahgre BLM field offices. Significantly, the river itself crosses boundaries between the San Juan, Uncompahgre, and Grand Junction Field Offices. It is important that the river ecosystem be considered as a whole in order to institute management that maintains its unique qualities. We urge the Uncompahgre Field Office to adopt a broad vision of the landscape in approaching the cooperative management of these areas.
2077	The current RMP is a one-time opportunity to set aside these less roaded areas for the uses above, by closing the remaining roads and establishing the areas as unroaded, non motorized quiet use or just plain wildlife areas.
2087	We also sketched impressionistic boundaries around several of Colorado Natural Heritage Program Potential Conservation Areas to see if there was any overlap. This showed that in at least two cases PCAs intersect or are adjacent to unroaded areas and could be combined to make a larger protected area.
2089	The overlay process will also help define appropriate and manageable boundaries including whether the areas should be combined with adjoining Special Management Areas, PCAs or other special areas. We would be happy to work with the BLM on further defining logical boundaries, closure points and other planning needs.
2327	Please Please Please do not allow harmful mining or drilling in the wildlife habitat regions. PLEASE
2517	I am particularly concerned that on your maps the San Miguel Area of Critical Environmental Concern appears to overlap extensively with oil and gas leases. All of the ACECs deserve protection.
2523	Development in this region for uranium, oil and gas, or off road vehicle recreation must be appropriately sited outside of sensitive lands.
2525	To the extent that any new oil and gas development is going to occur-and we need to keep it at an absolute bare minimum-it MUST be kept securely FAR AWAY from sensitive areas like the Dolores River Basin and the Uncompahgre.
2641	Man must permit free areas for nature to protect the environment and all life forms in the protected areas and permit limited projects in areas determined to have energy production possibilities!!! As these are protected areas owned by the American public, the companies should pay a fair price for the use of public resources as they are for profit companies. No more free resources to for profit companies!!!
2697	Thank you for the opportunity to comment on the Uncompahgre RMP revision. I wish to support the view that any development for resources or motorized use be kept separate from critically sensitive lands that warrant protection for their natural values and for the wildlife dependent upon them.
2777	Special Management Proposals As noted above, the BLM has a variety of tools for protecting natural values. Included with these scoping comments is 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 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. In addition to our CWPs, 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. e. Analysis of Environmental Consequences NEPA requires federal agencies to assess the direct, indirect and cumulative environmental impacts of proposed actions, taking a "hard look" at environmental consequences and performing an analysis commensurate with the scale of the action at issue. 42 U.S.C § 4321 et seq; 40 CF.R. §

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	1508.8; see also Metcalf v. Daley, 214 F.3d 1135, 1151 (9th Cir. 2000); Robertson v. Methow Valley Citizens Council. 490 U.S. 332,348 (1989). NEPA defines "cumulative impact" as: the impact on the environment which results from the incremental impact of the action when added to other past/ present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. 40 CF.R. § 1508.7. (emphasis added). Throughout these comments, we have identified analyses required to evaluate the direct, indirect and cumulative impacts of decisions made in the RMP, such as health impact assessments and air quality modeling. 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.

Table C-11
Issue 1: Special Designation Areas – Areas of Critical Environmental Concern

Comment ID	Comment
2791	ACEC Designation 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: The 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.
2799	The BLM should retain existing ACECs and consider strengthening the protective management attached to them. BLM should carefully review existing management of ACECs, ensure that the agency is meeting its obligations under the BLM Manual, and strengthen protections in these areas if necessary. Again, ACEC protection is one of the main tools at the BLM's disposal to conserve imperiled species, and the agency must take this responsibility seriously.
32	All existing ACECs should be kept. The Fairview area should be enlarged to whatever size is required to protect the buckwheat.
33	Other rare plants such as the Paradox Valley lupine, deserve their own ACEC.
34	The most obvious need for ACECs to protect wildlife habitat is the best remaining large areas of semi desert/salt desert habitat for the two prairie dog species and their associated species. The most obvious place for this is the east side of Highway 50, across from the Escalante Canyon turn off. This would fit the CDOW to "Work with public land agencies and other affected stakeholders to identify management emphasis areas (MEAs) (within the GUPD and WTPD IPAs) where intensive management can focus on landscape scale conservation for the entire prairie dog ecosystem." from their /Grand Val and Uncompahgre Valley Action Plan/ for white-tailed prairie dogs. If there is a similar area of Gunnison's prairie dogs in the UFO's west end, it could be considered as an ACEC, too. Management of these would be mainly travel management and weed control.
132	TMW ATV club is very knowledgeable about the inventory of different ACECs on public lands within the planning area. We are active in preserving these resources and work tirelessly, and contribute literally hundreds of thousands of dollars from our grant funds to protect them. We acknowledge the fact that some areas of the UFO possess significant historic, cultural, or scenic values, fish or wildlife resources, or natural hazards.
133	TMW specifically recognizes the North Delta Adobes area as an area of critical environmental concern. We are aware of the many trails in the area that may contribute to resource proliferation. We strongly feel that the resource damage can be mitigated and believe the continued use of the area can be utilized via a designated trail system.
134	We ask the RMP Planning Team to be cautious of being unduly influenced from the anti-motorized community in Protecting Significant Values. We remind the Planning Team that these restrictions are designed to protect the values and/or serve the purposed for which the designation is made. Management prescriptions are developed expressly to protect the important and relevant values of an area NOT from the undue influence from the environmental community.
341	The entire ACEC and adjacent areas of the San Miguel River Canyon is a scenic and natural treasure and its scenic, natural, wildlife, habitat, species and recreational value should all be protected as the highest and best use of the area. Surface energy development of any sort including oil and gas, solar and geothermal should be minimized, tightly restricted or eliminated. The current level of access and facilities for recreation in this area is very good and should be maintained at current levels.
346	Restrict any further development of access to Saltado Canyon. Eliminate the following, as found in San Miguel ACEC Record of Decision: Trails in Saltado and Beaver Creek Canyons may be constructed as well as a boat ramp on the San Miguel at Beaver Creek. If feasible, a bicycle and foot trail.
351	The entire San Miguel River ACEC and the entire BLM holdings in Saltado and Specie Creek Canyons should be

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Comment ID	Comment
	"No Surface Occupancy" stipulations for O&G and other energy development to protect scenic values and natural values. Given the low probability of any O&G development ever occurring there is little or no cost to such actions. Geothermal leasing should NOT be allowed in this area until very tight regulations are developed, if at all.
556	All existing ACECs should be kept. Additional ACECs are recommended by the Colorado Natural Heritage Program within the UFO to protect rare and imperiled plants. I support the designation of all ACECs recommended by the CNHP.
557	The Fairview area should be enlarged to whatever size is required to protect the buckwheat. Other rare plants such as the Paradox Valley lupine deserve their own ACEC.
558	In addition, I would like to see the BLM designate known Gunnison sage grouse Lek sites and concentrated nesting/brood rearing habitat as an ACEC. Specific sites are displayed in the Gunnison Sage Grouse plan for the San Miguel Basin.
559	To protect the significant values present within the ACECs I would like to see the BLM withdraw all mineral leases from these areas. The development of gravel mines in the San Miguel River occurred in the past and should now be prohibited in order to protect the unique riparian vegetation communities, wildlife, and recreation/scenic values. Similarly, oil and gas leases should be withdrawn from all of the ACECs to prevent irreparable damage to existing resource values from these activities.
689	In the RMP revision process, BLM should consider special management designation and policies for occupied and historic Gunnison Sage Grouse habitat as Areas of Critical Environmental Concern (ACECs). These policies should maintain and improve this habitat.
712	Also, continued protection is needed for designated ACECs , such as Fairview, Needle Rock, Adobe Badlands, and San Miguel.
814	Clay-loving wild buckwheat (Eriogonum pelinophilum): Expand the Fairview South ACEC to the south to encompass all populations on BLM land. Also add other areas of the UFO that support the buckwheat, even if they are not contiguous with existing ACECs
875	The Roubideau area contains historic places of a couple of old homesteads and cattle trails. Cultural places of petroglyphs. Scenic, wow, the whole place, stand anywhere along the east rim and look over the canyon to the west, or east to the Uncompahgre River valley. Walk up Roubideau Creek from the end of the road in the bottom of the canyon and stand in awe of the spectacular cliffs on each side of you. Look up at caves, and the erosion by wind. Somewhere in this special drainage there must be plants that need protected. The entire area is abundant with wildlife. There are bears and mountain lions year round. Lots of raptors raise their young in this drainage. Has anyone checked on the fish? Locals tell me 30 years ago there were lots of fish in the Roubideau and Potter Creeks, but now it's not worth even trying to fish.
920	I believe all Areas of Critical Environmental concern should be afforded continued protection. There are probably other areas that should be identified as ACEC, but I have not yet found the time to locate them.
996	I was relieved and grateful to see in the Travel Management Plan recently adopted, that Potter and Monitor were maintained for foot and horse travel only. This decision should be preserved, and if possible, I encourage the BLM to add a more formal status to the areas, such as designating them Areas of Critical Environmental Concern. For recommended boundaries, I would refer you to maps prepared for the Colorado's Canyon Country Wilderness Proposal: Roubideau Addition (http://www.canyoncountrywilderness.org/maps/hires/roubideau_0706.jpg) on which I helped with field reconnaissance and map creation.
1197	Within the land managed by the Bureau of Land Management's Uncompahgre Field Office, and included in the RMP revision, there are two such designated Natural Areas with the aforementioned examples of statewide significance. (See attached Articles of Designation for legal descriptions and conditions of these agreements.) The Natural Areas and their attributes are listed below. • Fairview South Natural Area, 205 acres: This area was designated a state Natural Area in 1992 because it contains a significant portion of one of the largest populations of the federally endangered plant, Eriogonum pelinophilum (clay-loving buckwheat). This species is endemic to the Adobe badlands of Montrose and Delta counties, with the known range restricted to less than 35 square miles. The

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Comment ID	Comment
	area also contains native plant communities representative of the sparsely vegetated adobe badlands and a population of Penstemon retrorsus (Adobe beardtongue, a globally vulnerable G3-S3 plant). This Natural Area actually encompasses two parcels that make up 347 acres, however, the portion that we are commenting on is 205 acres known as Fairview South. The 142 acre Fairview North parcel is within the Gunnison Gorge National Conservation Area and is not considered within this UFO RMP. This site was collectively referred to as 'Management Unit 13' in the 1989 Uncompahgre RMP. • Needle Rock Natural Area, 83 acres: This area was designated a state Natural Area in 1992 to protect a volcanic geological structure with high value scientific, interpretive and scenic characteristics. Needle Rock towers 1100 feet above the Smith Fork of the Gunnison. It originated during volcanic activity 28 million years ago (Oligocene) as molten rock intruded between existing sedimentary formations. This Natural Area also protects a population of Penstemon retrorsus (Adobe beardtongue, a globally vulnerable G3-S3 plant). This site was referred to as 'Management Unit 14' in the 1989 Uncompahgre RMP. It should be noted that all 4cres of designated state Natural Areas occur on sites that also have been designated as 'Areas of Critical Environmental Concern' (ACECs) for their valuable features. Hence, the importance of both of these sites to the state of Colorado and to the federal government is well-supported.
1198	Based on the significance of these properties and the Colorado Natural Areas Program's interest in cooperatively protecting the natural features on each site, CNAP would like to provide the Uncompahgre Field Office with several recommendations that would assure that the state Natural Areas are protected for the benefit of current and future Coloradans. First and foremost, CNAP recommends that the BLM retains the ACEC designations for both existing Natural Areas within the Uncompahgre Field Office that are mentioned above. These 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
1215	In relation to this topic [Special Management Areas], CNAP would like to point out areas on BLM property to be considered for ACEC designation and that are on CNAP's identified list of potentially suitable Natural Areas within the UFO: • Coyote Wash, 3500 acres: Coyote Wash is a tributary to the Dolores River Canyon and is incorporated within the Dolores Canyon Wilderness Study Area. Populations of Erigeron kachinensis (Kachina daisy), a G2/S1 BLM Sensitive Species, occur along drainages feeding into the wash and canyon; hanging gardens in the canyon walls support Mimulus eastwoodiae (Eastwood monkeyflower); another BLM sensitive species. Isolated benches in the canyon support Great Basin grassland communities in excellent condition. • La Sal Creek, 11,715 acres: La Sal Creek cuts a spectacular canyon of entrenched meanders through red Triassic and Jurassic sandstones and siltstones. The narrow floodplain supports a unique riparian community of box elder, river birch and red-osier dogwood. Eroding shale slopes support populations of the rare plants Pediomelum aromaticum, a G3/S2 BLM Sensitive Species, and Lupinus crassus (Payson lupine, a G2/S2, BLM Sensitive Species). • Young Egg Locality, 120 acres: This scenic area, at the mouth of Wells Gulch near the Gunnison River, consists of a section of the upper Jurassic Morrison Formation containing thousands of black eggshell fragments. The site represents a nesting site used repeatedly by dinosaurs. The site may benefit from protection from unsanctioned quarrying and vandalism. CNAP recommends that the UFO take the significant values of these areas into consideration when drafting the RMP revision.
1684	Offer maximum protection for all Areas of Critical Environmental Concern (ACECs) and continue to identify and protect other imperiled areas.
1724	Offer maximum protection for all Areas of Critical Environmental Concern (ACECs) and continue to identify

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Comment ID	Comment
	and protect other imperiled areas. In an area so vast, the BLM must offer special protection to any sensitive places that might be examples of disappearing landscapes and ecosystems [the whole San Miguel River corridor is an example.] Without the special treatment ACEC designation offers, species that are becoming imperiled will continue to get lost. I urge the BLM to aggressively search the UFO for special places that will need extra protection in the future and to use the ACEC designation to protect them.
2051	We request that the RMP prohibit mining related activities in areas of ecological significance such as river corridors, WSA's and ACEC's as well as SRMA's to protect quiet recreational experiences
2165	Six Areas of Critical Environmental Concern (ACEC) exist within the UFO planning area but two to those have been designated National Conservation Areas since the publication of the 2008 Preparation Plan and thus has been removed from the UFO plan revision. The four remaining ACECs are the Adobe Badlands, Needle Rock, Fairview, and San Miguel. The first three contain special management unit designations for their unique characteristics ill supporting federally listed threatened and endangered plant species, recreational importance, and high-value scientific, interpretive and scenic characteristics. The BLM is asking whether these current ACECs should be re-affirmed, expanded, or dropped under the new planning revision process. TU supports the current designation of the three ACECs mentioned above and requests the BLM re-affirm their ACEC status.
2166	TU supports this ACEC designation and wishes to request that the BLM consider the following recommendations: 1) enlarge the ACEC area to equal the SRMA, thereby enlarging the San Miguel ACEC to 32,641 acres; 2) to close the designated ACEC area to oil and gas leasing, place NSO restrictions as Conditions of Approval on most areas that have been leased, and close the area to geothermal leasing; and 3) as described below, include segments of the San Miguel that arc deemed appropriate for Wild and Scenic designation. Increasing the ACEC reach to include additional BLM lands in the San Miguel drainage would increase the protection of critical winter range for big game, would further protect fisheries habitat, would help protect bald eagle habitat and would encourage connectivity maintenance and protection of big game migration corridors; these fish and wildlife qualities all meet relevance criteria for ACEC designation. With regard to importance criteria, expanding the San Miguel ACEC would include in the ACRC stream reaches that have been identified as suitable reintroduction habitat for CRCT populations (Figure 2), helping to preserve opportunities to expand populations of CRCT in the watershed. As noted above on page 5, the CRCT Conservation Strategy that the BLM is a signatory of states that "Land management agencies agree to protect existing and potential cutthroat trout waters from adverse effects of other land uses." This CRCT Conservation Strategy and the associated Conservation Agreement represent multi-party and multi-state efforts to conserve and restore CRCT, and because the BLM is a party to this agreement and strategy, suitable reintroduction habitat for CRCT meets the importance criteria for ACEC designation. Additionally, the San Miguel River is a well-recognized recreational trout fishery that attracts anglers' both locally for Telluride and other communities and regionally for tourism, meeting importance criteria for the trout fisheries in the San Miguel. Considerable interest and activity has occurred in oil and gas development and in geothermal development since the 1993 decision. The entire San Miguel River corridor and adjacent landscape is identified by BLM as high geothermal potential and high oil and gas potential. Though the 1993 ROD indicated low to moderate energy development potential (ROD, page 10), this scenario has arguably changed with a new energy development appetite and new technologies or accessing previously access-challenged reservoirs. In addition to providing important habitat for CRCT, this area also provides significant roosting sites for wintering bald eagles and provides sever winter range for elk and mule deer. TU believes that the San Miguel River ACEC should not only be reaffirmed based on its unique, high quality riparian vegetation resources, the scenic values of the corridor, the importance of wildlife and fisheries habitat, and the preservation of relic riparian communities, but we recommend that BLM enlarge the San Miguel ACEC to match the boundaries of the SRMA. We strongly believe that enlarging the ACRC will still meet the relevance and importance criterion required to be designated as such.
2226	All existing ACECs should be kept. There are four ACECs in the UFO: Fairview, Needle Rock, Adobe Badlands, and San Miguel. The Fairview ACEC protects only part of the habitat of the endemic clay-loving buckwheat. This ACEC should be enlarged for greater protection
2227	To protect the significant values present within the ACECs, the BLM should withdraw all mineral leases from these areas, including oil and gas leases. The development of gravel mines in the San Miguel River occurred in the past and should now be prohibited in order to protect the unique riparian vegetation communities, wildlife, recreation, and scenic values.
2228	The Colorado Natural Heritage Program has recommended additional ACECs within the UFO to protect rare

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	and imperiled plants. We support designation of all ACECs recommended by the CNHP.
2229	Some areas to consider for ACEC status: Tabeguache Pueblo and Tabeguache Caves. These contain important archaeological sites that show a relationship between the Fremont and Anasazi cultures. There is some evidence of farming (corn production).
2230	Some areas to consider for ACEC status: Paradox/Long Valley: important rock art and archaeological area. Investigate possible conflicts between peregrine falcons and hang gliders on the cliffs above Paradox. The Paradox Valley lupine, deserves ACEC.
2231	Some areas to consider for ACEC status: Lower Uncompahgre Plateau Area. There are many scattered important archaeological sites that include archaic to Ute occupation in the 1880s, e.g. the Harris Site, rock art sites, and wickiups.
2232	Some areas to consider for ACEC status: Gunnison sage grouse sites. The UFO should designate known Gunnison sage grouse lek sites and concentrated nesting and brood rearing habitat as an ACEC. Specific sites are displayed in the Gunnison Sage Grouse plan for the San Miguel Basin.
2235	There is a need for ACECs to protect wildlife habitat in the best remaining large areas of semi desert/salt desert habitat for the two prairie dog species and their associated species. The most obvious place for this is the east side of Highway 50, across from the Escalante Canyon turn off. This would fit the CDOW plan to "Work with public land agencies and other affected stakeholders to identify management emphasis areas (MEAs) (within the GUPD and WTPD IPAs) where intensive management can focus on landscape scale conservation for the entire prairie dog ecosystem." from their Grand Valley and Uncompahgre Valley Action Plan for white-tailed prairie dogs. If there is a similar area of Gunnison's prairie dogs in the UFO's west end, it could be considered as an ACEC, too. Management of these would be mainly travel management and weed control.
2610	All the ACECs should be closed to livestock grazing. No new leasing for oil, gas and minerals should occur in these areas and in all other areas until the current leases expire and/or are being developed. The low percentage of active leases relative to those leased dictates no further leasing during this planning period and former leases are closed and restored.

Table C-12
Issue 1: Special Designation Areas – Wild and Scenic Rivers

Comment ID	Comment
61	On behalf of Mika Ag Corporation d/b/a the Escalante Ranch, the purpose of this letter is to provide comments related to certain proposed river segments included in the Uncompahgre Field Office Draft Wild and Scenic Rivers eligibility study. This Draft report is being completed based upon the Wild and Scenic Rivers Act. The Wild and Scenic Rivers Act ("WSRA"), 16 U.S.C. § 1273(b) defines wild, scenic and recreational river areas. The statute requires that "[e]very wild, scenic or recreational river' in its free-flowing condition, or upon restoration to this condition, shall be considered eligible for inclusion in the National Wild and Scenic Rivers system and, if included, shall be classified, designated, and administered as [either a wild, scenic, or recreational river area]." The definitions of each are as follows: (1) Wild river areas--Those rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and waters unpolluted. These represent vestiges of primitive America. (2) Scenic river areas--Those rivers or sections of rivers that are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads. (3) Recreational river areas--Those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past. 16 U.S.C. § 1273(b). The river segments described below do not meet the above definitions and should not be withdrawn from further consideration under the WSRA.
62	In considering whether a river segment is "free-flowing" and eligible for inclusion in the Wild and Scenic River System, the statute states: existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping, or other modification of the waterway. The existence, however, of low dams, diversion works, and other minor structures at the time any river is proposed for inclusion in the national wild and scenic rivers system shall not automatically bar its consideration for such inclusion. 16 U.S.C. § 1286(b). The BLM manual further explains that with respect to the "free-flowing" requirement: Congress did not intend to require rivers to be "naturally flowing," i.e., flowing without any upstream manipulation except by nature. The presence of impoundments above and/or below the segment (including those that may regulate the flow regime through the segment), existing minor dams, and diversion structures within the [area] shall not by themselves render a river ineligible .... A river need not be "boatable or floatable" in order to be eligible. For purposes of eligibility determination, the volume of flow is sufficient if it is enough to maintain the outstandingly remarkable values identified within the segment. 2004 - 196 Memorandum at 16. In addition there is no length requirements in order for a river or river segment to be eligible. Draft report at 8.
63	The second requirement for eligibility within the System is the presence of "outstandingly remarkable values." The Wild and Scenic River Act does not define any of the "outstandingly remarkable values" in section in section 1273. Nor does it appear that there is a minimum number of ORVs that have to be present. If there is one found within the river corridor and the river is considered "free-flowing" that river may be eligible for inclusion. Any qualifying ORV "should be located in the river or on its immediate shorelands, contribute substantially to the functioning of the river ecosystem, and/or owe their location or existence to the presence of the river." 2004-196 Memorandum at 2. The Draft report explained that the ORVs have to be river related and to be "outstandingly remarkable" the value "must be unique, rare, or exemplary, as well as significant within a defined 'region of comparison.'" Draft report at 9. This definition was created by the National Park Service and has been upheld. Friends of Yosemite Valley v. Norton, 194 F.Supp.2d 1066,1086 (E.D. Cal. 2002). The Draft report explained that a "region of comparison:" is used to compare the special values for which a river is being considered against comparable elements within a defined geographic area. The area, region, or scale used for comparison is not fixed, and should be that which best serves as a basis for meaningful analysis-it might vary, depending on the value being considered.
64	The 8351 manual provides explanations and descriptions of the "outstandingly remarkable values." Those are: 1. Scenic: The landscape elements of land form, vegetation, water, color, and related factors must result in notable or exemplary visual features and/or attractions within the geographic region. The exemplary visual features and/or attractions within the geographic region .... When analyzing scenic values, additional factors Such as seasonal variations in vegetation, scale of cultural modifications, and length of time negative intrusions are viewed may be considered. Scenery and visual attractions may be highly diverse over the majority of the river segment length and not common to other rivers in the geographic region. 2. Recreational: Recreational opportunities are or have the potential to be unusual enough to attract visitors to the geographic region. Visitors are willing to travel long distances to use the river resources for recreational purposes. Recreation-related opportunities could include, but not be limited to, sightseeing, wildlife observation, camping, photography, hiking, fishing, hunting and boating. Interpretive opportunities may be exceptional and attract or have the potential to attract visitors from outside the geographic area. The river may provide or have the

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	potential to provide settings for national or regional commercial usage or competitive events. In addition, the river may be eligible if it is determined to provide a critically important regional recreation opportunity, or be a significant component of a regional recreation opportunity spectrum setting. 3. Geologic: The river or the area within the river corridor contains example(s) of a geologic feature, process, or phenomenon that is rare, unusual, or unique to the geographic region. The feature(s) may be in an unusually active stage of development, represent a textbook example and/or represent a unique or rare combination of geologic features (erosional, volcanic, glacial, and other geologic structures). 4. Fish: Fish values may be judged on the relative merits of either fish populations or habitat, or a combination of these river related conditions. a. Populations. The river is nationally or regionally one of the top producers of resident, indigenous, and/or anadromous fish species. Of particular significance may be the presence of wild or unique stocks, or populations of State, federally listed, or candidate threatened and endangered species. b. Habitat. The river provides exceptionally high quality habitat for fish species indigenous to the region. Of particular significance is habitat for State, federally listed, or candidate threatened and endangered species. 5. Wildlife: Wildlife values may be judged on the relative merits of either wildlife populations or habitat, or a combination of these conditions. a. Populations. The river or area within the river corridor contains nationally or regionally important populations of resident or indigenous wildlife species dependent on the river environment. Of particular significance may be species considered to be unique or populations of State, federally listed, or candidate threatened and endangered species. b. Habitat. The river or area within the river corridor provides exceptionally high quality habitat for wildlife of national or regional significance, or may provide unique habitat or a critical link in habitat conditions for State, federally listed, or candidate threatened and endangered species. Contiguous habitat conditions are such that the biological needs of the species are met. 6. Cultural: The river or area within the river corridor contains a site(s) where there is evidence of occupation or use by Native Americans. Sites must be rare, have unusual characteristics, or exceptional human-interest value(s). Sites may have national or regional importance for interpreting prehistory; may be rare; may represent an area where culture or cultural period was first identified and described; may have been used concurrently by two or more cultural groups; or may have been used by cultural groups for rare or sacred purposes. 7. Historic: The river or area within the corridor contains a site(s) or feature(s) associated with a significant event, an important person, or a cultural activity of the past that was rare, or unusual in the region. A historic site(s) and/or feature(s) in most cases is 50 years old or older. Sites or features listed in, or eligible for inclusion in, the National Register of Historic Places, may be of particular significance. 8. Other Similar Values: While no specific evaluation guidelines have been developed for the "other similar values" category, additional values deemed relevant to the eligibility of the river segment should be considered in a manner consistent with the foregoing guidance -- including, but not limited to, hydrologic, ecologic/biologic diversity, paleontologic, botanic, and scientific study opportunities. The Draft Eligibility Report for the Uncompahgre Planning Area included a ninth ORV called "vegetation" which explains that the "segment supports a riparian vegetation community that is a superior occurrence or is rare on a global basis." Draft report at 12. In applying these criteria to portions of the rivers included in the Uncompahgre Draft Eligibility Report, certain river segments do not meet the above requirements and should be withdrawn from further consideration.
65	The Dry Fork Escalante Creek Segment 2, particularly the lower portion which flows through the Escalante Ranch private property, does not meet the eligibility requirements under the WSRA. Although the draft plan notes the ORV for this section as "vegetation," the portion of the creek that flows through the Escalante Ranch private property is actually part of a hay meadow and orchard. The Ranch's private property is located on both sides of the creek. The creek physically flows less than 10 days per year. There are water rights and man-made diversions in this segment of the creek and livestock pasture fencing across the creek. There is a system of culverts that carry water that span the creek bed. A significant amount of brush has been removed from the private land and pushed up against the creek as rip-rap or berms to keep the creek from flowing into the orchard. Although the BLM draft plan claims that the ORV vegetation is "globally imperiled," there are thousands of acres of this same vegetation in this local area, including a significant portion on acreage that is not included in this draft report.
66	Escalante Creek Segment 1 also flows through the private property of the Escalante Ranch, as well as through BLM grazing allotments permitted to the Escalante Ranch. As with the Dry Fork Escalante Creek Segment 2, there are water rights and man-made diversions in this section of Escalante Creek as well as livestock pasture fencing and cattle water gaps across the creek. There is a privately owned cabin located directly on the bank of the creek, and a county road fords the creek bed. This creek also is not free-flowing year around and in fact completely dries during certain periods of the year. Although the draft plan claims that the ORV vegetation is

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	"globally rare," there are thousands of acres of this same vegetation in this local area, including a significant portion on lands that are not included in this draft report. With regard to the recreation ORV, kayacking already occurs on the BLM managed portions of the creek segment.
67	Escalante Creek Segment 2 flows through approximately 8 1/2 miles of Escalante Ranch's private property with less than 1 mile of this proposed segment flowing through BLM managed lands. This segment does not meet the eligibility criteria for a wild and scenic river as it contains eight dams and water diversions which cross the creek, most of which are 4 to 6 feet tall. During certain times of the year, no water flows in the creek after the last diversion. There is a system of culverts that carry water that also span the creek bed. There are dozens of fences and water gaps across the creek used as pasture fences for the Ranch's livestock grazing operation. There are five homesteads on the creek bank. There are also cattle working facilities located on the creek bank and a significant amount of rip-rap and other berm materials have been placed in and along the bank to keep these corrals, scales and other working facilities from washing out. A significant amount of work has been done on the creek to keep the water from cutting into the fields and orchard. This work includes man-made brush berms. There is no public recreation access to this part of the creek on the Ranch's private property. There is one diversion constructed by the county as a pool to get water for the county's use. Irrigation ditches parallel the creek for between one to two miles to get irrigation water to the Ranch's irrigated meadows and pasture land. County roads cross the creek in numerous places, and private ranch roads ford the creek in four additional places. There are basically no fish in this segment.
68	With regard to the ORVs, there are no Colorado hookless cactus or Eastwood's monkeyflowers in this section of Escalante Creek, although there is an ACEC to protect the monkeyflower in Segment 1. As with Dry Fork Escalante Creek Segment 2, although the draft plan claims that the ORV vegetation is "globally imperiled," there are thousands of acres of this same vegetation in this local area, including a significant portion on lands that are not included in this draft report. The owners of the Escalante Ranch have never viewed a falcon in this area in 20 years and the small band of Big Horn sheep that have recently moved into the area are located on the Ranch's alfalfa fields, and are not using the creek.
69	The Gunnison River Segment 3 also flows through portions of the Escalante Ranch's private lands. There is a bridge that crosses the River and the railroad right-of-way parallels a significant length of the proposed segment. The railroad has done a significant amount of man-made work in the river and on its banks to keep the river from washing out the right-of-way. There are several homes on the river bank. A large number of people camp within the railroad right-of-way and "calling attention" to this area by designating a wild and scenic river will simply compound this problem.
70	Although the map shows this [the] proposed segment stopping at the state land boundary, there is no explanation as to why. The lands owned by the state contain exactly the same components as those proposed by the eligibility report.
71	Although the draft plan notes the petroglyphs in the area, two of those are located on private land and there is no public access to these lands. There are 10 homesteads along this segment, two gravel quarries, many significant water diversions including at least four water pumping stations one of which is mounted on a man-made pier which extends into the river. The private land impacted by the proposed segment includes several orchards, irrigated pasture and cropland.
72	There is also a question about how the percent ownership of this segment was calculated in the draft plan. These percentage ownership calculations are misleading in favor of the BLM and must be corrected.
73	The Escalante Ranch appreciates the ability to comment on this proposal and requests notification of all other documents related to this proposal. Again, because the four segments listed above [Dry Fork Escalante Creek Segment 2 Escalante Creek Segment 1 and 2, and Gunnison River Segment 3], do not meet the criteria for inclusion under the WSRA and because any inclusion of these lands may have a detrimental impact on the current survey work and proposed land exchange relating to the recent wilderness designation, the four segments listed above should be withdrawn from further consideration. Should you have any questions please do not hesitate to contact me.
78	This is a letter of opposition regarding the Wild and Scenic eligibility of the Gunnison River including Escalante Creek, Roubideou Creek and their tributaries. Our family and friends have worked and enjoyed these areas for generations and we don't want the Gunnison River and its segments to be eligible for Wild and Scenic.
164	I have also read comments regarding the Draft W.S.R. Eligibility Report submitted by Marc Stimpert, on behalf

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	of Richard Miller and the Escalante Ranch. I find his comments and reservations to be sound reasons for removing Escalante Creek for eligibility status.
165	Further, I have a real tangible problem with the encouragement of kayakers through private land sections (particularly mine!). I have no problem with people running the creek down through public land sections, including the Potholes. However, for the past 8 years, I have had an increasing problem each spring (high C.F.M.S.) with kayakers who show no regard or respect for private property or conservation consciousness. They have driven around my posted gates; cut fences and destroyed pristine areas on and around my private land. They cut ugly tire marks through the cryptogamic soil that do not come back readily as they do when grazed on and tracked by cattle, sheep, and wildlife. The kayakers who "put in" between my southern boundary and the Escalante Forks consistently defecate and leave toilet paper along my portion of the creek. There is no management of this recreational use, even in the Public land portions.
166	For these reasons and due to private land and water ownership, I (and the other private land owners) would like to see at least the private sections of Escalante Creek removed from Eligibility status for the W.S.R.
167	I am part of the Western Chapter of the G.P.A.A. and do not believe that the San Miguel River should be part of the Scenic River Amendment. We take good care of the river by keeping it clean and trash free. All the panning for gold that we do does not affect the river flow as spring runoff puts it back as it has always been.
168	The government is getting to large as it is. We do not need this in Western Colorado as water rights are the most important thing in the west.
261	Wild and Scenic River Designation- Wild and scenic river suitability, designation and subsequent management actions should consider potential effects on water uses in the basin and cannot affect operation and maintenance of our water projects without Reclamation's concurrence.
263	We have no comment or recommendation regarding the proposed eligibility of the various stream segments. However, we will take another look at these segments during the suitability determination phase.
264	We suggest ranking the vegetative Outstanding Resource Value (ORV) based on the relation of a specific vegetative community to its historic range. That would appear to be more appropriate than the use of global rarity/importance rankings. The use of global rarity/importance rankings for vegetation ORVs seems misleading. In general, all endemic western Colorado riparian vegetation is going to be rare and likely considered imperiled on a global basis primarily because it only exists within a very small portion of the globe. The more specific endemic riparian communities and their components in western Colorado are even more globally rare, because they are an even smaller portion of the general western Colorado riparian classification.
265	Page 50, Map 5-11 Deep Creek: The map should be revised to show Bureau of Reclamation's (Reclamation) withdrawn lands at Paonia Reservoir. The current map shows Reclamation 's withdrawn land as BLM land. These withdrawn lands are Section 5A lands (Reclamation jurisdiction) pursuant to the 1983 BOR/BLM Interagency Agreement.
266	Page 51 , River Segment Ownership and Land Ownership Tables: These tables should be revised to include Reclamation 's ownership.
267	Page 94, Upper Dolores Hydrologic Unit Map: We recommend that the Dolores River Segment 1 be shown as eligible on this map.
268	We also recommend that you include a summary of the eligibility determination from the San Juan Public Lands (SJPL) Draft Land Management Plan here. The summary should be only for the 11.8 mile UFO portion of the larger 109 mile long McPhee Dam to Bedrock segment. You should use the same format used in this draft report (i.e., identify the location, length, ownership, ORVs, and preliminary classification). An eligibility summary of this segment in the same format as the rest of this document would help readers to visualize the eligibility of this segment without the clutter of the original SJPL analysis. As a part of this summary, a statement to the fact that the San Juan Public Land Center determined this segment eligible in their Draft RMP would be appropriate.
269	Pg. 97, 5) Wildlife - The narrative regarding peregrine falcons should be revised to reflect the actual status. How does the statement that peregrine falcon pairs were observed in Escalante Canyon relate to the wildlife Outstanding Resource Value (ORV) for this segment? Are peregrines, in fact, nesting/breeding within this segment?
273	The same principles of historic multiple use apply to private property rights along the segments of stream identified as eligible for Wild and Scenic River designation. In Colorado, water rights are private property rights

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	according to the Doctrine of Prior Appropriation. Ranches efficiently use and reuse water many times for irrigating crops and watering livestock along private stretches of streams and rivers.
282	I wholeheartedly support Wild & Scenic designation for the San Miguel within the RMP boundaries.
298	My main concern is when is -the Government going to wake up and realize they are broke, no money. This is just more governmental land grabs, that will end up costing tax payers more money. Nothing good will come from the change of designation for the San Miguel. The process you are going through right now is costing a bankrupt government more money.
299	We hold claims on the river, multiple families could eek out a livening if necessary, We pay fees every year to the BLM for being a claim holders, it makes no sense to take more money out of the BLMs coffers to add more regulation, plus take away more of our public lands.
300	The BLM needs to generate income, not add more employs and regulations. Look around , tax revenue is down and your wasting more tax dollars for what. Please wake up, the San Miguel isn't broken stop trying to fix it.
310	The Wild and Scenic River Act of 1968 was enacted during a time that dam-building was rampant. The act called for rivers with "outstandingly remarkable" characteristics to be preserved in their "free-flowing condition" for the enjoyment of present and future generations. According to Maggie Kelsey, Wild and Scenic Rivers coordinator for the BLM, "The purpose of the act was to have vestiges of rivers that weren't going to be totally industrialized, so that some rivers could just be rivers." Times and laws have changed dramatically in the 42 years since the act's enactment. Lands currently held by Federal agencies through which these waters flow are protected by proven existing laws and acts already in place. Development cannot take place, dams cannot be constructed without Federal approval, roads, trails, paths, and basically any improvement cannot be constructed nor used without Federal agency approval. The State owned land that these waters flow through should be under the jurisdiction of the State.
311	States' interests' need to be protected. This act could thwart Colorado's effort to develop its water supplies.
312	This then, leaves only the private properties through which the waters flow. This act usurps the property owner's rights in regard to their livelihood.. be it ranching, mining or just someone who wants to live without neighbors a stone's throw from their porches.
313	Our area is very arid; water is scarce and has been a major point of contention since man walked upright. The interpretation of this act may jeopardize water rights in areas that every drop of water is accounted for and used. Water utilization in the last 42 years has grown and is realized as an extremely valuable asset. An asset that human, livestock, bird, mammals, fish essentially every breathing thing depends on.
314	There are no guarantees through time and administrations on how these acts will be interpreted or used. This designation in other states has led to restriction in grazing and agricultural uses. It is my fear that awaiting Congressional approval our public lands agencies will manage these rivers as if they were wild and scenic, restricting water development, grazing, mining as well as promoting the recreational uses.
315	Your Eligibility Report has wonderful graphics, flowing language, tugging at heartstrings, envisioning a wonderful panoramic view ---BUT it does not address the people, the pioneers that have carved out their homes and ranches along these corridors. Your act will have far reaching economic impacts and personal hardships on these families. By using the ¼ mile each side of the water channel as your base, the percentage of federally owned lands versus private looks wonderful, appearing as if this act will not affect but a tiny percentage of small family lands. This report does not in fact address the fact that the private land is enormously affected as being the closest to the channel, affected the most. I think a good example would be like a large park in an inner city...beautiful, used by the multitudes, then a new act; lets' call it the Scenic and Wild Park act goes into effect: all of houses abutting the park will now be under park authority; types of lawns, how you mow them, fertilize or take care of those pesky grubs, if you drive your car down the street, can park by your house, maybe your dog will be too large or your children too loud, what your roof can look like and on and on. Wait a minute...aren't those little items already covered in building and municipal codes as well as covenants?
316	A great many of these river segments in the inventory flow through an area well documented holding a tremendous amount of uranium. In the years to come this uranium and the nuclear power plants may very well be our main source of energy. How will this act affect that industry? The Clean Air Act, Mining Act and a multitude of laws and acts already protect our environment.
317	As an aside, in your report, the old mining buildings are used as an example of cultural and historic remarkable

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	values, are these same buildings that in other reports are considered an eye sore, unsafe and need to be torn down and the sites returned to "native"?
318	The wild and scenic designation will not protect, it will only harm in the long term. I ask you to look at the laws and acts already in place and to utilize those tools. Use the federal resources in a positive way to make our environment better; not by more legislation, but by actual work, cleaning up trashed areas, building trails and improvements to lead the public where their use makes less of an impact. Education on the areas to "Leave no Trace", weed and invasive species eradication and patrolling will all do more to help our environment than another piece of unnecessary legislation that sure resembles a "takings" type legislation.
319	I am opposed to the utilization of this act on our rivers. I do not believe that this landscape has any more "outstandingly remarkable values" than any other part of the area. I am against designation of the Wild and Scenic designation of any of the river segments listed in appendix C Uncompahgre Rivers Inventory.
338	Saltado Creek Canyon is a spectacular steep sided, deep and wild canyon adjoining the San Miguel River canyon. It is the only major tributary canyon/stream to SMR that has no roads or bridges. It is a key wildlife corridor connecting Uncompahgre Plateau to the Delores Mountains and wilderness areas to south. The current level of access should be maintained and no further development of access should occur. It should be designated a "wild" river section as proposed in the WSR Eligibility Report. Hunting and grazing should be maintained with the possible exception of better protection for riparian habitat from cattle. No motorized access, other than emergency vehicles or maintenance, should be allowed. This area should be managed with wildlife being the predominant management goal. It is also prime Lynx habitat.
342	The San Miguel River corridor should be designated "scenic" as proposed.
359	In my opinion we do not need any more wild or scenic designations in this area. The local economy really needs to use this land. I do not believe there is damage being done so much that we need to not use the land at all. What good is the land to anyone if it can not be used for anything? God made the earth for man to use, he did not make it just to just look at. This area around Nucla needs to use this land!!
360	We do not need WSR Act in Colo. The San Miguel River doesn't need the WSA act. Designations.
367	We do not need any WSR designation in Colo. Public lands should remain multiple uses. Management is in place today, it works well now, it will work well into the future.
379	The use of our natural resources for livelihood is more important than for "wild," "scenic," or "recreation."
387	I have seen firsthand the effects of tourism pushing, as I watch the pristine archeological sites along our private areas and on the public areas along the Gunnison River and the Escalante Canyon, as they are falling victim at an alarming rate to vandalism and the need for all the tourists to leave their initials over the top of the sites. I have seen the trash scattered all around, cigarette butts lying amongst dry grasses, dirty diapers strung out on the road, our historical sites being vandalized and irreplaceable historical equipment and antiques stolen, Historical buildings have been burned to the ground. Along the Gunnison River, I am no longer comfortable with taking my children for walks along the river paths along the private property we live on due to the increasing run ins with rafters in the nude on our sides of the river banks, stepping in their defecation, picking up their beer bottles and trash, and the general lack of landowner respect whereas they camp wherever they like on the property leaving their trash for us to clean. Our cattle have had glass in their hooves, our property has been defaced and our livelihoods are interrupted by the influx of those who seem to think we need to relinquish our rights as property owners for the mere sake of an "aesthetic" experience.
388	Speaking of aesthetic experience, we put a lot of sweat and blood in to making that happen, as it is due to our toils on the lands that the deer, elk, desert bighorn, and countless other wild species flourish along this river and creek presenting magnificent "aesthetic" viewing opportunities to the tourists. We are the ones with the true, genuine love and respect for this land as we live in it, make our livings from it and work year round without paid vacations, sick leave, holidays, 401K plans, etc to steward it. We do not make decisions for it from our computer desks thousands of miles away in a Government office based on "studies" conducted by highly paid book educated environmentalists. We are in it and on it every day of the year, with no reimbursement for our contributions to it other than the enormous attorney fees out of our pocket to protect it. We do not have government or tax funded contributions for our efforts, and we are the ones watching it being taken away from us. The public is being given less and less opportunity to aid in the stewardship and decisions concerning these lands, and the entities promoting these proposals are bullying their way into the passing of such proposals.

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389	I feel that to cater to special interests only is wrong and un fair, and I feel that should this proposal be allowed to pass, the history of this area, the pristine of this area, the wildlife, the families and economy of this area are jeopardized strongly. I have seen first hand the crooked ways used to accomplish agendas by the BLM in the last couple of years (i.e. bold faced lying and the willingness to leave out important information regarding agendas) which has resulted in the growing lack of respect and desire to work with the BLM from local interests of all types, namely those being affected the most. I strongly oppose the WSR proposals for these areas, and will do my best to educate the public on what I have had the opportunity to witness during this process and other related processes in the recent last couple of years, so that they (public) have the right to know what all these kind of proposals actually entail. I do not support governmemal land grabbing.
390	This letter is to express my concern and opposition to the eligibility report for the Wild and Scenic River Act. Namely, the Gunnison River Segment(s) between Escalante Canyon and the Mesa/Delta county line, and the entire stretches of Escalante Creek and its tributaries. More importantly, the private property stretches involved. I believe these segments should be excluded completely from the inventory; the majority of these segments are along private property owned and operated by Dick Miller/ Escalante Ranch. The BLM grazing permits also belong to Dick Miller and Escalante Ranch. I do not believe that the entire segments that have been evaluated by the BLM without trespassing on the private property. Being manager of Escalante Ranch, I know permission was not given to the BLM to trespass on these private segments. The majority of the water rights along these segments also belong to Dick Miller/Escalante Ranch. When the water is being diverted to irrigate, the Escalante Creek can and/or is completely dried up, leaving no water for the in-stream flows being proposed by the BLM for WSR's.
391	There is also wording in the BLM manual that gives the BLM rights to acquire land along the segments in the WSR. The ability to acquire land also describes condemnation of water rights and private property as a BLM option should it deem necessary. That makes the WSR act on these segments unacceptable to me and likely the majority of the public.
392	If the eligibility passes, it could potentially jeopardize the well being of this ranch(s) along Escalante Creek and the Gunnison River. The Escalante Ranch employs as many as a dozen people along with their families that live and help out on the ranch. It would not be beneficial to the community to have these families displaced because the ranch could no longer sustain itself due to the restrictions of the BLM and the WSR.
393	When the NCA was designated, it was supposed to protect whatever was inside its boundaries, if protection is what the BLM was seeking, then why include these segments in the inventory? It is my understanding that if protective measures are already in place along these segments then there is no further need for these segments to be in the WSR inventory.
394	In conclusion, I am completely opposed to any WSR designations along the Gunnison River segments from the Escalante Creek to the Mesa/Delta county line, and also Escalante Creek and all it's tributaries in their entirety. I am also opposed to these segments being in the eligibility inventory. I would hope these segments be released from consideration before the suitability stage.
420	I personally think our tax dollars would have been better spent on road and trail maintenance not drawing up a plan of attack on the ordinary citizens that use public lands for recreation. The plan was put together to limit and drive out certain recreational groups such as fisherman and recreational dredgers that have legitimate placer claims on the San Miguel River or any other river that have placers on them. And last but not least my comment form is going to be sent to every conservative Governor, Senator, Representative and prospecting club in the state.
450	I am not in favor of converting the San Miguel River into a Wild and Scenic River.
451	I am not in favor of wild and scenic classifications for rivers anywhere ... this is public land ... leave it as it is!
452	Overall, we would ask you to make sure that all potential wild and scenic river corridors in the area be preserved and that any energy related development in those areas be avoided. We specifically are referring to the San Miguel River corridor, the Dolores River Basin and to Norwood Canyon.
478	This comment is regarding the implications of Wild and Scenic River designations. I have concern with Wild and Scenic River designations impacting existing and future water uses in the upstream watersheds. Wild and Scenic Rivers require minimum water quality and quantity standards. It should be clearly defined that a Wild and Scenic River designation can not impact upstream water users. If minimums water flows are established this could force municipalities, farmers, and mineral and energy development users to restrict their uses, which

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	would result in drastic economic hardships especially within the communities of the North Fork of Gunnison River.
488	In general, I support designations of "wild and scenic" to those stretches of water that warrant it and would hope that the few cases of private ownership of adjacent land that would be negatively affected could be dealt with individually.
490	With the current state of our economy, I believe the Wild and Scenic Act would be very harmful for the development of the West End on Montrose County. We need as a community, to be able to develop along the San Miguel River.
519	Rubideux Creek needs federal protection to prevent the State of Colorado Prison Camp from totally taking and interesting area fully of pre-historic Indian sites, wildlife, and scenic values.
521	The whole of the San Miguel River needs and deserves Wild & Scenic designation. The steep canyon side provide essential wildlife habitat and scenic values.
522	Saltado Creek is the wildest accessible (if you wade the river) area in this region. The Bill Carstens subdivisions of the properties on the mesa above provide good protection.
523	Beaver Creek while logged in the 60s still provides good over habitat and scenic values, plus amazing fishing.
574	The possible designation of Wild And Scenic Rivers on the San Miguel as it flows through Montrose County would be a huge blow to maintaining the agricultural/ranching flavor found there as well as impairing municipal and commercial growth and/or maintenance in that area of Montrose County.
610	For me specifically I kayak both the San Miguel and Doloras rivers many times a year. The San Miguel river from Norwood bridge to just above Pinyon bridge is currently being petitioned for a new wilderness area. As you know the area is mostly roadless and the experience is of isolation and seclusion. I hope you consider this proposal in the RMP revision process. I also understand that Congress designates wilderness solely but it may be a good idea to include in the new RMP as a study area for wilderness. The second area is the Doloras river. This river may qualify as a wild and scenic river. I hope you consider this as a possibility.
611	To me, oil and gas surface occupancy does not fit the character of these river systems. Oil and gas surface operations are industrial in nature and these rivers currently do not exhibit those traits. New exploration would likely reduce the current character of the river and thus likely change the experience one would have on both rivers.
665	We are concerned that the 2006 field season was not long enough to collect the needed data for the draft Wild and Scenic River Eligibility Report.
666	We are concerned that segment classifications will hinder Norwood Water Commissions future development of a Conditional ? Water ? On the San Miguel River.
686	The San Miguel River Corridor is an important natural and economic asset to San Miguel County. The scenic byway, fishing, and rafting use make it one of the most appreciated natural features in the county. The BOCC has reviewed the Wild and Scenic eligibility analysis developed by BLM. We concur with your findings of eligibility as they relate to waters within San Miguel County. We look forward to working with BLM to complete the suitability analysis and develop a management strategy that provides the San Miguel corridor with comprehensive and durable protection.
697	I am concerned about the San Miguel River being designated a wild and scenic river. This designation would put too much control of the river in the hands of the government and environmentalists.
699	Any decisions about management of the river should be kept away from environmentalists. People making the decisions, not some person in an office somewhere that hears a story about a fish or a bush and thinks they know what is best for the area.
700	Public lands should be just that, "Public." Road closures and limitations on river use should not be controlled by the government. It should be controlled by local groups that know the area.
701	A wild and scenic river designation is totally ridiculous. This is just another example of people in government trying to control things they know nothing about. This designation would be detrimental to our community and way of life.
726	If the San Miguel River is made a wild/scenic river what will be the dispositions of existing gold claims on the

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	river? Will motorized equip, eg dredges and high bankers be prohibited?
727	I would change nothing and keep the river as it is, and keep its many uses intact w/o further designation.
755	Please leave our rivers as they are.
758	River rafters and hunters are fine along with grazing and farming.
759	We all need to be able to use the rivers as intended. Drinking, flushing and irrigation.
796	I am writing to express my concern for more restrictions regarding the San Miguel River. I am a prospector and current placer claim holder on the San Miguel. It has been proven that dredging with a small dredge (4" or less) not only cleans the sediment left from snow melt and storms and enhances fishing habitat, but also cleans the river of harmful mercury and lead from fishing. We as prospectors live by a code of ethics leaving the area cleaner than we found it, many times cleaning up trash and feces left by kayakers and rafters. We fill in our holes. We are good stewards of the land. We do not interfere with kayakers and rafters as they require high water and we require low water. Please protect our freedom to access and use this river that we love, respect and protect.
804	As a gold prospector who has gold claims on the San Miguel River we are concerned that there was no information given about our rights as prospectors. All that was mentioned was boaters and fishermen. We don't want it to be part of the WSR system. We are not doing any damage to the river. We feel we are cleaning up the river. We have picked up trash (from the boaters) we have gotten mercury out, broken glass, lead weights.
805	We also feel that it will affect the water rights of the people in Nucla.
812	I am a prospector on the San Miguel River and I feel that I have no representation from anyone on this plan. All anyone can talk about is the rafters, kyakers and fishermen. I feel the wild and scenic that is being considered is not needed and should be dropped.
817	Rivers: Pursue Wild and Scenic River designation, or failing national designation take steps locally to protect the high quality riparian areas that were deemed eligible by the study group that met in March, 2009.
824	I am very concerned about the decision to turn the Gunnison River and Escalante Creek areas into the wild and scenic. I am strongly opposed to the decision to do so as it poses great threat to my job in provision for my family of five if Mica AG Inc/Escalante Ranch is terminated. Please consider the livelihood of those who live on and around the Gunnison River and the Escalante Creek areas.. We are concerned citizens who exercise our rights as American citizens in voting processes and legal matters.
874	Wild and Scenic Rivers: Did anyone take a look at the Roubideau and it's tributaries?
894	Stop the wild and scenic designation process.
908	Our concerns are with the Wild River Scenic Issue. We are against the proposal. We want the San Miguel River left like it has been for years in the past.
909	There should be no landscape changes because the width along the river does not allow for any.
910	Keep the River on the multi-use concept.
911	We are ALL against the Dustream Flow!
913	Please do not do anything that would cause the people to lose some more of their great heritage such as being able to use and enjoy our lands. This includes fishing. camping: floating the rivers or the pursuit of finding a small amount of gold or a bigger amount if able.
919	Please continue to manage wilderness study areas as such and maintain them as suitable for inclusion as Wilderness Areas. However, I question some of the wilderness characteristics of Adobe Badlands because of the noise from air and auto traffic.
924	Leave this area alone. Let us do what we have been doing for so many years.
925	Make no physical modifications or otherwise. What is wrong with what it looks like now? This is nature at its finest.
928	All is needed for regulations is to enforce what is on the books. No need adding more regulation that is not enforced now.

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930	Number of users is not a issue. Size of user groups is not a issue. Behavior of the Early Spring Group. As follows, lack of consideration land owners and others, the frame of mind to use, abuse and let someone else take care of what is left behind. Lack of consideration for wild life and environmental impact.
931	If this project should go forward, this will become a place that will not be dealt with and become a wasteland with more regulation, closing of the area. Far reaching outside the scope of this. Loss of jobs and businesses within the affected area. This club has also sent 3 Cancer kids to a camp every years. This club will dissolve will no longer send these kids to camp.
933	Reading the literature that pertains to this project, I find that this is inclusive completely up to personal interpretation by few for their personal gain. This will only benefit a few and not everyone. Lack of knowledge and education of endangered species by the few that will have access. Without diversity of the users there will be no options for diversity. Open Space will become a private playground for a few special groups, excluding the real stewards. Again lack of knowledge and education of historical and archeological surrounding by the few that want change. As for historical meaning, I went to school in Uravan. Lived my entire life in Colorado. Of all the changes in this area, this has to be the worst.
934	History will tell you that this is a bad idea and destined for failure for wild life, archeological, endangered species, biological and preservation of open space. Living in the back country most of my life, I can see where there is a lot of loop holes in this project. It is very obvious who and what has started this project.
935	What is wrong with the Uncompahgre as it is now. This has been a great place for local people, along with the wild life and purity of the water shed. Why change this with a study being done by non-locals. If this takes effect, I believe that a video camera to show the infractions on abuse of wild life and purity of trash. Recreational by several groups and limited to a few. This seems like discrimination. Leave this area alone. Leave as is for all.
936	If there is have a area protected maybe you should find a more populated place for protection. Not this area where there has been no changes in 50 thus years.
937	This exhibits discrimination to 95% of the public. The other 5% that would be allowed to use this area, canoes, kayakers, and rafters are the ones that show no respect for the river banks or wildlife.
938	I see no change needed. Nature made it the way it is. It is beautiful the way it is. Don't mess with Mother Nature.
939	Enforce regulations already on the books. No need to add new ones when the ones you have are not being enforced. BLM should keep an eye on this area, it would allow you to see who is throwing trash and pollutes the river.
940	Lack of cleaning up after one's self and lack of caring that someone else has to clean up after you. Lack of respect and consideration for wildlife and landowners.
941	The number of people in a party makes no difference as long as they respect everything.
942	The BLM has done its best to keep this plan as secretive as possible from the public for its own gain. This project needs to be forgotten and let the people, 100% of them enjoy the river and what nature has put there. Let the wildlife live in what they are used to and what nature gave them. Everyone, including the BLM, knows that this unreasonable and discriminating project will not stop where it starts. I feel that this is just a way to deprive the public and land owners make this a playground for a handful of groups. Again discrimination.
943	The BLM will eventually deter farms, ranches, fruit orchards, vineyards along with our organization which sense three children a year to Camp Wapiyapi which is a camp for children with cancer.
944	I am asking you to forget this project for the good of us all.
945	This plan for the San Miguel and Dolores River area is very disturbing to me. I strongly oppose any plan like this to our public lands which would revoke our freedom to use them.
946	Our country desperately needs a clean source of renewable energy and hydropower is a clean source. At the time we have no other real resources and until we get some and it becomes plentiful, our country needs gas, oil and mineral such as uranium.
947	Please! Do not restrict or revoke our freedom to use our public lands for clean responsible mineral extraction and please do not restrict our Uncompahgre BLM resource with a Wild and Scenic designation.

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948	I am writing this is support of maintaining the present RMP governing the San Miguel river. I do not believe that putting the section from Placerville to the Pinyon bridge into the "Wild and Scenic Rivers" act will benefit the largest amount of the river users and the public at large. Putting this section into the WSA really only benefits fisherman, rafters and tourists at the expense of the local water users and the domestic water supply for Nucla.
949	This all appears to be done with the intent to deny access to the claims utilizing any flimsy excuse that can be dreamed up by the BLM personnel. There seems to be a national trend in the BLM management to exclude local water rights and local water uses in favor of tourists, fishermen , rafters and other so-called eco-friendly groupies.
950	Please leave the San Miguel River alone, there is already enough regulations in effect as it stands.
980	Reams Ranch is opposed to such designation because of but not limited to reasons herein, including that Naturita Creek should not be considered eligible or suitable for WSR designation.
981	The Draft Wild and Scenic River Eligibility Report finds Naturita Creed to be a perennially flowing tributary of the lower San Miguel River, with no roads running parallel to it, two county road bridge crossings, two state highway bridge crossings, and one unimproved road crossing. The report also mentions water diversions along its reach, but no impoundments. Research finds adjudicated water and ditch rights dating back to 1897 (Maverick Draw Ditch) and water calls on Naturita Creek 11 times in the last 19 years. Evaluation of flaws should focus on normal water years with consideration of drought or wet years during the inventory. Naturita Creek dries up at least every other year. This segment does not contain regular and predictable flows therefore should render it unsuitable for designation under perennially flow. Although no information about easements in the Draft Report there are 4 powerlines crossing Naturita Creek and 2 crossing permitted, and one natural gas line. Naturita Creek is considered to be eligible for designation with a "scenic" classification. Criteria for scenic classifications: largely primitive and underdeveloped, no substantial evidence of human activity. Powerline easements and natural gas line easement should be considered a disqualification for "scenic classification."
982	This Draft Report finds "Fish" as an outstanding remarkable value. Three fish are named in the draft report, Flannel mouth sucker, Blue head sucker and Roundtail Chub; all on Colorado BLM state Director's Sensitive Species list (2000). Only one, Roundtail Chub is on CDOW's list and not as a statutory category (updated 6-12-2009). CDOW fish studies were requested from: Harry Vermillian, IT Pro II Governor's Office of Information Technology Aquatices Database Manager Colorado Division of Wildlife it appears occurrences are too irregular, transitory and/or dispersed to be reliably identified, mapped and be considered for ORV eligibility.
983	Approximately 60% of the 24.97 mile length considered remains in private ownership. The Act requires that the agency consider, among other factors in determining suitability (1) the current status of land ownership; (2) characteristics which would not make the area a worth addition to the National System; (3) the reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed or curtailed if designated; (4) the estimated cost to the United States of acquiring necessary interests from private landowners and of administering the area if designated. In this instance, the extensive private ownership, water diversions that dry up the stream channel, power and natural gas easements, irregular and unreliable fish occurrences, and the substantial cost of acquiring interest to foreclose such privately maintained uses if designated, justify the conclusion that Naturita Creek is not suitable for designation as a WSR.
984	Reams Ranch is opposed to inclusion of recommendations for designation as WSR of Naturita Creek. Reams Ranch opposition can be summarized as follows: - Perennially Flow - Naturita Creed has gone dry 11 of the last 19 years as a result of the 1897 water right "call." - Powerlines and natural gas easements - Identified easements existing within this reach disqualify this segment for scenic classification. - Fish - Lack of reliable and regular occurrences to be considered for ORV eligibility, along with the fact that only one (roundtail churb) is on CDOW's list and not as a statutory category. Taking all factual data presented at face value, there may not be an ORV to protect. - Ownership - Naturita Creek is predominantly privately owned. Sixty percent of the 24.97 mile river segment identified is owned privately. Designation as part of NWSRS would affect area use, including incompatible uses for the public on private lands. This designation would potentially create serious socioeconomic impact to the private land owner. It could curtail reasonably foreseeable potential uses of the land and related waters if the area were included in the NWSRS. Historical existing rights such as adjusted water rights, mineral extraction rights such as gravel pits, stone, oil, gas and coal, rights of the private land owner could be adversely affected. Scenic easements through private property would encumber the existing regular use of the private land owners such as grazing, irrigating, farming and hunting. Significant potential for

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	jurisdictional disputes over administrative roles and or presence in an area predominantly privately owned exist.
985	In addition after careful review and consideration of such designation which has no specific management tools to be utilized, such as condemnation, unfairly act to cloud the title of private land owners within the designated area and negatively impacts Reams ranch property rights. As such Reams Ranch suggests that the BLM should find Naturita Creek to be ineligible and/or unsuitable for designation as Wild and Scenic Rivers, and remove recommendations for the same from all pending or future Draft land Management Plans.
987	We take better care of our claims area and the river than thereafter and kayakers. And our mining activities do not interfere with them.
988	I do not believe that putting the river area that we lose into the "Wild and Scenic Rivers" Act will benefit the public at large.
989	I'm 67 years old and a native of Western Colorado and I think that I should have a right to enjoy the water areas in question without somebody telling me that I can't.
1014	As the owner of a BLM mining claim on the San Miguel River above the Pinyon Bridge, I find it unbelievable that you do not have anything in your brochure about prospecting on the river and have not included our interest in any of the findings.
1015	Please take the time to familiarize yourself with our group and understand what we do.
1021	Three pictures with the following captions: Ducks on the San Miguel in Placerville, Colorado American Dipper on the San Miguel River Eagle along the Delores River
1022	I am writing in support of designating the parts of the San Miguel and Delores Rivers that are being considered as Wild and Scenic. These rivers are truly a great part of the heritage of this area and they are so unique with their wildlife and with their views...absolutely awesome views and absolutely awesome wildlife. And they are so unique rivers rolling though these mountains and canyons. The wild life and the views are just SO outstanding THAT THEY need to be preserved for future generations. I would send you lots of photos in support of my stand for I am a great fan of these awesome rivers and have photographed extensively for our great outdoors is a gift. I am so, so, so fortunate to be able to photograph along the rivers!
1023	The rivers need this protection to keep them healthy and keep them out of some commercial venture for personal profit (such as the experimental water playgrounds for kayakers where tons and tons of cement is poured in our rivers so a few elite folks can "play" on their toys in the river!).
1024	The wildlife along the rivers is so unique.
1025	The canyons are so unique as in the red soil of the San Miguel River Canyon from Deep Creek onward
1026	The San Miguel is used for awesome fly fishing from April thru November (if the snow doesn't interfere!).
1027	The San Miguel is used for awesome fly fishing from April thru November (if the snow doesn't interfere!). The river is a place to just pull over such as one can do in the county parks along the San Miguel and just breath some fresh air, listen to the river and be among the beauty of the river.
1033	I am an owner of a placer claim on the San Miguel River above the Pinyon Bridge. I wanted to write and let you know about the good things I am doing to improve the river and the quality of the fish population. Not only do I remove lead from the river, I remove old mercury from 1900 mining habits.
1034	By creating temporary fish gabions there is a better area for fish to spawn.
1035	I also clean the campground areas and am a good steward of the river.
1045	Do not designate any segment of the San Miguel/Dolores river as "wild and scenic". This river does not flow enough water consistently throughout the year to even allow access to it. We feel this steals the rights of ownership of land owners bordering the river and endangers the existing water rights of citizens. The river is what it is, whether it is designated by a government agency to be "scenic" or "wild". The only reason to designate it as so, is to take rights away from people who own them and to redistribute them. We do not have the infrastructure to support more people. Designation of this sort should be for rivers with consistently higher flow rates and near more populated areas to benefit more people with less environmental impact.
1050	It is my understanding that the San Miguel River provides irrigation for fanners and ranchers in the area. Having grown up on a farm near Cortez, CO, I can understand how disruption of a water supply is lethal to

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	agriculture, especially here in the arid West. Agriculture is a marginal enterprise at best, but BLM has historically worked closely with farmers and ranchers in any manner they can. I would like to see this support and cooperation continue. I think the question needs to be asked as to whether destroying dams and ditches, thereby depriving farmers and ranchers of an asset (water rights) is moral or legal. Does it conflict with Colorado Water law, since water laws in Colorado are not riparian? If this area is designated in the WSR, it will narrow multiple use of the area by the people. i.e., gold mining hobbyists would be prohibited from filing claims for their various clubs. The public lands should be for the use and enjoyment of all people, not just a few chosen groups.
1051	There shouldn't be any changes made physically to the landscape. One reason it is even being considered to be part of the WSR is because of its beauty. Why would we want to modify it? If it is included in WSR, the dam and ditch that provides water to farmers and ranchers would have to be destroyed. Along with it, their livelihood would be destroyed. It should be left as it is.
1052	BLM 's resources are already strained without adding this additional administrative and management responsibility. At a time when the national economy is in shambles, additional personnel and money may not be available to BLM field offices. To put it bluntly, the local field offices do not need to have more duties piled on. Although it is the responsibility of BLM to care for and safeguard our public lands, it would be better to keep it manageable than to add more and more until all of it becomes unmanageable. Plus this let's be honest. Don't we already have enough rules, laws, regulations and restrictions?
1054	Presently the ACEC & SRMA management plan protects the habitat, the river, and the public land users. Due to the nature of Colorado Water law, putting the river under WSRA may open a contingency of problems not foreseen. While there may be tributaries that should be placed under WSRA, this section of the San Miguel does not need to be included in it.
1083	Regarding the change in management of the San Miguel River and Dolores River corridors I fret that going to a scenic or more may be too restrictive. The potential loss of private property rights would be costly to a large number of people. The recreational value would not be increased and the scenery cannot be improved. Keeping the management as it has been would be best, I feel.
1084	I'm writing today because I'm concerned about the law passing that would make the Gunnison river wild. This would negatively impact Escalante ranch and everyone who works there. Several homes would have to be removed and several jobs would be lost. All so people floating down the river don't have to look at the homes of people who work for the ranch. That doesn't sound right to me. Some places along the river are used for agriculture and ranching and have been for a long time. And to try to change that is not very realistic. In my opinion, the Gunnison river is wild enough.
1110	The Wild River commitment is ridiculous. I love this the way it has been done historically why all the changes now! Forget this thought now!! I object to this Wild River plan.
1111	My comments are with the Wild and Scenic River issue. I'm completely against the proposal. Leave the San Miguel River like it's been in the past. Weimer Ranch owns land on both sides of Dolores River at Mesa Creek.
1112	Due to the nature of the canyon width along with the river, there is no room for any landscape changes. Any time you disturb the soils you introduce weeds.
1113	Keep the river on the multi-use concept.
1114	Weimer Ranch is completely against the instream flow.
1115	My concern is regarding the BLM's misrepresentation of Dry Creek (Hydrologic Unit - San Miguel River Section 15) Dry creek is not free flowing It is a dry creek bed 90% of the time in a normal year. The other 10% it is a flash flood, dry in 3-4 days! If you move sage grouse here they will die of thirst! The BLM even refers to it as "intermittent" then later refers to the area as having "low precipitation."
1116	For this area to be considered "wild" it should not contain a uranium mill reclamation site, as it is far from scenic. The scenic geological features will not be changed or harmed by leaving the area open to the public. Hecla mining at the south end of the valley.
1117	I would leave the area as it is. The public uses the area for hunting and OHV use.
1118	There is no sage grouse population here, but if there was, then I would halt importing predators such as the lynx, and I would permit trapping of larger predators such as coyotes.

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1119	The dry creek area is inherently remote. Access is limited to ORV's and hikers. I would not pave any roads to the area, nor would I limit access in anyway, as the existing users are few, and season, ie hunters and cattle ranchers.
1120	Please consider the economy of Nucla/Naturita area before limiting our resources. We live off of mining and cattle and cannot remain self-sustaining with our lands and rights (to hunt, water rights) given to the Government.
1122	Current landowners and land use do not interfere with public use and enjoyment of these water systems, as we personally witness hundreds of people every year partaking in recreational activities in and around these areas.
1123	It must be recognized that a substantial number of hard working American citizens will lose their jobs and their homes as a direct result of this pursuit. Furthermore, adjacent land, landowners, and land use which will be affected, currently support our nation's agricultural production and food supply. Be it known that I believe it is wrong to hinder and intrude upon tax-paying citizens, causing them to uproot their children who are settled in local school systems and communities, forcing these families into unemployment and out of their homes. The area of contention is not a wilderness area, but an area of residents and livelihood. Including the above named waterways in the WSRA, will rob 11 families, just of Whom we know personally, of their incomes and homes; notwithstanding, numerous others who also reside and earn a living along these waterways. I strongly oppose any such threat, now or in the future, to these US citizens.
1186	We agree with the preliminary classifications as stated in the draft report and think the report accurately represents the values found along the river and its tributaries, as follows: • Beaver Creek: 14.25 miles: Classification -Scenic: Outstandingly Remarkable Values -Vegetation. • Dry Creek: 10.49 miles: Classification -Wild: Outstandingly Remarkable Values -Scenic, Geologic, Wildlife. • Fall Creek: 5.56 miles: Classification -Recreational: Outstandingly Remarkable Values -Wildlife. • Naturita Creek: 24.97 miles: Classification -Scenic: Outstandingly Remarkable Values -Fish. • Saltado Creek: 5.56 miles: Classification -Wild: Outstandingly Remarkable Values -Vegetation. • San Miguel River, Segment I: 27.23 miles: Classification -Recreational: Outstandingly Remarkable Values -Scenic, Recreational, Wildlife, Historic, Vegetation, Paleontology.
1187	We are pleasantly surprised to have this opportunity to support the possibility of wild and scenic status for portions of our home river.
1218	I am submitting comments on the Wild and Scenic River Eligibility Report ("Eligibility Report") of the Resource Management Plan ("RMP") for the Uncompahgre Field Office (UFO) on behalf of the Colorado River Water Conservation District ("River District"). The River District appreciates the opportunity to comment on this important piece of the RMP and, in particular, on feasible management alternatives to the eligibility of segments of the Dolores, Uncompahgre, North Fork of the Gunnison and Gunnison Rivers pursuant to the Wild and Scenic River Act ("WSRA") in the UFO.
1219	Because the River District is charged with conservation, use and development of the water resources of the State of Colorado, we are concerned about the potential that the Eligibility Report and an eventual WSRA Suitability Report ("Suitability Report") might adversely impact our constituents', ability to put water to beneficial use. Therefore, we urge that great caution be used in the process to potentially designate rivers in the Gunnison River Basins under WSRA, and that management alternatives to WSRA be explored and implemented. Historically, the WSRA process has been contentious due to potential impacts to private property rights (water and land), water supplies and related facilities. Although the River District recognizes the need to provide protection for the values that Wild and Scenic designation offers on selected rivers and streams, we believe there are better and more cooperative approaches that may be employed. Our principal concern is that designation, or even eligibility or suitability determination, pursuant to WSRA may be too stringent and restrictive and may reduce critical flexibility to meet future water demands in the Gunnison and Uncompahgre River basins. The Colorado General Assembly and State water users have spent considerable time, effort and money ensuring that Colorado's water law system contains sufficient flexibility. The state's instream flow and recreational in-channel diversion programs are excellent examples of this flexibility. We believe the BLM should employ these approaches first to protect potential Outstandingly Remarkable Values ("ORV") and/or to achieve the desired management objectives. Because the Gunnison River system is already over-appropriated (meaning there are more demands than naturally available supplies), we cannot afford to lose

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	flexibility in the system. Therefore, we encourage the BLM to act cautiously, by not designating as eligible, nor as suitable, all of the segments included in the Eligibility Report.
1220	In our opinion, there are two categories of river segments in the eligibility report: 1) Those river segments that are not eligible for designation due to a variety of factors (e.g., appropriateness and/or manageability); and 2) Those river segments that have ORVs but where those values should be protected using strategies other than WSRA designation. In addition, the River District further examined the segments included in the Eligibility Report based on whether the segments are appropriate and manageable for purposes of the WSRA and divided the segments into the following categories: A.) Segments with non-federal water rights that will likely be impacted by designation; B.) Segments that are too short (one mile or less); C.) Segments whose flows are predominantly determined by releases from upstream reservoirs; D.) Segments where private lands predominate; and E.) Segments that may need some level of protection but for which designation is not appropriate and for which alternative management should be employed. We have applied these categories to the list of segments of the Eligibility Report and discuss our specific recommendations below.
1221	Nearly all segments have water rights, both perfected and conditional rights including both direct diversion and storage rights within, or proximal to, the proposed segments. The River District is willing and able to assist with the identification and disclosure of these rights and the associated segments. It is, however, beyond the scope of our resources at this time to identify all such water rights and meet the deadline for comment.
1222	Although we recognize that there is no length requirement to designate a river as Wild and Scenic, there are many segments listed in the Eligibility Report that are exceptionally short and non-contiguous. In our opinion, such segments are not manageable and do not meet the goals of the WSRA and therefore should be removed from the Eligibility Report and dropped from further consideration and study. These exceptionally short segments include: • Gunnison River, Segment 2 (BLM segment 13.02 miles and private segment 2.59 miles) • Escalante Creek, Segment 1 (BLM 5.75 miles and private 2.69 miles) • Escalante Creek, Segment 2(BLM 0.90 miles and private 5.07 miles) • Deep Creek (BLM 0.58 miles and private 1.97 miles) • West Fork Terror Creek (BLM 0.47 miles and private 0.74 miles) • Dry Fork Escalante Creek, Segment 2 (BLM 2.43 miles and private 0.46 miles) • Rose Creek (BLM 3.9 miles) • North Fork Mesa Creek (BLM 5.81 miles and private 2.72 miles)
1223	Free-flowing is defined by Section 16(b) of the WSRA as "existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping, or other modification of the waterway." While the River District understands that the existence of small dams, diversion works, or other minor structures at the time the river segment is being considered does not automatically disqualify a segment, we believe that the dominant influence on flows from large upstream impoundments should disqualify segments from further consideration. Downstream calls and deliveries of water to water users downstream typically control the release schedule of reservoirs in Colorado. These releases are made pursuant to state law and reservoir operators have little discretion about the quantity or timing releases. The River District urges the BLM to drop such segments from the eligibility report since the BLM will have no control over the releases or flows through these reaches. The following segments should be deemed ineligible and not studied for suitability due to the presence of significant upstream water control facilities: • Gunnison River Segment 1 • Gunnison River Segment 2
1224	Many of the proposed segments in the Eligibility Report include non-contiguous segments that are adjacent to, or isolated by, large parcels of land that are not owned or managed by the BLM. The River District believes such segments are impractical, if not impossible, for the BLM to manage. Designation of such small, non-contiguous segments will inevitably lead to unnecessary conflicts in federal/non-federal land use and management. Therefore, the River District requests that the following segments not be considered eligible and removed from further study: Escalante Creek, Segment 1; Escalante Creek, Segment 2; Deep Creek; West Fork Terror Creek; Dry Fork Escalante Creek, Segment 2; Gunnison River, Segment 3; Roubideau Creek, Segment 2; North Fork Mesa Creek
1225	Many of the segments identified as eligible may be appropriate for alternative management plans in lieu of designation or determination of suitability. We believe this is particularly true of all segments which lie within the Dominguez-Escalante NCA. In addition there are 4 segments in the Lower Gunnison which would benefit from an alternative management plan. • Monitor Creek • Potter Creek • Rose Creek • Roubideau Creek,

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	Segment 14 While we believe these segments may deserve some level of protection for their ORVs, we strongly recommend that the BLM find alternative mechanisms for this protection. Such alternative management approaches have been successfully employed on other streams and rivers in Colorado and, in fact, the BLM is actively developing an alternative management program for mainstem reaches on the Colorado River upstream of the Grand Junction area. Another example of an alternative management is the South Platte Protection Plan ("SPPP") that the U.S. Forest Service created in the Upper South Platte River basin in lieu of Wild and Scenic designation. The SPPP provides benefits and protection while maintaining flexibility for water supply operations and potential future development. The SPPP was developed cooperatively with multiple stakeholders. The River District supports a similar approach on the Gunnison, Dolores and Colorado River mainstems and will be convening a group of stakeholders to explore this possibility. For these reasons the following segments should be managed outside of WSRA and thereby be removed from the eligibility list and not be considered for suitability: • Big and Little Dominguez Creeks • Dry Fork Escalante Creek, Segment 2 • Cottonwood Creek • Escalante Creek, Segment 1 & 2 • Roubideau Creek In summary, due to the success of alternative management processes and the multiple demands and highly regulated nature of most of the segments in the Eligibility Report, the River District strongly recommends the BLM work with local stakeholders to create and adopt alternative management strategies, such as the SPPP, to protect the ORVs of the listed segments without the inflexible strictures of the WSRA. As with the Upper Colorado and GJFO stakeholders processes, the River District is committed to participate in such a process for the UFO.
1226	In addition, due to the political sensitivity related to this issue, we recommend that the BLM UFO proceed with caution and keep water users well informed regarding the process as the BLM moves forward with the RMP and WSRA processes.
1232	The CWCB has a substantial interest in the efficient management and wise administration of the river segments inventoried and evaluated in the Draft Report. The CWCB is authorized to, among other things, "cooperate with the United States and the agencies thereof ... for the purpose of bringing about the greater utilization of the water of the state of Colorado ...," and "to confer with and appear before the officers, representatives, boards, bureaus, committees, commissions, or other agencies of ... the federal government, for the purpose of protecting and asserting the authority, interests, and rights of the state of Colorado and its citizens with respect to the waters of the interstate streams in this state." Furthermore, the CWCB has the exclusive authority to appropriate instream flow water rights, and its Instream Flow Program has proven to be very successful, protecting over 8,500 miles of streams and 480 natural lake levels in Colorado. The BLM has successfully relied on this program in dozens of situation to protect water resources located within or adjacent to BLM lands.
1233	The CWCB appreciates the Draft Report's express acknowledgement that the eligibility analysis is an initial phase of the Wild and Scenic River investigation, intended to identify the BLM's opinion regarding the free-flowing nature and outstanding and remarkable values of the inventoried river segments. Although the CWCB may dispute or disagree with some of the BLM's findings in the Draft Eligibility Report if it conducted its own field investigation and review, the CWCB recognizes the Draft Report is the result of a federal administrative inventory and evaluation that will undergo further impact analysis, consultation and coordination with interested stakeholders during the suitability phase.
1234	The CWCB appreciates the Draft Report's commitment to collaborating with non-federal stakeholders during the suitability phase of Wild and Scenic River analysis for the Uncompahgre Planning Area and portions of the Dominguez-Escalante National Conservation Area. The CWCB has been and continues to be actively involved in a number Of non-federal stakeholder groups coordinating with the BLM and US Forest Service as appropriate urging the suitability analysis for stretches of the Upper and Lower Colorado River, the Do ores River, and the San Juan River basins. These stakeholder efforts are attempting t develop management plans to protect the values associated with the various segments, as identified by the federal agencies as being eligible for wild and scenic rivers designation, while allowing Colorado to fully use its entitlements under the Colorado River and Upper Colorado River Basin Compacts. Between 2007 and 2009, the CWCB was also able to provide resources and funds to explore reasonable and acceptable alternatives to wild and scenic designation by federal agencies. The CWCB looks forward to a similar collaboration, to the extent resources are available, during the suitability phase of the Wild and Scenic River investigation for the Uncompahgre Planning Area to furthest evaluate the eligibility classifications of the inventoried river segments and identify whether and to what extent there are plausible alternatives to designation of eligible segments as suitable.
1235	The CWCB recommends the UFO coordinate with the San Juan Public Lands Center, the Dolores River

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	Dialogue stakeholder group and Lower Dolores Plan Working Group when conducting the suitability analysis for the Dolores river segment within the UFO's jurisdiction. These entities have been working together for the past 24 months to identify potential methods for securing needed protections of the outstandingly remarkable values without limiting reasonable water development along the Dolores River segment between McPhee Dam and Bedrock, Colorado. The UFO should incorporate and build upon these past and ongoing consultations to develop consistent management strategies for the contiguous stretch of the Dolores River.
1236	The Comments provided herein focus on the primary interests of the CWCB with regard to the Draft Report. Lack of additional comments should not be construed as agreement with or an admission of all factual and legal assertions made therein. Nor should silence on factual and legal characterizations in the Report be deemed a waiver of any of rights for the purposes of any future legal, administrative, or other proceeding.
1237	Finally, the CWCB would like to thank the BLM for its efforts in developing the Draft Eligibility Report and willingness to consult the public before finalizing it. This has not occurred with all other Eligibility Reports issued by different BLM field offices, and we appreciate this opportunity to comment. We look forward to continuing our excellent relationship with the BLM on water rights issues during the next phases of the Wild and Scenic investigation for the Uncompahgre Planning Area and portions of the Dominguez-Escalante National Conservation Area.
1258	Energy Fuels Resources Corporation (EFRC) welcomes the opportunity to comment on the Draft Wild and Scenic River Eligibility Report. Our main concern stems from the fact that any stream segments deemed 'eligible' will be afforded protection during evaluation for 'suitability'. We believe a few of the segments should not be considered eligible for a variety of reasons. The main reason for most of these segments not qualifying, in our opinion, is they lack Outstandingly Remarkable Values (ORV). Even though we appreciate the scenic aspects of the area and our employees enjoy recreation in the region, we do not agree that the segments in question meet the criteria of unique, rare, or exemplary, nor are they significant within the region of comparison. Furthermore, we notice numerous inconsistencies in the reasoning for the classification used from one segment to another
1259	Segment 15-Dry Creek: This 10.4 mile section is too long to include. There is nothing unique (scenic or geologic), except only 2 miles (where it crosses the anticline). Even though the full segment 'may provide' habitat, that does not make it unique
1260	19-San Miguel River Segment 1: This section certainly does not qualify as Scenic, being highly impacted by numerous houses, roads, and power lines. It does not need 'designation' to allow for the current level of recreation. This segment is already included for protection in the San Miguel ACEC, therefore it does not need designation for vegetation. The geologic description of the Morrison Formation is poor resulting in overstating the paleontological significance-this outcropping is not unique nor have any significant fossils been found.
1261	21 San Miguel River Segment 3: No need for designation here since it is already protected in the Cottonwood Creek Conservation Area. It does not meet the criteria of 'scenic' since it has roads, power lines, irrigation diversions, and it becomes nearly dry during summer.
1262	22 San Miguel River Segment 5: Land ownership of this segment is so fragmented it will make management impractical. The 'historic' aspect is no longer a qualifying criteria since the entire 'historic' value has been completely reclaimed-there is nothing left to see. The Hanging Flume historic evidence is all downstream of Atkinson Creek. Although vegetation is mentioned in the study, the noxious tamarisk is not. There are historic and active uranium mining properties on the cliffs above this segment on both sides. Remaining reserves and the U.S. need for increasing its reliance on domestic supplies of uranium for nuclear power generation should make the mineral value of this and other similar segments more important than the non-unique scenic value. The fishes listed are all non-game species, therefore of limited recreational value.
1263	23 San Miguel Segment 6: The rationale for designation here is sound. However, designation must not lead to any road closures. Same mining aspect as Segment 5.
1264	26 Dolores River: The description of this segment does not include any mention of the past gravel mining, nor the uranium-vanadium mining obvious along the banks and adjacent cliffs. All these deposits have the potential to resume production. This needs considered in connection to the scenic designation. The geology here is not unique in that the incised meanders continue for many miles downstream and the exposed stratigraphy covers many hundreds of square miles in the region of comparison.
1265	27 North Fork of Mesa Creek: The road near the stream for much of this segment is the only truck route for

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	ore haulage from mines in the upper part of this and adjacent basins (Blue Mesa, Outlaw Mesa, Calamity Mesa, and Tenderfoot Mesa) as well as a few in the lower part of the Mesa Creek. Any designation here cannot preclude this access.
1266	28 Dolores River Segment 2: When discussing scenic values, the BLM mentions 'exceptional views of the adjacent scenery' for this and other segments throughout the report. Our concern (also mentioned above in #22) is the possible restriction of future mining on the mesa edges outside the designation (i.e. greater than ¼ mile) if they can be seen from the segment. The stratigraphy is not unique within the region. From the recreation standpoint, boaters-use in this reach is extremely rare because of the slow flow and their use will be unaffected, regardless of designation. The vegetation is not unique, as the report mentions similar vegetation on most segments discussed.
1267	29 Ice Lake Creek: An access road to uranium mines is less than ¼ mile from the stream for part of this segment. The scenic aspect is impacted by mines on the cliffs easily visible across La Sal Creek, to the south. This classified as scenic is inconsistent with similar segments (#30 and #34 being recreation while #33 is classified as scenic, but for different reasons).
1268	30 La Sal Creek Segment 1: The fishes listed are mostly not game fish, so they do not impart the recreation aspect mentioned. Almost the entire length of this segment is private land; this fragmentation makes it unmanageable if classified recreation. The scenic aspects are not mentioned, as with Ice Lake Creek, with or without respect to the uranium mines.
1269	31 La Sal Creek Segment 2: This is the only access to the Cashin Mine on private land. The rest of La Sal Creek downstream has all the same criteria mentioned for this segment and is already protected in the Dolores WSA.
1270	33 Lion Creek: The only ORV is vegetation, yet is classified scenic, in spite of the area being impacted by past uranium mining. As mentioned above, this area is likely to see renewed mining activity soon.
1271	34 Spring Creek: Again, there seems to be a stretch in the search for qualifying criteria and inconsistencies with similar areas in an attempt to include this and other small segments. The description is almost the same as Lion Creek (#33) but the classification is recreation rather than scenic.
1272	To summarize, EFRC requests the BLM to reconsider the inclusion of the above listed segments as 'eligible'. It is believed they do not meet the requirements of 'suitability'. Since they will be managed as if already designated during the suitability review, there is concern that other legitimate activities will be unnecessarily limited or prohibited.
1276	More importantly, the WSRA does not list "vegetation" as an ORV. Id. While the WSRA does permit ORVs which are "similar" to the ORVs expressly listed in the WSRA, nowhere does the BLM's report specifically link the presence of the particular vegetation found within this creek segment, or more particularly found on Mr. Miller's private land , with an expressly stated ORV. 16 U.S.C. § 1271; Report at 26. The BLM cannot arbitrarily create new ORVs which are not found within the WSRA. At a minimum, the BLM must explain how the presence of the particular vegetative community in question, which must be present specifically on Mr. Miller' s private property, is "similar" to an expressly permitted ORV category, and why such vegetation qualifies as "outstanding." Moreover, even if the specific vegetative community at issue could qualify as an ORV, then the fact that Mr. Miller's half mile of stream segment is wholly in private ownership and control would make it impossible for the BLM to manage said vegetation, thereby precluding the land from suitability as a WSR. BLM guidance states that the: Status of land ownership .. . including the amount of private land involved ... must be taken into account to the extent that management would be affected. In situations where there is limited public lands (shoreline and adjacent lands) administered by the BLM within an identified river study area, it may be difficult to ensure those identified outstanding remarkable values could be properly maintained and afforded adequate management protection over time. Accordingly, for those situations where the BLM is unable to protect or maintain any identified outstanding remarkable values, or through other mechanisms (existing or potential), river segments may be determined suitable only if the entity with land use planning responsibility supports the finding and commits to assisting the BLM in protecting the identified river values. BLM Manual 8351 -Wild and Scenic Rivers at § 0.33(A)(2). In this case, there is no legal mechanism whereby the BLM could manage or control vegetation use on Mr. Miller's private land. Mr. Miller could, for example, cut for firewood any of the commonly found Fremont cottonwood trees found thereon.
1517	Please do not restrict our Uncompahgre BLM resources by a Wild and Scenic designation or closure through the Resource Management Plan.

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1518	Hydropower is a clean source of renewable energy which our country desperately needs.
1527	Gold prospecting by panning, high banking, and dredging have been occurring on the San Miguel River for many decades. Currently it has an important recreational value to the community. Every weekend prospectors from the local communities and occasionally prospectors from out of state seek gold on many sections of the River. We do this for many reasons: 1. the recreational value, 2. enjoyment of the outdoors, 3. the exercise, 4. for profit. Please do not impact our abilities to prospect for gold or other metals by this planning process.
1528	In addition, as mining on federal lands is a federal statutory right and a mining claim is site specific, blanket closures could constitute a physical property takings.
1529	I would prefer the San Miguel not be designated a Wild and Scenic River but if it is the recreational classification would be the only acceptable designation.
1531	Suction dredging produces excellent spawning habitat by breaking up hard packed material and depositing it as loose gravel. The holes I have dredged are generally occupied by fish the following day as areas of protection from the current. However the holes are refilled every year by spring runoff.
1532	Below I have provided references to studies concerning the effects of suction dredging on fish and aquatic species that should be taken into consideration in the planning process. The following are a few quotes to summarize their findings: The California Department of Fish and Game (CDFG, 1997) concluded, "Suction dredging can have significant short-term and localized adverse impacts on local benthic invertebrate abundance and community composition. However, over the long-term, the impacts appear to be less than significant. Colonies of invertebrates generally re-colonize areas disturbed by suction dredges within a relatively short period of time ranging from one to two months." "Impacts to benthic invertebrate communities of suction dredging with 6 inch or smaller sized nozzles appear to be less than significant." "Effects to benthic and/or invertebrate communities, turbidity and water quality appear to be less than significant. They are usually localized and temporary in duration." A U.S. Army Corps of Engineers study on suction dredge mining found de minimus impact on aquatic resources and provided "official recognition of what suction dredgers have long claimed: that below a certain size [4 inches], the effects of suction dredging are so small and so short-term as to not warrant the regulations being imposed in many cases." A recent 2003 study by Peter B. Bayley, Response offish to cumulative effects of suction dredge and hydraulic mining in the Illinois sub-basin, Siskiyou National Forest, Oregon, concluded: "The statistical analyses did not indicate that suction dredge mining has no effect on the three responses measured, but rather any effect that may exist could not be detected at the commonly used Type I error rate of 0.05. The fact that the analysis was able to detect a negative effect of another mining process, HM, on native salmonids, is an indication of the long-lasting effect that hydraulic mining has had on the environment, particularly on riparian zones and floodplain sections in geomorphically unconstrained reaches." "The reader is reminded of the effect of scale. Localized, short-term effects of suction dredge mining have been documented in a qualitative sense. However, on the scales occupied by fish populations such local disturbances would need a strong cumulative intensity of many operations to have a measurable effect..." Attached is a list of additional studies that have been done concerning the effects of suction dredge mining on fish and aquatic species.. The following are a few quotes to summarize their findings: "The results from Resurrection Creek indicated that there was no difference in the macroinvertebrate community between the mining area and the locations downstream of the mining area in terms of macroinvertebrate density and taxa richness. The sampling was done 35 days after mining had been completed for the season and shows a rapid recovery of the mined areas." (The U.S. Environmental Protection Agency - 2001.) "Dredge tailings are often referred to as good salmonid spawning substrate. In the Trinity River, chinook salmon have been observed spawning in the tailing piles of suction dredges (E. Miller pers. comm.). Steelhead in Idaho streams have been reported to spawn in gravels recently disturbed by human activities (Orcutt et al. 1968). In the American River , Prokopovich and Nitzberg (1982) have shown salmon spawning gravels have mostly originated from old placer mining operations." (Hassler, Somer & Stem 1986) "Anadramous salmonids held and spawned in Canyon Creek in close proximity to suction dredge activity. During the 1984-1985 spawning season, fall-run chinook salmon, coho salmon and steelhead spawned in areas actively dredged during the 1984 dredge season (fig.). In August 1985, spring-run chinook salmon and summer-run steelhead were holding near areas where suction dredges were being operated (fig. 23). During the 1985 spawning season, fall and spring-run chinook salmon spawned in areas actively dredged during the 1985 dredge season (fig. 24)." (Hassler, Somer & Stem 19861
1547	I am writing this in support of maintaining the present RMP governing the San Miguel river. I do not believe that putting the section from Placerville to the Pinon bridge into the "Wild and Scenic Rivers" act will benefit the

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	largest amount of the river users and the public at large. Putting this section into the WSR really only benefits fishermen, rafters, and tourists at the expense of the local water users and the domestic water supply for Nucla.
1548	I am a member of the Colorado GPAA prospectors club from Olathe. We have several claims in this area. We have tried to find out what changes to our claims that the WSR designation would cause. We have not received any concrete answers to our questions, only ideas and "maybe this or that could occur" types of answers.
1550	We maintain that responsible prospecting does not harm the public land and water ways. Our club has a strict code of ethics which we follow and which you can see at: www.wescogpaa.org. We actually take better care of our claim lands than the vaulted fishermen and rafters. After the rafting season is over in the area from the diversion dam down to the Pinon bridge we have to clean up their trash and human excrement that they leave.
1551	Our mining activities do not interfere with other users. Most mining occurs after the diversion dam diverts 90% of the river water, when that section is not used by rafters or fishermen.
1552	I am attaching some references to research that shows that suction dredging does little harm to fish and gravel spawning beds. Also I have attached an article from the ICMJ magazine about Oregon Suction Dredging which shows the standards that the Army Corps of Engineers uses to evaluate suction dredging. Also on page 22 of your 1989 San Miguel River ACEC & SRMA RMP Amendment it states that "Within the past ten years placer mining activity has had little effect on the section of the river from Deep Creek, downstream to Horsefly Creek."
1554	I completely disagree with this effort to put so much water and land off limits to Coloradoans just to keep tourists and PC politicians happy. That would be a poor decision on your departments part.
1555	In conclusion, I would rather that your group left most of the mainstream of the San Miguel out of the WSR designation and continued to manage the resource under the present ACEC and SRMA. I do not see a good reason to change the status quo for that section of the river from Telluride to Naturita. It is protected well enough as things stand now. Don't create more problems by changing the status of the river.
1556	Do not take any action that would adversely affect our ability to pursue placer mining on the San Miguel River.
1559	Mineral development. including pipelines and other infrastructure should be managed responsibly to minimize resource conflicts. The Mining Law of 1872 provides the legal framework (rights) for mining and prospecting activities on public land. Small-scale placer miners on the San Miguel River do not present a resource conflict.
1560	Public lands, especially in the Pinion Bridge area of the San Miguel River, should remain open to placer gold prospecting; this activity does not conflict with other land uses.
1564	Special conditions of approval should not be placed on mineral development because existing regulations would make such conditions redundant and unnecessarily cumbersome.
1566	There are visual considerations with respect to public land use. That is one reason I am a proud member of the Western Colorado Chapter of the Gold Prospectors Association of America. Our club members adhere to a code of ethics that obligate us to leave the land better than we found it. Please see www.wescogpaa.org to review this code in detail.
1567	Mineral development provides exceptionally positive social and economic effects and should be facilitated. Current regulations present more than enough restrictions. Planning decisions to facilitate the development of mining operations present significant positive opportunity for communities in southwest Colorado. Please do not restrict us from the right and heritage of placer mining.
1585	The purpose of this letter is to voice my strong support of maintaining accessibility, and usability of our public lands. As a citizen prospector, I strongly oppose any designation to public lands that would inhibit our freedoms to utilize them in the American spirit we both know very well: "with liberty and happiness." As your office works through the Resource Management Plan process for the Uncompahgre planning area, we strongly and sincerely urge you: do not further restrict our ability to prospect on our public lands!
1587	Of specific interest to me and many others, the San Miguel river, especially the Pinon Bridge area, should remain open to placer gold prospecting. We are acutely concerned that your office may be preparing to designate this area such that our liberty to enjoy the spirit, heritage and traditions of our gratifying hobby could be restricted.
1589	Responsible prospecting is not detrimental to public lands. As a member of the Western Colorado Chapter of

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	the Gold Prospectors Association of America, my fellow club members and I are bound by a strict code of ethics that evidences our commitment to responsible land stewardship. Further, it has been demonstrated repeatedly that suction dredging enhances the biological viability of waterways.
1590	Please take a moment review our code of ethics at www.wescogpaa.org. Put simply, if we do not follow club rules we are not allowed the privilege of prospecting club claims. We have good reason to believe our club members take better care of the area than the public at large -by virtue of our demonstrated integrity, not governmental restriction.
1591	Prospecting does not interfere with other land uses. Most waterway prospecting occurs after water levels have receded to the extent rafting, kayaking, fishing and other activities are not practicable or otherwise out-of-season.
1592	Protect and maintain our freedom. Allow prospecting on our public lands.
1611	I am writing to oppose the plans that the BLM is wanting to make the rivers around here a very limited use situation. That is not the best interest of all the people that live here in Colorado. Especially the ones that work and actually mostly support the income of these Government and State agencies.
1625	The Dolores river and all its eligible tributaries should receive immediate, thorough, and enduring protection. Previous findings of wild and scenic suitability for the Dolores River should be reaffirmed in the plan update. Few streams boast the unique natural values--and extent of threats to those values--as are found along the Dolores River.
1683	Work for Wilderness designation for the five Wilderness Study Areas (WSAs) in the UFO: Camelback, Adobe Badlands, Dolores River Canyon, Sewemup Mesa, and Tabeguache Creek Area.
1690	Wild and Scenic Rivers: Please protect as many eligible rivers and tributaries as possible. All of the river segments listed in the BLM's draft Wild & Scenic Rivers Eligibility Report should retain their eligibility for inclusion in the National Wild and Scenic Rivers System, and should be carefully evaluated for the next level of protection.
1729	San Miguel River section from the irrigation diversion dam near Horsefly Creek down to the Pinon bridge. I do not believe it should become part of the WSR system for several reasons: 1. The river bed below the diversion dam is almost dry from June to November due to local water needs. 2. Presence of a 30" trans-Colorado gas pipeline crossing under the river near the diversion dam. 3. Overhead power line crossing about a quarter mile upstream (S) of the Pinon bridge. 4. A road extending up the east side of the river that is used to access and maintain: 2 campgrounds, the diversion dam, the gas pipeline, the power line, private land alongside the river, and the water ditch. 5. A water ditch (CCC ditch managed by Mustang Water) that runs from the dam along the east side of the river above the road for this entire section of the river. Ditch is inside the WSR 114 mile river bank zone. 6. Presence of extensive old placer mining activity above the Ledges Campground done in the 1950's. 7. Negative effects that the WSR designation would have on the ability of Mustang Water to provide water for Nucla and its other customers, and for any maintenance or improvements to the dam and ditch system. 8. No outstanding geologic formations, absence of rare or endangered plants, no historical sites. 9. Negative impact on private ranchers grazing livestock and raising hay on their land in the 114 mile zone.
1730	This section of the river is not outstanding, it would take too many changes to make it fit the intent of the WSR act. It would require destroying the dam and ditch to make this section a good candidate for the WSR classification. This would negatively impact the domestic water supply for Nucla and the livelihoods of the farmers and ranchers who depend on the Mustang Water Authority who operate the diversion dam and CCC ditch.
1731	It would be best to remove this section of the river from consideration for inclusion in the WSR, just like the next section of the river below the Pinon bridge that flows past Nucla and through Naturita.
1732	The simple way to manage this section of the river is to exclude it from the WSR designation and manage it with the present (1989) ACEC / SRMA regulations. This section of the river is very much like-the section of the river that runs from the Pinon bridge downstream through Naturita.
1733	It seems as though this whole effort by the BLM to include so much of the San Miguel river system into the WSR is meant only to satisfy the wants and desires of a few fishermen, rafters, kayakers, and tourists. The BLM does not seem to care about the water needs of, or the hardships and negative effects on: local ranchers, farmers, Nucla townspeople, and miners, that would result if this section of the river is included in the WSR.

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1734	This section of the river is only used by the rafters, fishermen, and kayakers during spring runoff. Around the middle of June after water diversion has started, the water flow drops too low for boating and fishing. Then the gold miners clean up the trash and feces left on their claims by the boaters and fishermen. The miners use the river bed for placer mining into the month of November. In addition to cleaning up the boating and fishing refuse, the miners also remove hazardous mercury and lead (lost fishing weights and bullets) from the river bottom environment which benefits fish and whoever eats the fish.
1735	Townspeople, local farmers, and ranchers utilize the resource throughout most of the year. The present management system provides the best access and use of the valuable water resources for the most people without negatively impacting the area.
1736	The present ACEC & SRMA plans provide protection for the habitat, the river, and the many water users. It is also compatible with private landowners. Putting this section of the river into the WSR system will only cause water problems with townspeople, private landowners, ranchers, and farmers. To me, the WSR is a bad plan for most of the main stream of the San Miguel.
1737	It might make sense to put some of the river's tributaries into the WSR such as Horsefly and Beaver Creeks. Also some more remote sections of the river could be included, such as the river between Clay Creek and upstream of the diversion dam. But a lot of the San Miguel downstream from Telluride is too developed and settled to meet the original intent of the WSR act.
1738	The BLM's money and people could be better utilized working in other more pressing areas of land management. Trying to put most of the watercourses in the Uncompahgre management area into a WSR designation isn't wanted or needed, and doing this just to please some tourists isn't wise.
1740	I am writing to voice my opinion in regard to the Wild and Scenic River Act. There is no sensible reason to turn the San Miguel River into a Wild and Scenic River.
1741	As a member of the Western Colorado chapter of the GPAA, I do not want to be treated the same way the government treated the American Indian. We have claims on the river that have been granted by you, and now you are threatening to take them back. Too often the government took back lands granted to the Native Americans.
1742	The water ditch managed by Mustang Water would have to be destroyed under your plan. This ditch serves ranchers and the Town of Nucla. Would the utilities that currently cross the river have to be rerouted, and at whose expense?
1743	Let's keep this river the way it is now so that all Americans can use the river the way we have been able to use it.
1748	We have visited that portion of the San Miguel and there was not enough water in the river to raft, canoe, or kayak. The setting was serene and beautiful and should be enjoyed by all, including gold prospectors. We have just started learning to pan for gold, not in hopes of hitting vast riches but in the enjoyment of being outdoors in an enjoyable hobby.
1749	We would hate to see the BLM pursue their program of turning the San Miguel into a Wild and Scenic River. Contrary to what our state governor believes about Colorado loving California, we totally disagree with him and those supporters. Following their example of shutting down all personal dredging for gold is totally unacceptable to our state. Please remember that your logo at the top of the enclosed papers says that it is a National System of Public Lands. Keep it open to all activity including gold prospecting.
1751	The proposed action to turn the San Miguel River into Wild and Scenic is preposterous. I am a small time recreational prospector who enjoys my time on the river. While there I clean up behind myself and others. In my opinion I do more good than harm to the river and its adjacent land as well as influenced the economy of the local area.
1769	Those lands, as well as potential wild and scenic river corridors, should be closed to all forms of energy development and transmission. Protecting these lands has the added benefit of helping protect wildlife habitat, cultural resources, and mitigating the impacts of climate change.
1789	The draft Wild and Scenic Eligibility Report for the BLM Uncompahgre Planning Area (issued as a component of the field office's RMP revision process), provides helpful base information about area streams with potential for inclusion in the National Wild and Scenic Rivers System. In particular, the draft report's detailed background

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	data, maps, and initial analysis of flows and values in the streams considered is very helpful.
1790	Eligibility determinations for streams flowing through the UFO Planning Area and through adjacent federal land planning areas should provide protective status equal to or stronger than that provided in adjacent planning areas. That is, any UFO streams with segments found eligible in adjacent areas should also be found eligible. Any stream segments not found eligible in adjacent areas should still be considered for eligibility in the UFO area.
1791	The Dolores River, in particular, fits this situation. This regionally significant river warrants consistent and coordinated status, management, and protection through its entire public lands reach. Eligibility status for Dolores segments in the Grand Junction Field Office and in the San Juan Public Lands planning area warrant eligibility status and protection for segments in the UFO planning area.
1792	Similarly, eligibility status for Roc Creek segments in the Manti-La Sal National Forest management plan warrant eligibility status and protection for segments in the UFO planning area, where Roc Creek traverses unique and sensitive areas with wilderness characteristics and other unique stream-related features.
1793	The San Miguel River is another regionally significant and iconic stream that flows through the UFO planning area. In addition to the San Miguel's inherent stream-related outstandingly remarkable features, the river also provide an important contribution to stream flows in the Dolores River downstream of the confluence of the two rivers. This contribution to Dolores flows is particularly important when those flows are constricted by operation of the McPhee Dam. With recently identified imperiled fish populations identified as surviving just below the confluence, San Miguel flows reflecting as natural hydrograph, as much as possible in the context of existing water diversion rights, need to be protected. Eligibility determination for the full length of the San Miguel through the UFO planning area, and for significant tributaries to the river, is a key initial component of protection of the river itself and of unique natural features downstream.
1795	Streams not included in draft Eligibility Report A general flaw in the draft report is the low number of stream segments proposed as eligible in the requirements and definitions of The Wild and Scenic Rivers Act of 1968. Any of the 173 river segments initially considered by the BLM that even possibly meet the simple and basic definition of eligible—generally free-flowing and possessing at least one outstandingly remarkable value—should be carried forward to complete eligibility analysis.
1796	Meanwhile, we respectfully request that the BLM make available details of the agency's review of streams identified for review but not included in the draft Eligibility Report. This information should be subject to public review and comment before final decisions are made about those streams not currently included in the draft Eligibility Report.
1797	The complete absence of eligible segments of the regionally significant Uncompahgre River warrants reconsideration or, at least, thorough explanation. Similarly, the absence of eligible segments in the upper Gunnison River warrants reconsideration or explanation.
1798	Specific stream segments in the draft Eligibility Report Each stream segment included in the draft Eligibility Report should remain in the report for more complete analysis of its eligibility and subsequent suitability analysis. Each stream segment provides important stream flows and unique values that warrant additional analysis and related protection. Several stream segments are especially important because of their regional significance, connection and complement to other streams and stream corridors, and connection to other public lands values.
1801	Gunnison River, segments 2 and 3 This regionally significant river warrants careful review and enduring protection as an important recreational opportunity and as the hydrologic heart of unique adjacent public lands.
1803	Monitor Creek This stream is an important feature associated with adjacent lands with wilderness character and included in citizen wilderness proposal lands. Those wilderness values should be considered as part of this streams wild and scenic evaluation.
1804	Potter Creek This stream is an important feature associated with adjacent lands with wilderness character and included in citizen wilderness proposal lands. Those wilderness values should be considered as part of this streams wild and scenic evaluation.
1805	Roubideau Creek, segments 1 and 2 This stream is an important feature associated with adjacent lands with wilderness character and included in citizen wilderness proposal lands and included in congressionally recognized national forest lands upstream. Those wilderness values should be considered as part of this

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	streams wild and scenic evaluation.
1806	San Miguel Unit Beaver Creek Traversing a narrow corridor of public land, this stream holds important potential for preserving and enhancing stream-related natural values for a broad, otherwise private-land, geography. The creek is also an important contributing tributary to the San Miguel River.
1807	Saltado Creek Traversing a relatively narrow corridor of public land, this stream holds important potential for preserving and enhancing stream-related natural values for a broad, otherwise private-land, geography. The creek is also an important contributing tributary to the San Miguel River.
1808	Dry Creek This stream traverses a uniquely un-roaded public landscape, providing important wildlife support and general ecological vibrancy.
1809	San Miguel River, segments 1, 2, 3, 5, and 6 As noted above, all segments of this river are inherently significant, and the river provides important contribution to flows in the Dolores River.
1810	In addition to ensuring strong and enduring protection for the public lands segments of the river, the BLM should engage landowners and other land managers in Segment 4 to ensure cooperative measures to a) protect a continuous healthy stream corridor and b) to ensure natural-hydrograph flow contributions to the Dolores River.
1811	Tabeguache Creek, segment 1 This stream traverses a uniquely un-roaded public landscape, providing important wildlife support and general ecological vibrancy along the stream itself, and complementing congressionally recognized national forest lands upstream.
1812	Tabeguache Creek, segment 1 This stream traverses a uniquely un-roaded public landscape, providing important wildlife support and general ecological vibrancy along the stream itself, and complementing congressionally recognized national forest lands upstream.
1813	Lower Dolores Unit Dolores River Few rivers in the southwestern United States boast the stunning scenery, distinctive and colorful geology, and outstanding recreation opportunities as those found along the Dolores River. The heart of a broader landscape of ecologically rich public lands (well beyond a one-quarter-mile-each-side wild and scenic study corridor), the Dolores River is an essential element of larger land values and of management decisions affecting those values. Because this iconic river is already significantly diminished and threatened by river impoundment upstream of the UFO study area, every possible protection must be applied to the river and to its corridor. A decisive finding of eligibility is the first step in toward that protection. Meanwhile, recent eligibility findings for segments of the Dolores downstream of the UFO planning area, and long-standing eligibility recently affirmed for river segments upstream, warrant equal or stronger management status and protection for this key mid-stream segment.
1814	La Sal Creek, segments 2 and 3 This stream traverses a distinctive canyon corridor, affording a stunning backdrop to outstanding recreation opportunities. The stream itself provides rare water source and riparian environment in an otherwise arid area.
1815	Lion Creek This stream traverses important un-roaded geography, including distinctive canyon features on both sides.
1816	We do not need WSR Act in Colorado. The San Miguel River does not need the WSR Act designations. All of the regulations, rules, management are in place to date to manage our public lands for multiple use. And the well being and health of our public lands. Theirs no need for over regulations of our public lands.
1820	We do not need any WSR designation in Colorado. Public lands should remain multiple use. Management is in place today, it works well now, it will work well into the future.
1826	The San Miguel River should remain the way it is and has been- open for public use and for agricultural purposes.
1843	San Miguel River Corridor--- Has been preserved as a well used recreation corridor for fishing and boating. With the partnering of The Nature Conservancy this river corridor should continue to be protected as it is.
1856	The Dolores River Corridor is a special place in need of special consideration. The Lower Dolores River carves one of America's premier wild river canyons. The 170 - mile segment from below McPhee Reservoir to the river's confluence with the Colorado River in Utah traverses some of the most remarkable landscapes in the desert Southwest. Renowned features of the Dolores River include magnificent stands of old - growth ponderosa pine, thrilling whitewater rapids such as Snaggletooth, sheerwalled sandstone canyons, and hidden

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	archeological treasures. The Dolores River's scenic grandeur and ecological richness have been found suitable for Wild and Scenic designation since 1975. Whitewater enthusiasts, naturalists, and other backcountry users of all stripes value the rugged beauty, wildlife, quiet solitude, and connection to history these canyons offer. The river's scenery, geology, fish, wildlife, plant communities, and human history are woven into a continuum of ever changing wonders as one travels the 170 miles downriver from McPhee dam to the river's confluence with the Colorado River in Utah. Here, the geological and biological transformation from Southern Rocky Mountains to Colorado Plateau is compacted and therefore unparalleled among other great rivers of the Southwest. Along the river's journey, four anticlines reveal deep, pristine canyons. Exposed is a nearly complete depositional record of Mesozoic times, from the cream-colored, cross - bedded Dakota Sandstone, to rainbow pastels of Morrison rock, to the oldest cliff forming red rocks of Triassic age. Trees are a prominent feature, and include upland riparian cottonwood, old growth ponderosa pine and Douglas fir mixed with alder and dogwood, high desert pinon and juniper with intervening boxelder, and the willows, privet, wild rose and cactus gardens of Slickrock Canyon. Visitors often are rewarded with sightings of river otter and desert bighorn. The river, too, ranges from meandering Class I water with deep back eddy trout pools to raging Class IV whitewater. A hike to the rim anywhere affords unmarred vistas of westward dipping tablelands framed by snowclad peaks of the La Sal Mountains. On the human side, traces remain of ancient hunter - gatherer and Puebloan societies: rock art panels, stone granaries, and cave shelters. Few other river segments in the west offer such extraordinary variety.
1857	The river supports a variety of economic and recreational activities that benefit nearby communities. Working farms and ranches, professional outfitters anglers, historians, river runners, hikers, archeologists and recreationists all share an interest in preserving the Dolores River Basin.
1858	The entire river basin spans numerous BLM and US Forest Service offices and should be cooperatively managed to ensure that the river's serenity and beauty can continue to be enjoyed and explored but never exploited or taken for granted. As more people move into the communities around the Lower Dolores and as more recreationists learn about the area, the potential for increased development, both recreational and commercial, threatens to chip away at and permanently alter the amazing resource we all have in the Dolores Basin. Action needs to be taken now to ensure that the numerous qualities of the Lower Dolores River are sustained into the future, or it will be too late. Planning processes such as this one are the first step in ensuring that the Lower Dolores will be enjoyed by generation to come.
1859	The Dolores River Coalition is committed to finding a long-term solution for protection of this landscape. To that end we have participated in the RMP revision process for both the San Juan and the Grand Junction Field Offices, as well as river focused processes such as the Wild and Scenic Suitability Stakeholder Process for rivers and streams in the GJFO and the Lower Dolores River Management Plan Working Group process focused on wild and scenic and alternatives to wild and scenic for the portion of the Dolores in the San Juan FO. While the UFO contains a much smaller swath of the Dolores River Corridor's public lands and a shorter stretch of the river than the other two field offices, it is the core part of the river ecosystem. We therefore urge the UFO to consider the portion of the Dolores River Corridor within its jurisdiction to be an integral part of the larger Dolores River ecosystem as you make management decisions for the area.
1864	Wild and Scenic River Suitability As part of the RMP revision process the BLM is required to determine the eligibility and suitability of rivers and streams under the Wild and Scenic Rivers Act. Previous findings of wild and scenic suitability for the Dolores River should be reaffirmed in the plan update. The Dolores has been found suitable in the past and still maintains the same qualities. Few streams boast the unique natural values as are found along the Dolores River. The river itself, and all its eligible tributaries, should receive immediate, thorough, and enduring protection.
1865	Oil and Gas Leasing and Development Oil and gas leasing, exploration, and development should be prohibited in the Dolores River Corridor, certainly within visual proximity of the river itself. Any existing or future leases should maintain non-waiveable No Surface Occupancy Stipulations. Impacts of development within the corridor are not consistent with protection of outstandingly remarkable values associated with wild and scenic suitability or the existing Special Recreation Management Area Designation. Not only is the river spectacular from an ecological, scenic, and recreational standpoint, the Dolores has also been found suitable for W&S designation since the 1970s. It has been the practice of the BLM to apply NSO stipulations per the BLM's 1990 Dolores River Corridor Management Plan.
1869	Wildlife Habitat & Sensitive Species Management Given the diversity of flora and fauna range and habitat found

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	in this portion of the Dolores basin - Mule Deer, Elk, and Wild Turkey winter range as well as Gunnison Prairie Dog colonies and the location of three CNHP Potential Conservation Areas (Dolores Canyon South, Dolores River - Slick Rock to Bedrock, and Dolores River - Uravan to Roc Creek) - great care should be taken to follow the planning and management guidance for these resources as outlined in the "Wildlife Viability", "Special Status Species/Plants", and "Travel Management" sections of the broader conservation group comments referenced earlier. We also encourage the incorporation of directives outlined by the Center For Native Ecosystems in their scoping comments. Please see attached spreadsheet (UFO_Dolores Basin PCA Species.xls) for a list of the species associated with the three CNHP Potential Conservation Areas noted above.
1870	Socioeconomic Analysis The Socioeconomic comments and studies submitted within the broader conservation group comments should be considered for the relevant portion of the basin within the UFO's jurisdiction.
1871	Cooperation with adjacent BLM Field Offices and Other Agencies The Dolores Corridor should be managed in close cooperation with adjacent BLM Field Offices. For example, the Dolores River Canyon Wilderness Study Area is bisected by the UFO and the San Juan FO, but requires consistent and close management, especially considering issues with motorized incursions from the Utah. The Sewemup Mesa CWP expansions to the existing WSA also overlap the Grand Junction and Uncompahgre BLM field offices. Significantly, the river itself crosses boundaries between the San Juan, Uncompahgre, and Grand Junction Field Offices. It is important that the river ecosystem be considered as a whole in order to institute management that maintains its unique qualities. We urge the Uncompahgre Field Office to adopt a broad vision of the landscape in approaching the cooperative management of these areas. We urge the BLM to work with other agencies as well. Some of the outstandingly remarkable values identified in the Dolores River Corridor - fish species, plant species, and recreational boating - depend on a healthy functioning ecosystem, adequate stream flows, and well managed spills from McPhee Reservoir. We urge the Uncompahgre Field Office of the BLM to work with water managers (including the Bureau of Reclamation and the Dolores Water Conservancy District) as well as adjacent BLM field offices, The Dolores River Dialogue, conservation groups, boaters (both private and commercial), and other stakeholders to ensure that outstandingly remarkable values of the Dolores are maintained and enhanced and that viable flow regimes are developed for both the benefit of the ecosystem and boating. This is an outstanding natural landscape, which includes several unique plant and animal communities and provides one of the most spectacular recreational boating experiences in the country. Most of the land bordering the river is under public ownership and river flows are highly regulated by the McPhee Dam. The Dolores River corridor requires coordinated management in order to preserve these resources for the future.
1948	HCCA would like to see effective protection extended to all of the river segments identified in the Draft Report. We support WSRA designation for the permanent security the Act affords to riparian ecosystems, including adjacent habitat, water quality and quantity, and wildlife. The Act has preserved forever in a free-flowing condition some of America's most valued rivers and maintained their outstandingly remarkable values. We feel that it strikes an equitable balance between recreation, water use and environmental concerns, while providing a proven instrument for achieving long-term river sustainability.
1949	However, we recognize that WSRA designation may not be necessary for every segment identified in the Draft Report. In light of this, we feel strongly that other protective mechanisms should be applied to non-designated streams to protect their free-flowing character and Outstandingly Remarkable Values (ORVs). We would like to see every river segment identified in the Draft Report protected in one of three ways: (1) eligible, suitable and recommended for WSRA protection; (2) eligible, suitable, not recommended, but given ongoing suitability protections; or (3) eligible, not suitable, and returned to general Resource Management Plan (RMP) administration, but with strong protection mechanisms that maintain eligibility and all ORVs. We hope to see an updated RMP that includes recommendations for Wild and Scenic designations for several segments, as well as management schemes for non-designated segments that incorporate numerous protections contained in the WSRA.
1950	We believe that all of the river segments listed in the BLM's Draft Wild and Scenic Rivers Eligibility Report should retain their eligibility for inclusion in the National Wild and Scenic Rivers System (NWSRS).
1951	We also support the report being finalized so that evaluation for suitability can commence
1952	During the interim while the rivers are being analyzed for suitability, it is imperative that BLM manage all eligible segments protectively, as mandated under the WSRA and BLM policy. The BLM's Wild and Scenic Rivers – Policy and Program Direction for Identification, Evaluation, and Management states: When a river segment is determined eligible and given tentative classification . . . its identified outstandingly remarkable values shall be

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	afforded adequate protection, subject to valid existing rights, and until the eligibility determination is superseded, management activities and authorized uses shall not be allowed to adversely affect either eligibility or the tentative classification . . . . (BLM Manual 8351.32(C)). If necessary, BLM should consider heightened monitoring of river segments to ensure that the values that make them eligible for designation under WSRA are not compromised during this interim period.
1953	Segments Found Eligible and Suitable that are Not Recommended for WSRA Designation For those segments determined to be suitable, but not recommended, HCCA would like the BLM to manage the segment through the RMP in order to maintain the suitability of each segment. Under this strategy, non-recommended segments would be managed so that no action could interfere with eligibility or downgrade suitability standing. We would like to see these segments protectively managed in perpetuity as suitable rivers. Alternative management strategies, including securing instream flow rights, should be explored as a way to provide realistic protection of the specific ORVs associated with the suitability finding. To establish alternatives, the BLM will be required to request appropriation or acquisition of instream flows that consider all limbs of the natural hydrograph. Where instream flow rights cannot be secured, substantive land management prescriptions should be incorporated into the RMP to ensure long-term protection (i.e. protect the riparian resources without a water right). We encourage the BLM to manage each suitable segment to preserve the river's free-flowing quality, as well as to protect and enhance the values for which it was initially designated.
1954	Segments Found Eligible and Suitable that Are Recommended for WSRA Designation As an initial criterion, a determination of suitability and subsequent recommendation should be encouraged for those segments with continuous and majority BLM surface ownership. Recommendation should also be pursued where there are federally protected lands (i.e. designated wilderness, Wilderness Study Areas, National Conservation Areas, etc.) overlapping or in close proximity to the segment. Other factors that would be conducive to WSRA designation include the presence of endangered fish, wildlife and/or species of concern; the likelihood of establishing an effective buffer zone along the segment; the ability to limit off-highway vehicle (OHV) travel to designated routes only (and to exclude such use in wild segments); the ability to establish No Surface Occupancy (NSO) restrictions; and few or no stream crossings in the segment (except in areas given tentative "recreational" status). If all or a majority of these factors are satisfied, then a suitability determination and recommendation for inclusion in the NWSRS should be seriously considered.
1955	Segments Found Eligible but Not Suitable for WSRA Designation For a variety of reasons, it is unlikely that BLM will find every segment suitable for inclusion in the NWSRS. We are especially concerned with what happens to river segments that the BLM determines to be non-suitable. The Draft Report states: Once a record of decision is approved, segments identified as not suitable will revert to management according to the prevailing RMP. (4). See also 115. In broad terms, this reversion policy might not ensure adequate long-term protection of the rivers and their ORVs. To accomplish such protection, we would like the RMP to contain specific management prescriptions that provide protection for every non-suitable segment's free flowing-values and river-related values (i.e. ORVs). We ask that the BLM incorporate directives and land use prescriptions into the RMP that protect and enhance both the segments and their ORVs. This would preclude the BLM from authorizing any use that would substantially degrade the river. We encourage BLM to develop an RMP that maintains and augments each segment's current natural condition. Through thoughtful planning and coordination, this could be accomplished for those rivers that are not found suitable.
1956	The WSRA is valuable not only because it protects the river segment itself, but also because it ensures protection of surrounding habitat. Buffer zones are essential for maintaining the integrity of the eligible river segments. Thus, to accomplish the goals outlined above, RMP guidance should adequately protect not only the river segment, but also the adjacent physical landscape. We would like to see the WSRA's buffer zone protections included in the RMP for non-suitable segments, and we encourage flexible boundaries to accommodate specific features and river values. The preliminary boundary (and final boundary, once designated) is generally one-quarter mile from the ordinary high water mark on both sides of the river. This boundary, by section 3(b) of the WSRA, may vary on either side of the river and be narrower or wider so long as the total corridor width averages no more than 320 acres per river mile. (BLM Manual 8351.25(B)). Any management strategies should maintain or exceed this level of protection to fully safeguard the riparian ecosystem's health and integrity. This is especially true where there are upstream water quality issues that fall outside of the traditional 320-acre per mile buffer zone, per section 3(b) of WSRA. For example, selenium contamination and oil and gas development are two upstream water quality problems that could negatively impact river segments. The RMP must address these and similar threats and contain proactive management

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	strategies. Examples of selenium mitigation measures that could be included in the RMP are provisions for eliminating unlined ditches and unlined stock ponds. Oil and gas development is another significant threat, especially in the North Fork area. The RMP should mandate that specific Best Management Practices be used in oil and gas development that minimize impacts on watershed health. OHV use within and around river segments is a third concern. Unregulated OHV use damages riparian ecosystems. Because of this, we encourage the BLM in their RMP to restrict OHV travel to designated routes only. Even without suitability determination, permanent protection of river values can be assured through effective measures contained in the RMP.
1957	Suitability We encourage the BLM to begin the suitability review process. This is the final step in the evaluation procedure, and concludes with a determination of suitability or non-suitability. This phase also results in a suitability report and record of decision (ROD), which must be detailed with maps and consider a number of factors (16 USC § 1275(a); BLM Manual 8351.33(A)). The final report should provide the public with information detailing the criteria that BLM used to determine suitability status. Specifically, we would like to see detailed information explaining the strategies employed in the determination process, as well as the individual resource conditions that led BLM to choose suitability or non-suitability. Factors to consider include, but are not limited to: the need to protect threatened, endangered and sensitive species; status of landownership; reasonably foreseeable potential uses of the water and lands; federal, state, local and public interests; costs of acquiring necessary lands; the ability of the agency to manage the segments and their uses; historical and existing water rights; and instream flow requirements, including state appropriated instream flow rights.
1958	In analyzing instream flow, we ask that the BLM quantify instream flow protection requirements related to ORVs and other resource values identified through the RMP process. Under the WSRA, water rights claimed or asserted are based on the amount of water required to protect the ORVs identified on the particular segments. During suitability study, BLM should "conduct a comprehensive, interdisciplinary, resource value-based assessment in order to delineate resource values, relate flows to resource conditions, and formulate flow protection strategies which incorporate legal, technical and administrative aspects in order to secure instream flows which address values associated with the . . . segment" (BLM Manual 8351.51(B)(2)(K)). As a component of the suitability process, it is essential that the BLM quantify the amount of water necessary to protect the segments and their surrounding riparian habitats.
1959	WSRA designation may not be desirable for all river segments. For example, recommendation may not be appropriate where the majority of a segment is under mixed ownership (private/federal). Even where designation is desirable, competing interests and local water user concerns may preclude a segment from being recommended for the NWSRS. As in other BLM Field Offices, there may be some desire to form a local stakeholder group, out of concerns, questions or interest in exploring all options for protecting eligible streams. If such a group is created, strategies which focus on management efforts that protect selected streams and their associated values should be pursued, rather than an effort which focuses solely on avoidance of federal designation or federally reserved water rights. One option to explore is the State Wild and Scenic Rivers Fund. Enacted in 2008, the fund appropriates $400,000 annually from the Colorado Water Conservation Board's construction fund to develop stakeholder-based management alternatives.
1960	Another strategy to consider could be designating segments as Areas of Critical Environmental Concern (ACEC). There are currently four ACECs within the Uncompahgre Field Office planning area: Needle Rock, Fairview, Escalante Canyon and Adobe Badlands, each adding an additional layer of environmental protection within the RMP. To be considered a potential ACEC, an area must meet criteria of both relevance and importance (BLM Manual 1613.1.11). ACEC designations highlight areas where special management attention is needed to protect and prevent irreparable damage to important historical, cultural and scenic values, fish or wildlife resources, or other natural systems or processes. This management scheme could be incorporated into the RMP to protect ORVs for non-recommended segments.
1961	In considering alternatives, it is essential that there be effective stakeholder participation at all levels of the process, from local to state to federal interests, encompassing conservation organizations, water-rights holders, recreational interests, water providers, and state and federal agencies. Diversified participation is necessary to explore a variety of alternatives for protecting ORVs without compromising Colorado's ability to fully use its compact entitlements. We understand the responsibilities that BLM has under the Act and do not want BLM to lose focus on those duties. We ask that any alternative strategies be written into the RMP with clear provisions that BLM can enforce. In addition, any stakeholder plan must run on the same timeline as the RMP process. It is essential that a timeframe be developed with a clear desired outcome and completion date. Finally, given the often directly competing interests of various stakeholders, third-party enforcement of any alternative is

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	necessary.
1964	In conclusion, HCCA and the undersigned organizations ask that the BLM finalize the eligibility report and include all identified segments in the final report. We would like to see each segment classified as either (1) eligible, suitable and recommended, (2) eligible, suitable, not recommended, but given permanent suitability protections, or (3) eligible, not suitable, and returned to RMP management with strong protection mechanisms.
1965	For segments where opposition to WSRA designation may exist, please initiate a process to determine if an alternative management strategy would be appropriate. If so, there must be clear guidelines and timelines for developing these alternatives in the RMP.
1982	A focus for our group these past years has been the health of our Uncompahgre watershed, its tributaries, and the riparian areas with their wildlife. We are familiar with the 35 segments on 23 rivers that the BLM has inventoried for Wild and Scenic eligibility status and we are in full support that all 35 segments qualify. All 35 segments deserve to be evaluated for suitability status. Each segment possesses one or more outstandingly remarkable values including riparian habitat, important native plants, seasonal range for wildlife, characteristics for watershed health, and more.
1983	When looking at the size of the BLM area, these 35 segments constitute a relatively small portion of our waterways. But only with the additional protection that these segments deserve, can we add to the health of our watershed. We urge that all 35 segments be evaluated for suitability status in the next phase of your RMP
1984	As stakeholders, we would be pleased to help with analyzing various management prescriptions and the positive and negative impacts of various designations for each segment. In this manner we hope to be part of a process to consider potential impacts to other values such as water supply.
2026	The Dolores River Corridor is a special place in need of special consideration
2032	While the UFO contains a much smaller swath of the Dolores River Corridor's public lands and a shorter stretch of the river than the other two field offices, it is the core part of the river ecosystem. We therefore urge the UFO to consider the portion of the Dolores River Corridor within its jurisdiction to be an integral part of the larger Dolores River ecosystem as you make management decisions for the area.
2043	Wild and Scenic River Suitability As part of the RMP revision process the BLM is required to determine the eligibility and suitability of rivers and streams under the Wild and Scenic Rivers Act. Previous findings of wild and scenic suitability for the Dolores River should be reaffirmed in the plan update. The Dolores has been found suitable in the past and still maintains the same qualities. Few streams boast the unique natural values as are found along the Dolores River. The river itself, and all its eligible tributaries, should receive immediate, thorough, and enduring protection.
2167	Wild and Scenic: The UFO's Draft Wild and Scenic Rivers Act Eligibility Report identifies 35 segments within BLM's Uncompahgre Planning Area as eligible for Wild and Scenic Rivers Act (WSRA) designation. TU supports the BLM's proposed eligibility determinations for all of these streams. We especially support eligibility findings for Deep Creek, the West Fork of Terror Creek, and Segments 1,2 and 3 of the San Miguel River. Deep Creek and the West Fork of Terror Creek harbor genetically pure populations of greenback cutthroat trout, a listed threatened species under the Endangered Species Act. Segments 1, 2 and 3 of the San Miguel River support highly prized recreational fisheries. It is our understanding that, though not formally designated. Trout fisheries in the lower portions of these segments support Gold Medal quality trout. In addition to these designations, TU believes Doug Creek should be found eligible for designation as, based on our information, it supports a conservation population of CRCT (see Figures 1 and 2). Taking this step toward additional protection of this conservation population would support the interagency Conservation Strategy (2006). TU believes these segments are also suitable for designation. We will comments regarding suitability once the draft suitability analysis available by the UFO.
2215	Protect as many eligible rivers and tributaries as possible. All of the river segments listed in the BLM's draft Wild & Scenic Rivers Eligibility Report should retain their eligibility for inclusion in the National Wild and Scenic Rivers System, and should be carefully evaluated for the next level of protection. Particularly deserving are those with unusually good understories of buffalo berry, New Mexico privet, or box elder, or stands of cottonwoods
2216	Cottonwood Creek, Monitor Creek, Potter Creek, and Roubideau Creek. These creeks provide and complement wildlife habitat and ecological diversity near the rich country along Monitor Mesa and the

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	surrounding or nearby Roubideau/Camel Back Wilderness Study Area
2217	Escalante Creek. Escalante Creek and its tributaries define the surrounding country; protecting these streams will ensure healthy wildlife, productive agriculture, and stable water tables.
2218	Gunnison River. The Gunnison River itself contains segments that should be carefully evaluated to ensure enduring protection for the important fish habitat and recreation opportunities there, whether through wild & scenic river measures or other approaches. Protection strategies should recognize and integrate the protections already in place in the Dominguez-Escalante National Conservation Area and should ensure that no new dams or major water diversions occur on the Gunnison above its confluence with the Colorado River
2220	North Fork of the Gunnison. This watershed faces increasing development and recreation pressure. All eligible streams there should be carefully reviewed for protection
2221	San Miguel River. This watershed is nearly incomparable across the western United States for its intimate ecological settings, remote and thriving backcountry, naturally varying and flowing river and streams, contribution to important water systems in several states, and scenic wonder. Every eligible stream segment in this watershed should receive prompt, extensive, and reliable protection, both through wild & scenic suitability findings and through clear and firm management prescriptions in the BLM's resource management plan
2222	Beaver Creek, Dry Creek, Fall Creek, Naturita Creek, and Saltado Creek. These creeks are important contributors to the flows and health of the San Miguel itself and provide essential riparian habitat and geographically important streamflows in their own rights.
2223	San Miguel River. Segments of this river warrant the most thorough analysis and the highest level of protection for habitat, riparian health, and avoidance of industrial intrusions.
2224	Tabeguache Creek. This creek should be designated in keeping with the surrounding lands status as a congressionally designated area for preserving wilderness values.
2225	Dolores River. Few streams boast the unique natural values-and extent of threats to those values-as are found along the Dolores River. The river itself, and all its eligible tributaries, should receive immediate, thorough, and enduring protection. As larger conversations, among a diverse and extensive collection of experts, local governments, and stakeholders, are now proceeding toward a more natural and reliable regime of streamflows in the Dolores River, it is both timely and essential that the BLM provide the interim protection afforded under wild & scenic suitability. This action, and correspondingly protective measures in an update resource management plan, will both contribute to, and provide opportunity for, those broader conversations to reach successful conclusion.
2648	The Dolores River Valley is one of the last great places; please help protect it.
2667	We need to conserve our wilderness and our area of clean water.
2687	Please protect the Dolores River Basin, it's spectacular scenery and habitat for many of the wild animals.
2829	11. Wild & Scenic Rivers We are submitting separate, detailed comments on the Wild and Scenic Rivers Eligibility Report; however, we want to include some general comments on protecting streams and segments within the Uncompahgre Field Office as part of this RMP revision. Rivers deemed eligible for inclusion in the Wild and Scenic Rivers System must be managed to protect their 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 Uncompahgre RMP. Protect all eligible segments 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 measures must be specific to wild and scenic eligibility and suitability 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

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Comment ID	Comment
	exclusively for wild and scenic river purposes. Similarly, the BLM can protect river values through other special management designations. Such 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. Apply available protections specific to wild and scenic Whatever the ultimate collection of stream segments found to be suitable, BLM should consider the following management options for protecting each segment and apply those that are necessary for adequate protection: • closed to off-highway vehicle use; • withdrawn from mineral entry; • as VRM Class I or Class II areas; • as right-of-way exclusion areas; • subject to remedial actions to ensure sensitive species habitat is maintained or enhanced; • subject to extensive and reliable no-surface-occupancy stipulations for all activities; • with related ACECs closed to off-highway vehicle use; • with related ACECs closed to oil and gas exploration and development; • among other appropriate measures. Reconsider and expand eligibility determinations 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 1. No other factors are considered in determining the eligibility of a river segment. All other factors are considered in determining suitability." (emphasis added) 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. 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" (1M 04-196), 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. 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. Recommendation: The Uncompahgre RMP must carefully study 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.
Wild and Scenic River Comments for Dominguez-Escalante NCA	
163	I am quite surprised to find Escalante Creek as one of the proposed segments (Escalante Creek Segment 1; Segment 2; and the Dry Fork of the Escalante segment 2). As a private landowner and rancher/farmer with property on both sides of the creek in segment 1 (one), I feel I need to comment on the Report. Having read the report thoroughly; I am dismayed by the ambiguous language which gives the BLM/ Dept. of Interior the say over management, use and development of 1/2 mile corridor of land through privately owned sections of the Creek.
520	Rubideux Creek needs federal protection to prevent the State of Colorado Prison Camp from totally taking and interesting area fully of pre-historic indian sites, wildlife, and scenic values. The same goes for Escalante Creek. A plan could help preserve the ranching way of life.

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Comment ID	Comment
833	I strongly oppose any wild and scenic river along the Escalante Creek and the Gunnison River.
1273	The following stream segments are of concern to Mr. Miller: * Dry Fork Escalante Creek, Segment 2. Report at 25-26_ * Escalante Creek, Segments 1 and 2. Report al 27-33. * Gunnison River, Segment 3. Rep011 at 36-38. As specifically noted herein, due to private land and water ownership and use, and various man-made physical structures, these segments are not eligible for Wild and Scenic River status.
1274	Dry Fork Escalante Creek, Segment 2_The BLM classifies this 2.89 mile stream segment as eligible, with a preliminary "recreational" classification. Report at 26. Of the 2.89 stream miles, an uninterrupted 0.46 mile stretch lies solely on land owned by Mr. Miller. The Report correctly notes that the stream channel is bisected by an unimproved road and by several fences to delineate livestock grazing. The Report incorrectly states that there are no water diversions within this segment. The Report fails to mention that there are also several culverts and pipes which convey water across the creek, the presence of hay fields on private land, and the presence of annual livestock grazing. The Report also fails to mention that the stream is highly intermittent, flowing for, on average, only one to two weeks per year. The Report lists the outstandingly remarkable val ue ("OR Y") of this segment at "vegetation," noting that the area contains Fremont cottonwood/skunkbrush sumac riparian vegetation.
1275	Mr. Miller's private land does not meet the criteria for eligibility as a WSR. The stream segment which crosses his private land is subject to heavy agricultural use, including grazing and haying, and is repeatedly bisected by pipes and fences, inconsistent with the WSRA's requirement that qualifying values be "outstanding" and that shoreline development be minimal. 16 u.s.c. §§ 1271 , 1273.
1277	Given Mr. Miller's heavy agricultural use, his many agricultural improvements, his exclusive management and control of vegetation located upon his private land, and the fact that "vegetation," in and of itself, does not legally qualify as an ORV, then Mr. Miller' s nearly half mile of stream segment should be excluded from the BLM's list of stream segments which are eligible for WSR designation.
1278	Escalante Creek, Segment 2_The BLM classifies this 8.48 mile stream segment as eligible, with a preliminary "recreational" classification. Report at 32-33. Of the 8.48 stream miles, 5.07 miles lie solely on private land, much of which is owned by Mr. Miller, and 2.51 miles lie on State controlled land, much of which is leased for grazing use by Mr. Miller. There are several water diversions and dams along this segment, and water is appropriated and diverted by Mr. Miller for irrigation use. At least a dozen fences cross the creek within this section. Man-made brush berms are located adjacent to the creek to control erosion. The creek has been channelized in several places. Livestock grazing occurs along the creek, and livestock drink directly from the creek. There is no public recreational access. The road often parallels or crosses the creek. The county built a staging area for road building. Irrigation ditches parallel the creek in places. Grain bins and corrals are found adjacent to the creek. Rip rap is found on the bank in various locations. A number of power lines cross the creek. Irrigation use in the summer utilizes all or nearly all flows, minimizing habitat for fish, desert bighorn sheep and other wildlife. There are a total of five farmsteads directly adjacent to the creek. In addition to the foregoing, Mr. Miller believes that the BLM is mistaken in reporting that monkey flowers and hookless cactus currently exist in this stream segment. For the reasons noted above, including the numerous water diversions, agricultural improvements and uses, and nearly exclusive private and State control of these lands, this stream segment is not eligible for WSR status.
1279	Moreover, BLM guidance precludes the BLM from designating stream segments which are predominately non-federal in ownership: In cases where a particular river segment is predominately non-federal in ownership, and contains interspersed BLM-administered lands, BLM shall evaluate only its segment as to eligibility and defer to the State or to the private landowners' discretion as to their determination of eligibility. BLM Manual 8351 - Wild and Scenic Rivers at § 0.06(B). In the case of this particular segment, nearly 90% of the creek is in State and private ownership. In such circumstances, the BLM cannot designate a stream segment as eligible without the landowner's permission. Mr. Miller, in his discretion, deems this stream segment to be ineligible for designation as a WSR.
1280	Gunnison River, Segment 3_The BLM classifies this 17.48 mile stream segment as eligible, with a preliminary "recreational" classification. Report at 37-38. Of the J 7.48 stream miles, the BLM claims that only 2.59 miles lie on private land, most of which is owned by Mr. Miller, and 0.87 miles lie on State controlled land. The BLM's river segment ownership is inaccurate, in that the majority of what the BLM claims to "own," and therefore control, is only owned and controlled on one side of the river, with ownership and control on the opposite bank being private. The BLM only acknowledged private ownership when both banks of the river were private

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Comment ID	Comment
	land. A total often private residences lie adjacent to the river. A privately owned abandoned gravel quarry lies adjacent to the river. Moreover, the BLM failed to recognize that the railroad corridor is private property. Given these facts, the majority of the segment, from the County line to its confluence with Escalante creek, is partially or wholly privately owned and controlled. As noted above, in such circumstances, the BLM cannot designate a stream segment as eligible without the landowner's permission. Mr. Miller, in his discretion, deems this stream segment to be ineligible for designation as a WSR. BLM Manual 8351 -Wild and Scenic Rivers at § 0.06(B).
1281	Moreover, the river segment does not qualify as "free flowing," given the many diversions of water (a total offour pumping plants located on private land along this segment) divert water from the river, and the presence of rip-rap on the banks in various locations. J 6 U.s.C. § 1286(b) (precluding from the definition of"free-flowing" any river section subject to "diversion" or which includes "rip-rap"). The segment is also subject to livestock grazing, a lack of public access, includes a low water dam, includes an orchard, and includes a railroad adjacent to the entire river segment. Given the diversions of water, rip-rap, many agricultural improvements and uses, and predominate private access and of these lands, then this segment does not qualify for WSR status.
1282	Given the nature of the above noted stream segments, they should not be listed as eligible for WSR designation. Disqualifying characteristics may include: I) "vegetation," in and of itself, does not qualify as an ORV; 2) lands which are predominately owned and controlled by private parties are generally not eligible or suitable for designation; 3) river segments which are subject to "diversion," or which include "rip-rapping" are not eligible for designation; and 4) lands which include numerous agricultural improvements and uses may not qualify for "scenic" or even "recreational" status. Each of the above noted stream segments include one or more of these disqualitying characteristics. At a minimum, the private lands located within the above noted stream segments should not be designated as eligible for WSR status.
1283	While 2000 people access the Gunnison River each year, there are approximately 1000 canoes, boats and other water craft.
1284	Dominguez-Escalante National Conservation Area streams It is appropriate to exclude from eligibility analysis under the Uncompahgre RMP revision streams found in the Dominguez-Escalante National Conservation Area, deferring that analysis to planning processes and RMP for that NCA, so long as the NCA plan does thoroughly analyze those streams. If the NCA planning processes fails to adequately implement that analysis, those streams must be added to the Uncompahgre RMP planning analysis. Any wild and scenic analysis for NCA streams, whether conducted through the NCA plan or the UFO plan, should not assume that the streams are sufficiently protected by the NCA or (within the NCA) wilderness designations.
1285	Lower Gunnison Unit Cottonwood Creek This stream is an important feature associated with adjacent lands with wilderness character and included in citizen wilderness proposal lands. Those wilderness values should be considered as part of this streams wild and scenic evaluation.
1286	Escalante Creek, segments 1 and 2 This stream boasts unique eligible features of its own, and it contributes to geographically significant segments and public lands adjacent and downstream.
1317	Gunnison River, segments 2 and 3 This regionally significant river warrants careful review and enduring protection as an important recreational opportunity and as the hydrologic heart of unique adjacent public lands.
1794	Gunnison River. The Gunnison River itself contains segments that should be carefully evaluated to ensure enduring protection for the important fish habitat and recreation opportunities there, whether through wild & scenic river measures or other approaches. Protection strategies should recognize and integrate the protections already in place in the Dominguez-Escalante National Conservation Area and should ensure that no new dams or major water diversions occur on the Gunnison above its confluence with the Colorado River

Table C-13
Issue 1: Special Designation Areas – Wilderness, Wilderness Study Areas, Lands with Wilderness Characteristics

Comment ID	Comment
	Wilderness and Wilderness Study Areas (WSAs)
35	All of the 35 segments in UFO's WSR eligibility report appear to be deserving of WSR status, especially those with unusually good understory or buffaloberry /Forestiera/ New Mexico privet, or box elder, or stands of cottonwoods.
179	Currently Colorado has over 66 million acres of designated Wilderness areas, several new proposals for additional Wilderness are working their through congress. While I support conservation and the concept of a Wilderness area, I also believe there needs to be a balance with multiple use.
186	I feel some areas need better signage as to what is an open trail and what mode of transportation is allowed on that trail.
288	I am in favor of WSA lands becoming wilderness, but dispersed use areas which allow dispersed camping are important to me. Please resist the urge to improve facilities, access, etc. and manage every recreational experience on every piece of BLM land.
432	Also I do not support these areas even being considered as wilderness.
456	Any lands that have wilderness characteristics should be preserved and closed to future development of any kind including gas, oil, or mineral exploration.
497	I would not change any existing policies, except the Tabeguache Wilderness Area.
498	I believe the Tabeguache Wilderness Study Area is unconstitutional. If this area was voted down by Congress in 1992, then why do we still treat it as wilderness? The BLM Field Office does a good job protecting all of our interests in all areas. Make this piece of ground the same as other areas.
500	I would not change any or existing management policies, except the Tabeguache Wilderness Study area.
508	The BLM should identify other areas within the UFO which are worthy of being managed as roadless or nonmechanized, nonmotorized, and designate them for wildlife habitat. Looking at topo maps of the area, Saucer Basin on the north side of Paradox Valley has this quality and could be extended to include the CNHP Potential Conservation Area below; Saw Tooth Ridge on the southern end of Long Mesa could provide an unfragmented wildlife refuge if kept non motorized between Highway 90 to the south and where the roads begin; Similarly Skein Mesa and Wild Steer Mesa west of the Dolores River SMA have the same less roaded qualities; Nyswonger Mesa on the south side of Paradox as well as the less roaded portions of Dry Creek Basin extending south into San Miguel County might also deserve such treatment;
548	All existing wilderness and WSA's within the UFO provide extraordinary places for various wildlife species to thrive in the absence of intense human activities. They also provide us with wild places to explore on foot or on horseback. The BLM needs to retain all of the existing WSA's and to enhance them wherever possible by retaining adjacent unroaded lands in a roadless condition.
550	Even though FLPMA grandfather's in existing livestock grazing, mining, and mineral leasing in these areas, I would like to see the BLM make it a priority to retire these uses whenever the opportunity arises. If permits or leases expire, it would seem right not to reauthorize these uses again. In my opinion, mining and mineral leasing are particularly incompatible with wilderness values.
567	Please pursue wilderness designation for the Dolores River Basin.
581	The following areas should be managed as WSA's and preserved as quiet use 1.BLM land immediately adjacent to Canyon Wilderness. 2. Adobe Badlands north east of Delta. 3. Norwood Canyon. 4. Roubideau (Camel Back). 5. Potter Canyon/Monitor Creek. 6.The Dolores River Basin
583	Please consider that any lands with wilderness characteristics should be managed in such a way to preserve those characteristics.
607	When considering the Uncompahgre Resource Management Plan, please be mindful that our wild areas are shrinking. Please make the land, and the animals that inhabit it a priority. I think that it is essential for the well-being of humankind to be able to experience the beauty of nature without the intrusion of the modern world.
609	I think that we as western Americans would like to keep open the lands that are open for us and everybody that wants to visit our lands and kept open to all people. No more wilderness. Thank you Con Hirschfeld

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Issue 1: Special Designation Areas – Wilderness, Wilderness Study Areas, Lands with Wilderness Characteristics

Comment ID	Comment
	Paonia Co. 81428 Constantine37@ tds.net
627	I'm writing today to ask that you preserve the Dolores basin and the wilderness attributes that it has. My two daughters should have the privilege to experience that wildenress experience, and be able to share it with the children born years from now.
635	In addition to managing WSAs to preserve the prerogative of Congress and protect wilderness suitability, the agency should manage other lands with wilderness character in a manner that does not jeopardize their consideration for wilderness.
636	As for WSAs, the Camel Back/Roubideau area deserves special consideration and additional management attention. This area deserves to be recommended for wilderness protection—and the agency should use its maximum discretion to ensure these lands get the special attention they deserve. Contiguous with already protected national forest lands above, the Roubideau Canyon system (together with Potter and Monitor) provide critical habitat and undeveloped migration routes from montane forests into desert riparian habitat. Given the changed status of the USFS lands above the WSA (since the current UFO RMP and the 1991 wilderness recommendations) the matter of how to ensure the entire wild Roubideau system—separate from issues of agency jurisdiction—must be re-visited.
637	The Adobe Badlands is an incredible landscape that remains as a wild landscape in a developed region of the county. The opportunities for solitude and backcountry recreation area outstanding. Even if it were not a WSA—and it is—the agency should be compelled to better protect the area's sensitive soils and rare plants. It is an WSA, and the BLM is legally obligated to do so. Damage from illegal ORV use is prevalent in the area, and additional management attention—for the WSA and the ONA—is needed.
641	Currently Colorado has over 66 million acres of designated Wilderness areas, several new proposals for additional Wilderness are working their through congress. While I support conservation and the concept of a Wilderness area, I also believe there needs to be a balance with multiple use. I feel that a silent minority of vocal anti access groups have pressured the BLM to restrict resource exploration including gas and coal at a time when our nation needs these resources to reduce our dependency on foreign resources purchased from countries that don't particularly like Americans. We need monitoring and governance but we need to continue/increase our use of these resources in a way that is beneficial to all Americans and will help us reduce our dependency on foreign resources.
647	Again, I am against more Wilderness or Wilderness Study Areas, we have enough. For example, take the dominguez/escalante area that was recently turned into a NCA and includes 66,000 more acres of Wilderness. Having grown up in the Delta area I am very familiar with this area and can tell you that since this action, many, many people will never be able to enjoy the scenic beauty of this area due to it now being inaccessible unless you are the hardiest of hiker or horseback rider. I feel land can be protected without locking everyone out. This area was not being damaged by over use or rampant ATV or motorcycle use, in fact the landscape there hasn't changed much at all in the 30 years I've been visiting it. Many canyons and special places I enjoy are now totally off limits unless I can hike for several days to access them. I feel this is wrong and unnecessary and caters to that vocal minority of ultraconservative, well funded, environmentalist who probably never visited this area in the first place.
711	The second priority should be in protecting the integrity of existing WSAs, such as Sewemup Mesa, Adobe Badlands, Delores River Canyon, and Tabaguache Creek Area. And backcountry areas in general.
788	More wilderness protection, study areas, etc.
872	I do not know of any specific lands in the planning area that possess wilderness characteristics as the BLM may define them. My own idea of a wilderness is any area that man has hardly touched. But, I also see places that were once a wilderness, but man has left his mark, but by limiting mans disturbance of the area or stopping it all together, it could become a wilderness again.
873	I view the Camel Back area as one such place that if left alone, could be wilderness again. The same for the Roubideau. This would mean ending the grazing leases, closing the numerous roads that criss cross it, and limiting hunting.
895	No more wilderness or national parks, either.

Table C-13
Issue 1: Special Designation Areas – Wilderness, Wilderness Study Areas, Lands with Wilderness Characteristics

Comment ID	Comment
960	My primary concern is that of protecting wilderness areas. In wilderness is the preservation of the world.
993	The Camelback WSA is a little-known treasure which we are so lucky to have in our backyard. It is both beautiful and isolated. Drive a short distance, then walk up Roubideau Creek from the lower end, or descend into the canyon from above, and it is easy to imagine being a hundred miles from civilization. Around each corner is a new gem to discover, whether a rock formation, a bend in the creek, an archeological fragment or petroglyph, an old grazer's cabin, animal or bird footprints in the mud, a beautiful tree or wildflower, a brilliantly colorful lizard or a flock of bighorn sheep. In spite of occasional illegal entry by motorized or mechanized users, this area feels enchanted, and I'm so grateful Congress has protected it, and hope it will someday receive the permanent protection it deserves. I have worked closely with the Uncompahgre Valley Association, the Western Colorado Congress, the Colorado Environmental Coalition, the Colorado Mountain Club, the Friends of Greater Dominguez and the Colorado Wilderness Network on efforts to get legislation passed to make the Camelback area into a permanent wilderness.
994	Spend any significant time in the Roubideau area, or fly over either by plane or on Google Earth, and it is obvious that the Camelback is only a portion of the area that deserves protection. Roubideau Canyon is really part of a three canyon system that also includes Potter Canyon and Monitor Canyon, and Monitor Mesa in between. When the Camelback WSA was created, a road existed up Potter Canyon, that was closed very soon afterwards at the request of the Division of Wildlife to offer more solitude to bighorn sheep, and has remained closed in the decades since. It is because of that road that the Camelback did not originally include all of Potter and Monitor Canyons. The road has disintegrated in many places, and is still subject to illegal incursions, but clearly all three canyons deserve to be left wild.
995	Potter and Monitor Canyons are still wild and pristine and share all of the same qualities as the more protected portions of the Roubideau Canyon system, and rightfully should be included into the Camelback WSA. To preserve the solitude, I also believe that much of the lower (northern) end of Monitor Mesa should also be kept non-motorized as well. In addition to being special places for human foot and horse travel, these areas also contain at least four ecosystems identified as threatened by the Southern Rockies Ecosystem Project, and contain precious archeological resources like the wikiup site the Boyds showed me on Monitor Mesa, where I believe archeologists identified thirteen separate wikiups.
1053	Public lands are just that. Public lands, and use should be available to the largest number of people possible without compromising the integrity of the areas. Rafters, fishermen, boaters, farmers, ranchers, gold miners, should all be allowed to use it as long as they are not doing undue harm to the resources. Although not all users are "greenies," I think most people are very cognizant of the importance of keeping our public areas as pristine as possible without over-regulating them.
1082	Additionally, I personally see many hikers, joggers, and mountain bikers enjoying the Camel Back area, and believe it should forever be protected from gas development and grazing. Additionally, I believe the Adobe Badlands Wilderness Study Area and Tabeguache Area should be designated as "suitable" for wilderness.
1411	Designate the Adobe Badlands Wilderness Study Area, Camel Back Wilderness Study Area, and Tabeguache Area as "suitable" for wilderness.
1622	Please prioritize protecting the wilderness characteristics of the Dolores River Basin when developing the new resources management plan for the Uncompahgre Field Office (UFO). At the heart of the Dolores corridor, the Dolores River Canyon Wilderness Study Area and citizen recommended additions -- with towering colorful sandstone cliffs, river otter, peregrine falcon, and outstanding opportunities for remote wilderness experience -- must be managed for the protection of the area's vast wilderness characteristics.
1623	The Sewemup Mesa Citizens' Wilderness Proposal (CWP) areas within the Uncompahgre field office, including Carpenter Flats and Beehive Canyon, help to define a cohesive landscape of diverse canyon ecosystems, and should be managed for their wilderness characteristics.
1630	We ask BLM to give high priority in your new RMP to protecting the lands that have wilderness characteristics in the Dolores River watershed. Both the existing wilderness study area and the citizens' proposed additions should be managed to protect their wilderness character. Offroad vehicles should be excluded from these areas, and oil/gas leasing should be prohibited. Maps in the draft plan/EIS should show the citizens' proposed areas as well as WSA, so all readers will understand which lands are being discussed.
1636	As someone who has spent some time recreating in the Dolores River Basin I value this area and want to keep

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Comment ID	Comment
	it as pristine as possible.
1640	A few years ago, my husband and I went on a boating trip down the Dolores River and had a great time. Our only problems were difficult access sites for our drift boat and an upset orchard grower/land owner we met on our quest to find a put in. The trip was one of the most memorable ones for us because of the amazing scenery and peace of the river. I encourage you to protect the quality of the water, the pristine air quality itself, and the surrounding natural formations.
1643	Wilderness lost cannot be regained!
1648	I live in Grand Junction Co. and am quite familiar with the Dolores River and the danger and ruin of uranium and its processing and mining. This must not happen to this region.
1658	I feel the Dolores River Canyon Wilderness Study Area and citizen recommended additions should be managed for the protection of the area's wilderness characteristics. The area offers great scenic beauty, wildlife and opportunities for remote wilderness experience.
1660	Protecting the Dolores River basin is important to my and my family. One of our pursuits is bird-watching and this river corridor has many interesting species such as the Black Phoebe which until the past ten years are so was not common in Colorado.
1663	I have never seen the Dolores River Basin, but one of my friends has. He wrote and told me about it's beauty and when I heard that it is in danger from mining and other activities, I had to write and add my voice to those asking for its preservation. I would like to see the beauty my friend spoke of some day.
1665	I have rafted the Dolores three times, and have hiked in the Coyote Wash area. I have also visited Sewemup and Granite Creek. I urge BLM to evaluate protecting all of these areas from mineral leasing and development, and from motorized recreation.
1667	Thank you for this opportunity to participate! There should be absolutely no uranium mining allowed in the Dolores River Basin and motorized vehicles should be kept to a minimum and not allowed in the back country at all. We do not need to destroy every sacred and beautiful landscape we have access to, just for capital gain.
1669	I just turned 40 last weekend and my wife and myself took a 4- day trip in and around the Delores river basin!! What a magnificent place - it's beauty and pristine wilderness refreshes the soul and made me feel like I was a young kid! Let's make sure that beauty is around for generations to come. It is like a fountain of youth in our backyard!!
1671	The Dolores corridor, the Dolores River Canyon Wilderness Study Area must be managed for the protection of the area's vast wilderness characteristics. We U.S. citizens that value such characteristics recommend that you focus upon these protections as you proceed. Other interests must be considered secondary as far as me and my friends here in Iowa are concerned. We'll support your plan providing this be the case.
1710	Regarding the RMP, I would hope your long range objectives would work toward: 1) Wilderness designation for the five Wilderness Study Areas: Camelback, Adobe Badlands, Dolores River Canyon, Sewemup Mesa, and Tabeguache Creek Area. 2) Minimize/eliminate new motorized trails in remote areas that have few or no access points. In these two comments I think you appreciate the value I place on "wilderness" within our region.
1722	In the past I agreed with the UFO's assessment of Adobe Badlands as unsuitable for wilderness protection because of noise encroachment. I have reversed my thoughts about this small but pristine example of a unique ecosystem complete with endemic species. The BLM needs to reconsider the value of wilderness protection in light of the probability of energy development in the area. Without maximum protection we may lose the Adobe Badlands...the best example left of a disappearing landscape. I urge the UFO to reconsider its recommendation to congress and to give the Adobe Badlands WSA a suitable designation.
1723	I worked for the FS marking timber at the top of the Tabeguache basin. I have climbed and hiked most of the Tabeguache drainage and consider it to be an area deserving of maximum protection. I commend the BLM for protecting this area. and want to see it continued to be off-limits for mechanized as well as motorized travel.
1747	It is with great concern that we have recently learned of the BLM plan to put a large portion of the San Miguel River into a Wild and Scenic program. We do not agree with the BLM plans to place that section into a WSR program. The enclosed papers express our views and total dissatisfaction with the BLM plan. In addition we also believe that the plan is being published by a few who believe that public land should be used only by them in

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	their own method. This is basically discrimination on their part and by the BLM if this plan continues.
1767	Those lands, as well as potential wild and scenic river corridors, should be closed to all forms of energy development and transmission. Protecting these lands has the added benefit of helping protect wildlife habitat, cultural resources, and mitigating the impacts of climate change.
1768	Those lands, as well as potential wild and scenic river corridors, should be closed to all forms of energy development and transmission. Protecting these lands has the added benefit of helping protect wildlife habitat, cultural resources, and mitigating the impacts of climate change.
1835	There are many areas in the UFO that many of our members are familiar with and would like to comment on. We would ask the BLM to review and protect the wilderness characteristics of each of the following areas, and propose as Wilderness Study Areas those that are not WSAs already. - BLM land immediately adjacent to Canyon Wilderness, along Camp Ridge and Sowbelly Ridge. These sweeping unroaded uplands provide important wildlife habitat and dramatically scenic views, thus would be an appropriate addition to the existing wilderness.
1836	All lands in Uncompahgre Field Office that are also components of Colorado's Canyon Country Wilderness Proposal (the citizen's BLM wilderness inventory), including: -- Adobe Badlands--This absolutely unique, sparse landscape northeast of Delta. The fragile soils and striking scenery here, rare in that it has not been damaged by motor travel, needs to be preserved. -- Norwood Canyon--This rugged and ecologically vibrant area in the heart of the San Miguel River corridor provides some of the better and more diverse habitat anywhere for mountain lions, hawks, eagles, and both rare and familiar native fish. This riparian area along the river has been classified as one of two most important river systems needing protection in Colorado. -- Roubideau (Camel Back)--This maze of colorful and intricate canyons provide the obvious complement to the national forest Roubideau Area, already designated by Congress to protect its wilderness values. The downstream portion should receive the same protection from the BLM until Congress can complete the watershed's designation.
1838	The Monitor Creek Canyon is being recommended in the DeGette bill and also by the conservation community to be added to the Camel Back WSA and the Roubideau Special Management Area on FS lands. Altogether these would make a great, large roadless, non-motorized, rugged, remote wildlife and quiet use area.
1839	Potter Canyon/Monitor Creek--Due to their relatively undeveloped character in a heavily roaded landscape, Subregions A and B lend themselves to a "Quiet Use" designation and should include horse and hiking trails only, along with places where trails are absent altogether. This will reduce habitat fragmentation and preserve the silence and remoteness of these canyons. We do not believe that introducing ATVs and mountain bikes into this area is appropriate given how difficult it is to contain the spread of these vehicles, how relatively wild the area still is, and the availability of ample motorized and mountain bike opportunities nearby. Potter/Monitor is also prime big horn sheep habitat. A small herd is frequently spotted here. We understand the Potter Creek Road was closed by the DOW in 1991 to protect the sheep.
1840	The Dolores River Basin-- These river lands represent some of the most colorful and spectacular wild lands in the state. Geological formations millions of years in the making, healthy river systems and unspoilt desert all provide a pristine environment for wildlife, including the endangered peregrine falcon, mountain lions and river otters. Much of this land has been identified by Colorado conservationists as prime lands for Wilderness protection. These lands are prized for their outstanding natural values and recreation opportunities by people across the nation. But their future is uncertain, threatened by uranium mining, oil and gas development, and growing off road vehicle use which could permanently damage the land's natural character. We urge you to take the necessary steps to protect this area.
1841	Tabequache SMA--We would recommend that the SMA be expanded to add the Shavano, Campbell, and Burro Creek drainages north of the Tabeguache Special Management Area to the SMA. This would be a logical extension of the SMA and, combined with the large roadless area on adjacent Forest Service lands, would create a sizable chunk of unfragmented wildlife habitat. Closing a few existing roads and a nonmnotorized/nonmechanized prescription would make the area an enjoyable hiking and horse area and provide more security to wildlife. Local mtn. bike groups are pressing for trails inside the Tabequache SMA even though the BLM is actively managing it like actual wilderness, with horse/hiking use only. We thank the BLM for their current nonmechanized policy and ask to reinforce them and keep the policy in place.
1842	Sewemup Mesa Ð 9,253 Acres Within Uncompahgre Resource Area. The majority of this CWP falls within the

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	Grand Junction Field Office; however, nearly 10,000 acres are managed by the Uncompahgre Field Office. Sewemup Mesa is one of the most ecologically pristine areas in western Colorado, having been isolated from development and most human activity throughout history. The Colorado Division of Wildlife has identified the area as suitable habitat for Mexican spotted owl, southwest willow flycatcher, whooping crane, and the western burro owl.
1844	Nyswonger Mesa-- Has remarkable possibilities of archeological importance as well as scenic and quiet recreational opportunities. Energy exploration and OHV activities are real threats to the environmental qualities of the area and the BLM RMP should recognize the importance of keeping such development contained in such a way that possible disturbance is not a threat.
1845	Lands with wilderness characteristics should be closed to motorized and mechanized use. Those lands, as well as potential wild and scenic river corridors, should be closed to all forms of energy development and transmission. Protecting these lands has the added benefit of helping protect wildlife habitat, cultural resources, and mitigating the impacts of climate change.
1860	Wilderness Quality Lands in the Dolores River Corridor. BLM has both the obligation and the authority to protect lands with wilderness characteristics. The BLM's Uncompahgre Field Office contains portions of one Wilderness Study Area (WSA), the Dolores River Canyon WSA, as well as proposed additions, in the form of Citizen's Wilderness Proposals (CWPs) to both the Dolores River Canyon and Sewemup Mesa WSA. Both the WSA lands and the proposed additions should managed in order to protect their wilderness characteristics. If managed in this recommended manner, WSAs and CWP lands in the Uncompahgre FO will not only remain available for possible future designation as Wilderness, but will also ensure and expand the opportunities for backcountry recreationists to experience a sense of adventure and discovery. Inventory reports of these areas are attached, which include maps.
1861	Dolores River Canyon WSA & CWP Expansions: This heart of the stunning and wild Dolores corridor, the Dolores River Canyon Wilderness Study Area, with towering colorful sandstone cliffs, river otter, peregrine falcon, and outstanding opportunities for remote wilderness experience must gain the highest possible level of protection. The portion of the Dolores River Canyon Wilderness Study Area within the Uncompahgre Field Office should continue to be managed to protect its wilderness qualities, and BLM should also analyze and manage the Citizen Proposed additions to the WSA so as to protect their wilderness characteristics. In the1985 San Juan/San Miguel Planning Area Resource Management Plan, the BLM recommended the Dolores River Canyon WSA as suitable for wilderness designation. The area possesses the same qualities now that led to the suitability finding in the past. We urge to the BLM to reaffirm the recommendation of the Dolores River Canyon WSA for designation. On page 15 the 1985 RMP states: The Dolores River Canyon WSA is being recommended as preliminarily suitable for wilderness designation, primarily because it possesses highly outstanding characteristics for primitive and unconfined recreation, solitude, and naturalness, as well as scenic grandeur and superb wilderness characteristics. It is a nationally unique area and is worthy of preservation in its natural state. The nationally significant values associated with Dolores River Canyon WSA include: (1) Formerly a Wild and Scenic River candidate as recommended by an interagency study report in 1976 and recommended to Congress for protection on several occasions; (2) Outstanding primitive and unconfined recreation opportunities associated with the river, canyons, and mesas; (3) Unique plant and animal communities found within the WSA that contain threatened and endangered species habitat; and (4) Extremely diverse topography and geology that create outstanding scenery, vistas and excellent solitude opportunities. This unique combination of factors, found only in the Dolores River Canyon WSA, creates the specific need and rational for BLM to recommend this area as preliminarily suitable for wilderness designation.
1862	The Sewemup Mesa WSA & CWP Expansions: The Sewemup Mesa CWP combines the Sewemup Mesa WSA with citizen proposed expansions. While the WSA itself falls in the Grand Junction Field Office, a significant proposed addition crosses into the Uncompahgre FO, including Carpenter Flats and Beehive Canyon. The boundaries have been drawn to exclude significant land impacts and to aid in manageability. While citizens did identify a number of routes (most likely developed by prospectors) within the Carpenter Flats and Beehive Canyon portions of the CWP, it was determined that these routes do not meet the criteria of a road as they are not maintained or regularly used. A detailed account of these routes can be found on pages 10 and 11 of the "Sewemup Mesa Citizens' Wilderness Proposal: Wilderness Inventory Report" which has been previously submitted to your office, and also is included as an attachment. The Sewemup Mesa CWP expansions create a cohesive landscape of diverse canyon systems with smaller systems such as Beehive Canyon offering the most

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	intimate of wilderness experiences. Portions of this CWP expansion falling within the boundary of the Uncompahgre Field Office should be considered in combination with wilderness quality lands in the Grand Junction FO and be managed for their wilderness characteristics. In the 1987 Grand Junction Field Office Resource Management Plan, the agency found the majority of the Sewemup Mesa WSA to be suitable for Wilderness designation, including the very small portion in the Uncompahgre Field Office. The area possesses the same qualities now that led to the suitability finding in the past. We urge the UFO to reaffirm their support of the GJFO's findings that the portions of the Sewemup Mesa WSA with the UFO are suitable for Wilderness designation. On page 37 the 1987 RMP states: "Sewemup Mesa WSA (18,835 acres) [including acreage in Montrose County] is recommended preliminarily suitable for wilderness designation wilderness because [it] possess outstanding wilderness characteristic including sufficient size, naturalness and outstanding opportunities for both solitude and primitive and unconfined recreation. Additionally, [this] WSA possess high quality ecological, geological, scientific, educational, scenic and cultural values. [This] WSA will be outstanding representatives of the Colorado Plateau Physiographic Province in adding to the landform and ecological diversity of the National Wilderness Preservation System. [The area has] minimal resource UFO Scoping Comments, Dolores River Corridor 5 conflicts. Very strong public support, from both the region and nation, has been shown for wilderness designation of [this] WSA. Specific boundaries for this WSA are shown in Appendix I of the draft RMP EIS."
1908	Many stakeholders believe BLM should embed a ongoing inventory and protection of lands with wilderness characteristics. Unlike the US Forest Service, where direction from Congress provides the direction to inventory for wilderness during the revision of each Land Use Plan, this is a very controversial idea for BLM lands.
1909	Comment: Congress gave very specific instructions to the BLM regarding Wilderness. Those instructions are contained in Section 603 of FLPMA. Congress instructed the agency to inventory all of their lands, identify which were definitely not of wilderness quality and then to begin an intensive inventory and analysis to determine which of the remaining lands would be recommended for inclusion into the National Wilderness Preservation System. The process was completed in 1991. All stakeholders (including Wilderness Advocacy Groups) have exhausted the protest and appeal options. After 10 years the "603 Process" left Utah with approximately 3.2 million acres designated as Wilderness Study Areas. Of those, approximately 1.9 million acres were deemed "suitable and manageable" and were recommended to Congress for Wilderness designation. Section 603 requires the BLM to manage WSAs in such a manner so as to not impair the suitability of such areas for preservation as Wilderness, subject to existing uses. 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 WSAs, the BLM should have no part in this issue. To do so is a tragic loss of management resources.
1910	Comments regarding the potential utilization of the 1999 Preliminary Wilderness Character Inventory Evaluation. 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. Please see comments below.
1911	It is improper to make decisions based upon an inventory for a single resource value. BRC acknowledges that the agency can inventory to its heart's delight. This includes inventorying for resources or values associated with Wilderness. Our concern is how the inventory will be used in the decision making process for the Bangs Canyon Implementation Plan. Whenever making any land use planning decisions, the agency must comply with its congressional mandate to inventory for the "global" range of resources. The agency must not make decisions based on incomplete inventories, or inventories based on a single resource value. Making a decision to manage an area in a primitive recreation class because the area has been identified to have "Wilderness Character" via the 1999 Inventory is no less appropriate than making a decision to implement a full field development for oil and gas based solely on inventories for mineral and oil and gas resources. 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

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	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.
1912	Regarding the lack of public involvement in the 1999 inventory. One serious concern with utilizing the 1999 Inventory has to do with the lack of public involvement in the development of inventory criteria. These are not merely semantic arguments. These concerns are directly related to the agency's Congressional mandates and obligations to the public when developing management plans. BRC understands that the criteria used in the 1999 Inventory was identical to the "Utah Wilderness Review Procedures." Those procedures were modeled after the original Wilderness inventory, which had a number of requirements for public and local government involvement. In fact, the 1999 Wilderness review process was so closely modeled after the original one that large parts of the original inventory handbook are reproduced verbatim. Yet the term "public involvement" and similar terms have been purged from the review document. In fact, although the original Wilderness Inventory Handbook acknowledged the importance of public involvement when inventorying for Wilderness characteristics, the 1999 Wilderness inventory criteria and procedures went out of its way to eliminate public involvement. The original Wilderness Inventory Handbook (The Wilderness Inventory Handbook formulated for the inventory pursuant to FLPMA § 603, hereafter referred to as the WIH) on page 5 notes that: "The wilderness inventory process requires full public involvement." This public involvement "is particularly important because the criteria in the wilderness inventory process call for judgments that can be highly subjective. In recognition of that fact, the BLM wilderness inventory process will be conducted as openly as possible with the broadest opportunity for input from all concerned, in order to arrive at a sound decision." This is precisely correct, and it's also precisely why the 1999 Inventory is fatally flawed. The agency, when formulating inventory criteria during the original Wilderness inventory, understood that, unlike inventories for plant and animal species, or oil and gas potential, qualities that make up "Wilderness characteristics" are extremely subjective. The process had become no less subjective and the task of doing a professional inventory no less difficult in 1999. Full public and intergovernmental comment, review and involvement were every bit as necessary as they were in the first inventory. The BLM's claim that the only section of FLPMA that applied during their re-inventory for "Wilderness character" was section 201, and therefore these important public involvement provisions do not apply, is clearly wrong. Numerous sections of FLPMA and NEPA require full public involvement and participation of State, Local and Tribal officials. The lack of public involvement in formulating the criteria for the 1999 Inventory has produced a flawed result.
1913	The 1999 inventory criteria and procedures contained significant changes from the original WIH, and should have been open for public review and comment. Changing the criteria and procedures without public involvement resulted in a flawed inventory. Secretary Babbitt stated that his re-inventory team "is explicitly instructed to apply the same legal criteria that were used in the original inventory." The re-inventory procedures document clearly shows that was not done. The "Utah Wilderness Review Procedures" adopt some of the guidelines and requirements laid out in the original WIH and the Organic Act Directives (OADs). The Interior Department maintains that the re-inventory procedures are the same as the previous ones, thereby fulfilling Secretary Babbitt's commitment to the Utah's Congressional Delegation that the re-inventory team "is explicitly instructed to apply the same legal criteria that were used in the original inventory" to his re-inventory effort. However, the "Utah Wilderness Review Procedures" selectively adopts certain paragraphs and sentences from the original documents, and even then often changing their arrangement or dropping and adding sentences. Secretary Babbitt had in fact created in the "Utah Wilderness Review Procedures" a new document without any public involvement or opportunity for review and comment. A fundamental question should be asked of the BLM: if you were committed to using the same legal criteria as in the original inventory, why did you not use the original Wilderness Inventory Handbook? Why come up with something new? Looking at the new re-inventory document, there appears to be a simple answer. Secretary Babbitt never intended to do the inventory under the same legal criteria used in the first one. These factors, along with handpicking a re-inventory team led by, and heavily loaded with, BLM bureaucrats who are unabashed Wilderness advocates, underscores yet again that the 1999 Inventory was a purely political exercise. It simply was not designed to result in a useful or accurate review of the land being re-inventoried. Two Examples: Two examples, one dealing with "naturalness" and the other dealing with "outstanding opportunities for solitude," illustrate the major deficiencies in the 1999 inventory as a result of changing the criteria and procedure without public review

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	and comment: The WIH and OADs misapplied the Wilderness Act by giving emphasis to appearing natural as opposed to being natural, which was the prerequisite condition in the Wilderness Act. In determining naturalness, the WIH focuses on the requirement that it must be possible to "observe the area as being generally natural," This trend away from the intent of the Act is virtually complete with the "clarification" in OAD number 2, page 4, for field personnel to use in determining naturalness: "There is an important difference between an area's natural integrity and its apparent naturalness. Natural integrity refers to the presence of absence of ecosystems that are relatively unaffected by man's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus man-affected ecosystems in a given area. As reflected in the handbook, the presence or absence of apparent naturalness (i.e., do the works of man appear to be substantially unnoticeable to the average visitor) is the question the inventory must assess." The re-inventory document continues the move away from the original intent of the Wilderness Act with one significant change. The re-inventory document rewrites the last sentence: "The presence or absence of naturalness (i.e., do the works of humans appear to be substantially unnoticeable to the average visitor?) is the question the Wilderness Act directs the review to assess." At the stroke of a pen, the re-inventory document redefines the general term "naturalness" (as opposed to "apparent naturalness" in the OAD) to be whether "the works of humans appear to be substantially unnoticeable to the average visitor" and then attempts to make it the sole test the Wilderness Act requires for an area to pass the naturalness test. This evolution (or more properly devolution) in the standard of what is natural has obvious advantages to those wishing to find Wilderness characteristics where the Wilderness Act standard would recognize none. The subjective problems with determining "naturalness" pale beside those the BLM inventory procedures create for determining whether an area has the required "outstanding opportunities for solitude or a primitive and unconfined type of recreation" as the Wilderness Act requires. By its nature, the determination of "outstanding" requires some type of comparison. The WIH defines the term "outstanding" as "standing out among others of its kind; conspicuous; prominent; superior to others of its kind; distinguished; excellent." Yet the Utah review document specifically prohibits comparing areas. Page 6, 3 (b) of the re-inventory procedures document states: "Each review unit must be assessed on its own merits as to whether an outstanding opportunity exists; there must be no comparison among units. It is not permissible to use any type of rating system or scale--whether numerical, alphabetical, or qualitative (i.e., high-medium-low)--in making the assessment. Good judgment must be used in determining that outstanding opportunities either do or do not exist in each unit. This is a subjective determination and should be made only after a careful assessment of a unit." So, in total contradiction of the clear intent of the Wilderness Act, which defines Wilderness as "an area of undeveloped federal land...which...has outstanding opportunities for solitude or a primitive and unconfined type of recreation," the BLM manuals specifically prohibit the comparisons which are the only way to determine if an area truly does offer outstanding opportunities! On p. 5 of the re-inventory document in the section dealing with "naturalness," paragraphs 2 (a) (1) and (2) are reproduced almost word for word. In the original WIH, however, there was a paragraph between these two: "Those parts of the inventory unit where the imprint of man's work is substantially noticeable will be eliminated unless the area meets all the other qualifications required and could, under certain conditions, be returned to a natural state. This instance is described later on in these procedures." The first sentence in the next paragraph in the WIH reads: "Therefore, to qualify as Wilderness, an area may include some imprints of man's work provided they are substantially unnoticeable." The re-inventory document presents this sentence as: "An area may include some human impacts provided they are substantially unnoticeable in the unit as a whole." Note the addition of the phrase "in the unit as a whole." The closest thing to that in the previous inventory document is a sentence in OAD 2, page 5: "Minor imprints of man must be evaluated as to whether individually they are substantially unnoticeable in the overall unit." The sentence, which followed in the OAD, was also omitted from the re-inventory document. However, it offers additional guidance which was used on the first inventory and which unquestionably would make a difference in evaluating an area depending on whether it was part of the re-inventory directive or not. It states: "Such minor impacts must also be evaluated as to their cumulative affect on an overall unit, both in connection with major impacts or by themselves." Clearly, the re-inventory document has a much lower threshold for what qualifies as "natural" than the one applied in the original inventory. A similar situation is the exclusion of two key paragraphs in the WIH. The re-inventory document reproduces the intent of this paragraph from page 13 of the WIH nearly word for word when it states: "Human impacts outside the review unit will not normally be considered in assessing naturalness of a unit. However, if an outside impact of major significance exists, it should be noted in the overall unit description and evaluated for its direct affects on the review unit. Human impacts outside the area should not automatically lead to a conclusion that a review unit

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	lacks wilderness characteristics." However, the WIH continues with the following two paragraphs: "The number, size and distribution of the imprints of man's work to the overall size of the unit should be considered in making the final naturalness determination. For example, in larger roadless areas, more or greater impacts may be more acceptable than in smaller areas. After all impacts are considered, a determination must be made as to whether their overall impact on the landscape is or is not substantially unnoticeable. Photographs supporting impact descriptions and evaluations will be beneficial." The significance of omitting the first of these two paragraphs is that it clearly introduces a "dilution component" to the Wilderness inventory. It states that the size of the unit is a key factor in determining the significance of a human imprint to the over all unit. The corollary is that the outstandingness of an area in terms of offering opportunities for solitude and a primitive and unconfined recreation is also affected by the size of the area, as outlined in the example of the 900 acres of outstanding land in a 1000 acre unit and 100,000 acre unit explained above. Another example occurs in the re-inventory document on page 8 at 4 (C). The first sentence is taken almost word for word from OAD 2, page 5. It reads in the re-inventory document: "Where substantially noticeable human caused impacts occur within a review unit, reviewers should consider the opportunity to adjust the unit boundary to exclude the human impacts." The OAD goes on to direct that: "Major imprints of man which are substantially noticeable should not be carried forward as part of an inventory unit receiving further Wilderness review." This sentence was dropped from the re-inventory document.
1935	BLM should remove the following areas from the "not suitable" for wilderness category and place them in the "suitable" for wilderness category in the revised RMP: • Adobe Badlands Wilderness Study Areas (WSA); • Camel Back WSA; and • the section of the Tabeguache Area that is in the UFO. We urge BLM to actively work with Congress to promote passage of legislation to designate these WSAs and the Tabeguache Area as wilderness.
1936	The UFO encompasses approximately 900,000 acres of publicly owned lands. These lands are required by law to be managed for multiple use and sustained yield, such as grazing, mining, timber harvesting, and recreation. One popular form of recreation includes the use of wilderness to provide opportunities for solitude and primitive, unconfined recreation in protected roadless areas. Wilderness users enjoy hiking, camping, fishing, hunting, horseback riding, wildlife viewing, and photography. Wilderness designation also provides BLM with a tool for protecting rare plant communities and wildlife habitat. Currently 83,520 acres, or nine percent, of the UFO have been designated as wilderness. If the Adobe Badlands WSA, Camel Back WSA, and the Tabeguache Area are designated as wilderness, total wilderness acreage will increase to 121,587 acres, or 14 percent, of the total UFO acreage. At the RMP Open House held in Hotchkiss on February 12, Citizens for a Healthy Community learned that with the exception of the currently designated wilderness areas, WSAs, and the Tabeguache Area, no location in the remaining 780,000 acres of BLM land in the UFO is farther than approximately 1 mile from a road. With 86 percent of the landscape available for grazing, mining, timber harvesting, and off-road recreation, it seems reasonable and prudent that a management plan that emphasizes balanced multiple uses would include 14 percent of the landscape for non-motorized activities in a roadless landscape.
2019	Wilderness/WSAs Add Monitor Creek to Camel Back WSA RMRI recommends adding Monitor Creek and the rest of Potter Creek Canyon to the Camel Back WSA and Forest Service Roubideau SMA. This interconnected canyon system is one of the wildest, quietest, most untrammeled areas in the region and deserves the highest level of protection. We very much appreciate that Preferred Alternative 2 in the Dry Creek TMP kept these canyons in their wild, unmotorized state and strongly urge you to keep them so, as we believe the highest and best use of these canyons is to retain their silence and solitude as a future wilderness.
2031	As more people move into the communities around the Lower Dolores and as more recreationists learn about the area, the potential for increased development, both recreational and commercial, threatens to chip away at and permanently alter the amazing resource we all have in the Dolores Basin. Action needs to be taken now to ensure that the numerous qualities of the Lower Dolores River are sustained into the future, or it will be too late. Planning processes such as this one are the first step in ensuring that the Lower Dolores will be enjoyed by generation to come.
2033	Wilderness Quality Lands in the Dolores River Corridor BLM has both the obligation and the authority to protect lands with wilderness characteristics. The BLM's Uncompahgre Field Office contains portions of one Wilderness Study Area (WSA), the Dolores River Canyon WSA, as well as proposed additions, in the form of Citizen's Wilderness Proposals (CWPs) to both the Dolores River Canyon and Sewemup Mesa WSA. Both the

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	WSA lands and the proposed additions should managed in order to protect their wilderness characteristics.
2035	The portion of the Dolores River Canyon Wilderness Study Area within the Uncompahgre Field Office should continue to be managed to protect its wilderness qualities, and BLM should also analyze and manage the Citizen Proposed additions to the WSA so as to protect their wilderness characteristics.
2036	In the1985 San Juan/San Miguel Planning Area Resource Management Plan, the BLM recommended the Dolores River Canyon WSA as suitable for wilderness designation. The area possesses the same qualities now that led to the suitability finding in the past. We urge to the BLM to reaffirm the recommendation of the Dolores River Canyon WSA for designation
2037	The Sewemup Mesa WSA & CWP Expansions; The Sewemup Mesa CWP combines the Sewemup Mesa WSA with citizen proposed expansions. While the WSA itself falls in the Grand Junction Field Office, a significant proposed addition crosses into the Uncompahgre FO, including Carpenter Flats and Beehive Canyon. The boundaries have been drawn to exclude significant land impacts and to aid in manageability. While citizens did identify a number of routes (most likely developed by prospectors) within the Carpenter Flats and Beehive Canyon portions of the CWP, it was determined that these routes do not meet the criteria of a road as they are not maintained or regularly used
2038	The Sewemup Mesa CWP expansions create a cohesive landscape of diverse canyon systems with smaller systems such as Beehive Canyon offering the most intimate of wilderness experiences. Portions of this CWP expansion falling within the boundary of the Uncompahgre Field Office should be considered in combination with wilderness quality lands in the Grand Junction FO and be managed for their wilderness characteristics.
2039	In the 1987 Grand Junction Field Office Resource Management Plan, the agency found the majority of the Sewemup Mesa WSA to be suitable for Wilderness designation, including the very small portion in the Uncompahgre Field Office. The area possesses the same qualities now that led to the suitability finding in the past. We urge the UFO to reaffirm their support of the GJFO's findings that the portions of the Sewemup Mesa WSA with the UFO are suitable for Wilderness designation.
2048	Not only is the river spectacular from an ecological, scenic, and recreational standpoint, the Dolores has also been found suitable for W&S designation since the 1970s
2069	The boundaries nevertheless show how rare and isolated these less roaded lands are, suggesting in itself that they bear further study as potential wildlife and quiet use areas.
2094	This Forest Service roadless area in combination with the Tabeguache SMA forms one large, undeveloped wildlife security area that includes Spruce Mountain and a prized big game hunting area adjacent to the SMA on the north. The area is in Game Management Unit 61, one of the most sought after hunting units in Colorado. And much of the area appears to border an elk winter concentration area on the GIS elk map enclosed.
2097	The western boundary drawn on the map has been extended to Long Mesa to incorporate a piece of the Potential Conservation Area. Providing a nonmnotorized/nonmechanized prescription for this entire area represents an important opportunity to safeguard an unusually large and rare chunk of diverse and unroaded land, as BLM and Forest Service lands surrounding Tabegache are densely roaded everywhere else.
2122	As mentioned, the boundaries sketched on the map are highly impressionistic and conceptual. They are presented merely as a suggestion for how the BLM could set aside less roaded lands as a way of mitigating the severe habitat fragmentation that characterizes this region
2188	We urge you to preserve BLM land for future generations and to favor the following low-impact uses: Wide open, rugged, remote backcountry/landscapes/open spaces.
2190	We urge you to preserve BLM land for future generations and to favor the following low-impact uses: All wilderness study areas
2211	Camel Back Camel Back needs permanent protection by wilderness designation. Camel Back supports bighorn sheep and is as remote and beautiful as Dominguez Canyon. Consideration should be given to incorporating adjacent Roubideau Forest Service lands into the wilderness area. This is one of the most important areas to our members.
2212	Although we are aware that the UFO did not find the Adobe Badlands suitable for wilderness designation, we believe there is enough significance to this remnant landscape that it is deserving of permanent wilderness

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Comment ID	Comment
	protection. It contains imperiled endemics, and fragile Mancos shale formation. The Adobe Badlands WSA is the last untouched example of this habitat type in the UFO and possibly anywhere on the Western Slope. If not protected by wilderness designation, then none of this type of landscape will be protected. Because of increasing development pressure, particularly from gas development, this area will be heavily degraded without wilderness protection
2213	Dolores River Canyon and Sewemup Wilderness Study Areas We continue to recommend that the BLM advise Congress, when the opportunity arises, to grant full wilderness protection to these areas.
2214	Tabeguache Special Management Area We commend the BLM's management of this area as non-motorized and non-mechanized. The Tabeguache Special Management Area overlaps with a Potential Conservation Area recommended by the Colorado Natural Heritage Program for protection of sensitive plant communities. It is not suitable for mechanized travel and should be managed for its valuable wildlife habitat and hiking opportunities.
2298	It has come to my attention that the Uncompahgre field office seems to agree with extending wilderness into potter basin. TMW put a lot of time and grant money into establishing a new trail through Chriswell basin Forest service land. This trail is totally dependent on an approximately 2 mile BLM access around the north end of 7N mesa. This and the Jeep-ATV road through Potter Basin is the link to this trail loop. Please help us stop this travesty from becoming reality. This rout was part of my comments on the Dry Creek travel plan so I know you were aware of this if you read my comments.
2321	Perhaps some day we can develop the technique to take a peak at these wonders and not damage nature and our heritage at the same time. Please work toward that day!
2323	As our nation's population grows, it will be ever more important to protect our wild lands and watersheds, to insure that we have clean water and space to "recharge" ourselves away from populated areas.
2324	The protection of wild places should be at the center of the BLMs focus every day.
2334	The Dolores River Basin in southwestern Colorado represents some of the most colorful and spectacular wild lands in the state. Geological formations millions of years in the making, healthy river systems, and unspoilt desert all provide a pristine environment for wildlife, including the endangered peregrine falcon, mountain lions, and river otters. Much of this land has been identified by Colorado conservationists as prime lands for Wilderness protection.
2336	Even if every person can not make a pilgrimage to such sacred places, they must be protected, in perpetuity, as a powerful source of solace in this increasingly polarized and unstable world. The important thing to remember is that once these areas are mangled by so-called "development", they can never again offer these important natural resources. There will be no escaping the madness of civilization, no way of determining an understanding of where we have come from, and where we are going. Certainly, there are those, few to which these concerns are seen as mere impediments to the amassing of private fortunes, but at what cost to the spiritual and emotional health of the nation?
2343	I am concerned about Colorado's wild lands. I have been to Colorado twice in my life (Denver and Colorado Springs), and it is absolutely beautiful and worthy of conservation.
2350	This is my backyard, and I know and love this part of the world. I realize that some energy development is necessary, but when all the resources have been sucked dry, it is essential that this area will have retained it ecological integrity and its wild and remote beauty.
2353	This most beautiful, soul restoring, place must not be SOLD OUT. Please..
2355	This land needs protection from short term profiteers that will surely spoil the land in their use of it. They always have, no matter what they claim. Please let this area be left wild and free.
2360	It is imperative that we protect these beautiful wildlands for future generations. Thank you for your consideration.
2362	It is very unlikely that I will ever visit this area. However, I realize how important it is to keep areas like this for environmental benefits as well as a place for wildlife to survive and people to regenerate themselves. There are so few areas like this left it is critical that the few remaining be untouched.

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2368	These areas, like others scattered throughout the U.S., that have escaped development due to their remove from centers of industrialization, now have a value far beyond what anyone might have thought in previous times. They represent the original patrimony of the States in which they are located, and an irreplaceable resource for the citizens of the State. Do not allow temporary short term monetary benefits to tempt those responsible for protecting the lands, into selling out to a process which will degrade and devalue these places, and leave the citizens of the state with a huge pollution, erosion, and water quality problem, and wipe out the wildlife and natural plant life of these fragile ecosystems.
2370	Most people will ask you to emphasize resource protection in this RMP, while I would like to see us leave the place alone completely
2374	This is a unique natural resource. Once it is developed it is gone. Please keep this uppermost in you thinking while making this decision.
2375	Please help preserve these lands for future generations.
2377	There is a problem here--it is postmodernists: those who refuse, for whatever reason, to accept the reality of space-time. The sub-portion of space here is that of a wilderness ecozone. This is a habitat for wildlife, not for offroading thrill-seekers, noisemakers and scofflaws.
2379	This is an eco-zone, so designated long since and in need of major protection for the animals, birds, reptiles, plants, insects and organisms living there so these can be preserved in perpetuity as the denizens or a wild area that humans can also enjoy on its terms, not those of minds lacking respect for the special character of a 'reserved" region.
2383	Our wild places are getting rarer and rarer. I love the wild areas of Colorado
2386	It is absolutely essential that we protect our wild lands and all the living creatures that call them home.
2387	As I have aged I have seen many large partials of open land become housing tracks, shopping malls or just mowed over in the name of progress. I think every square inch of open land is in need of protection at this point in time. Our population grows and our resources dwindle. It's a matter of survival for us and other species to live on
2388	The whole point of wilderness is just that WILD-NESS. Its too late to fix things when they go bad. Best to protect our national treasures. We need quiet, as close to unused spaces as we can get. Its important to our souls and to the future health and care of our planet, to which we owe a great deal, in case you wondered. Any added benefits? Great. The resource first, people second. We have our houses, cities and workplaces. Profits are not the point of wildness. Its kindergarten decisions. I hope you've all been to kindergarten
2390	As civilization spreads across the land, we need natural areas for wildlife, for quiet, for plants and native animals to live
2392	I'm commenting on the Uncompahgre RMP revision. My wife and I want a large part of this area set aside to protect wilderness-quality lands, wild rivers, and opportunities for quiet, backcountry recreation.
2397	Wildlife habitat, native lands, and wild rivers are also important aspects of this part of Colorado. I was fortunate to visit it a couple of years ago while on my honeymoon. It was a treasured experience.
2404	We have been reckless, careless, selfish, and thoughtless up to this point in our use of natural resources. Thank you for helping us sustain our wildlife sanctuaries areas with your protection of these marvelous lands while we still have some. Thank you so very much.
2411	The BLM needs a thorough management plan as part of the RMP to make sure that planning is done carefully with wilderness and wildlife in mind. Lands with wilderness characteristics should be closed to motorized and mechanized use. These lands should not be open for drilling of any kind.
2412	I spent time years ago...in/around Paradox, CO to Gunnison, CO. What makes these areas special is the lack of human development.
2414	I have written to you even though I do not live in the United States of America because natural areas and native species have an intrinsic value and are of importance to the whole world.
2416	Protecting our once bountiful now diminishing flora and fauna should be a priority to anyone who loves our

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Comment ID	Comment
	land.
2421	Thank you for your attention and interest in this matter. It is important to preserve our wilderness areas and protect them from over-development.
2422	We implore you to give very serious and thorough consideration to the issues raised by The Wilderness Society and other conservation groups and concerned individuals. The Uncompahgre is one of the most outstanding natural areas in this country and one of the last of such relatively pristine quality. Any approved uses which compromise its beauty and wildness will cause irreparable and irreversible harm and result in devastating losses not just to our species but to the many species which will be affected and possibly decimated by ill-advised human decisions.
2423	Thank you for allowing me to send in my comments to you about the Uncompahgre revision plan: please focus on preserving the environmental riches of that area, along with the wildlife and the chance for many people to enjoy that wonderful area in peace.
2424	IN the long term, protection of these valuable lands will yield more public and financial benefit than short term exploitation which causes irreparable harm to the ecosystem and is not a sustainable enterprise.
2425	In Wilderness lies the Preservation of the World.
2426	We must save the wilderness for future generations to enjoy.
2427	I grew up in Colorado and cherish the beauty of it's wild places
2429	These are precious and irreplaceable natural resources.
2430	Let's protect the few remaining pristine lands that we have. Minimal encroachment is just a foot in the door for more encroachment. Lock it down now or we'll lose it forever!
2432	Once this wild and beautiful place is lost it is gone forever. We have a major responsibility to protect this land for its value as wild land, an allly against global warming, preservation of species and a mecca of peace and quiet in an increasingly noisy world. Please do all in your power to protect this area from all development, road building, energy development. We cannot ever get it back so we must protect it now.
2434	We Coloradoans need this land to be maintained as intact as possible. I understand there are many opinions you must weigh, but wilderness can never be restored. It is important to protect as much as we possibly can. We won't get another chance.
2436	I am reminded of a quote from Stewart Udall, "Plans to protect air and water, wilderness and wildlife are in fact plans to protect man."
2437	Once lost, wilderness cannot be recovered. And haven't we lost enough already?
2440	I have visited and loved the Uncompahgre for many years. It is crucial to protect it's special qualities
2444	We now live in FL and long for the beauty, peace and solitude of the Colorado Rockies. Please do not diminish the few wild spaces left!
2445	Please understand, that once development is permitted, the wilderness characteristics will be permanently destroyed.
2446	Please preserve this precious lands.
2448	Please help ensure that the long-term management plan for the Uncompahgre Plateau of southwest Colorado includes strong provisions for the protection of wild places, wildlife habitat, and wild rivers.
2454	These are crucial concerns that need to be addressed with wilderness preservation and sustainability in mind.
2455	I used to life in Colorado and loved the beauty and serenity of the area. Please protect the land and water for my children to see and future generations. Thank you for listening.
2458	I have vacationed in this area with my family for over 20 years and would like to have unspoiled places to take my grandchildren and their children in the future.
2461	Once this land is developed and exploited, it can't be returned to its previous condition. Please do what is necessary to protect this area, not just for us, but for future generations.

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2462	I consider all of these points to be of paramount importance. Protected wilderness is essential to our long-term well being, something we must pass down to future generations in the spirit and tradition of Teddy Roosevelt and Ansel Adams.
2465	Progress has it's setbacks. Once you remove trees and change the Landscaping, more than likely, you can never put it back to it's original God's plan when you realize that you made another mistake called human error. Please leave what God made alone. Thanks for your time and consideration in this matter.
2466	Sir, I strongly urge you to consider that mining & oil & gas development & Off Road Vehicles are highly destructive towards such a wilderness area.
2468	Once land is opened to development or drilling it is lost. You can't put land back to its original condition when you admit a mistake was made in not leaving it alone in the first place.
2469	Wild areas are a necessity for OUR survival too ... not just for the plant and animal life that depends on our management of this earth that we all live on. PLEASE protect these lands. Thanks for all you do ... I know it's a tough job!
2474	Destroying our ecosystems so a chosen few can profit from the non-renewable resources; when all is destroyed, then what?
2475	Prime wilderness lands should be forever. If we compromise them in the face of pressure for extraction of resources and uses that degrade the peaceful and scenic values, we will end up with no wilderness, and no resolution to the insatiable demand for more development.
2476	We have lost so much of our natural Wilderness to development and oil and gas drilling. We must protect what little remains.
2480	As a devoted taxpayer and enthusiast of wilderness, I recognize the critical role that healthy wilderness plays in our nation and our world, both for the sake of wild flora and fauna and for the sake of our human experience.
2483	I have traveled through this breathtakingly beautiful area myself in 2001 and the thought of any kind of commercial use of this amazing wilderness is totally not in keeping with our highest ideals. I urge all of your efforts to protect this incredible jewel for future generations.
2484	I am writing to you today urging that you ensure that the long-term management plan for the Uncompahgre Plateau of southwest Colorado includes strong provisions for the protection of wild places, wildlife habitat, and wild rivers. We would all do well to recall the words of Stewart Udall: "Plans to protect air and water, wilderness and wildlife, are in fact plans to protect man."
2485	Our nation has a severe shortage of pristine wild lands, and they are by far the most valuable resource the Uncompahgre Field Office can deliver to the American public from its jurisdiction
2490	Please continue to do all you can to protect and preserve our precious wildlands. Please!
2491	As a landowner in southwest Colorado, I am very much against further development of wild lands.
2493	Because of the growth of our population, which includes immigration, it is of paramount importance that we keep and maintain our wild spaces just as they are. They provide many benefits from providing a filter for our air; housing what's left of our wild life, to providing solace for our spirit. All forms of pollution should be strictly prohibited!!!
2497	We need to put serious effort into protecting the wilderness and the delicate ecosystems
2499	Please act intelligently by not destroying some of the most beautiful land and wildlife in this country. Thank you.
2502	It is not necessary to sacrifice sensitive lands for the sake of development
2506	I live in Alaska now but come from Colorado. I certainly support protection of all wildlands and wild river systems. Resource development cannot waste our precious wilderness for the riches underground. The riches above ground are ours to enjoy and keep life as we know it around for our children and their children to enjoy. When it is all gone is too late. We have to live by the idea that GOOD PLANETS ARE HARD TO FIND. Which means we must take care of the one we have. Please read the following and act environmentally responsibly. Thank you.
2508	I am writing to urge you to protect the wild lands that are left to us. Thank you for the opportunity to

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Comment ID	Comment
	comment on the Uncompahgre RMP revision. The Uncompahgre Field Office encompasses some of Colorado's most beloved wilderness-quality lands, wild rivers, and opportunities for quiet, backcountry recreation. The resource area is also home to important and imperiled wildlife, such as Gunnison sage grouse, that rely on large intact tracts of habitat free from roads and other infrastructure.
2514	I was raised in the Rocky Mountains in this beautiful pristine state. Please keep it wild and free from exploitation
2522	This is your moment. This is the time you can be an American hero, and e the man your grandchildren and great grandchildren will honor. Save the wildlands and creatures for future Americans. Be brave, stand up and do the right thing
2529	As humankind keeps developing the world to sustain it's reckless burgeoning population growth, our wild places are being sacrificed to greed and short-sightedness. We must preserve what we have now or it will be gone. When we have irrevocably destroyed the balance of nature on this planet, we will have condemned ourselves to become as extinct as the Dodo. Please consider this in all that you do.
2530	While I live in Indianapolis, I have relatives in Colorado. Enjoying the wilderness of that state is always a big part of my visits. Please take all necessary steps to protect these beautiful areas so that we can all continue to enjoy them.
2532	My family came into southwest Colorado in the 1800s. Please protect the incredibly beautiful wild lands and natural areas remaining there
2536	the next RMP plan is of critical importance to protection of habitat and wilderness areas from development, from expanded use of off road vehicles and destruction of fauna in pursuit of natural resources
2538	So many of our public lands, forests, and open spaces have already been ruined by development, drilling, OTV/ATV use, and roads! Enough is enough! Our wilderness, forests. and public lands are under threat from so many angles. They desperately need to be protected. Our parks and forests are supposed to be a place of peace and quiet, for us and for the animals who live there. PLEASE let our public lands stay as beautiful and peaceful as Mother Nature intended!! Their future is in your hands! PLEASE help save the wilderness for ALL future generations!!
2540	If we do not save what little wilderness we have left NOW, it will simply be too late. We need this for a true quality of life in a very overpopulated world
2542	We have so many wild areas now threatened by the general population and those who want to make a profit off these lands. Please protect them.
2543	As an avid recreational user of the Uncompahgre area in southwestern Colorado, I urge the BLM to put recreation and preservation first in this area of incomparable beauty
2545	We need land that does not have human greed involved. Big business already has more then enough land to 'harvest' their products. We also have millions of roads to drive on. The thrills of driving on wild land, needs to be curbed. For a small amount of time of thrill driving, we lose lots of life in the forest, desert, and ocean land. There needs to be land that we can't just destroy for our personal pleasure.
2546	I personally believe that any messing with these sensitive wildlands is not acceptable! Leave some land wild and free!
2548	These lands are our legacy to the next generations. What is once developed can never be pristine again. Let's use some common sense, and act as Teddy Rosevelt would have hoped.. or Stuart Udall.
2550	I spend the summer months in this area and know first hand of its beauty and resources and the problems caused by off-road vehicles and over grazing.
2552	Please help preserve our wilderness for our children! Thank you for your consideration.
2554	There are fewer and fewer wilderness areas left in the world.
2556	I prefer extensive unroaded areas where quiet-use recreationists like myself can experience solitude and natural soundscapes and viewsheds.
2561	This is your chance to protect some of Colorado's best wilderness-quality lands for all time. The rivers, the quiet, the critters all are deserving of he Uncompahgre Field Office's attention as prime resource for recreation

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Comment ID	Comment
	& habitat for wildlife
2563	Please protect, conserve and revive the environment, biodiversity, and humanity common habitat. We thank you.
2564	PLEASE, do your best to protect and preserve these wild and pristine areas for us, our children and future generations, not to mention the wildlife that call it "home".
2565	Please keep our wilderness (or near wilderness) natural. NO development, please.
2566	Thank you for updating the Uncompahgre Plateau RMP and for the opportunity to comment. The Uncompahgre includes high-quality wild-lands, pristine rivers, wilderness-level recreation opportunities, and large, tracts of un-fragmented wildlife habitat. It represents the best of the ever-diminishing wild west.
2567	Please conduct a comprehensive, landscape-level analysis of potential Bureau-permitted activities on the Plateau; forever protect irreplaceable, high-quality, terrestrial, riparian, and aquatic habitat; and preserve existing opportunities for low-impact, wilderness-quality recreation.
2568	Please identify all wilderness-quality lands and potential wild-and-scenic river corridors; and close these areas to activities which could compromise their status.
2571	I want MORE quiet wild lands, NOT less, and NO mining of any kind. This land belongs to WE the PEOPLE, NOT greedy developers, who rape our lands for their own greedy PROFIT!
2573	Not just ours, but the world's unspoiled natural resources are vanishing by the minute, and short term exploitation for the profit of the few at the expense of the many as well as our increasingly precious and imperiled environment is unacceptable.
2574	I look forward to applauding the BLM for taking a leadership role in environmental stewardship of our precious wild lands, specifically the Uncompahgre RMP.
2575	We need the quiet wild places much more than we need any of the results of mining.
2576	Let's leave functioning ecosystems to the next generation, so burgeoning populations on earth may be supported.
2578	I urge you to protect the unique and irreplaceable wild land resource. We treasure the solitude, quiet and beauty and the rich wildlife
2582	Please manage the Uncompahgre Plateau with strong provisions for the protection of wild places, wildlife habitat and wild rivers!
2587	We need to save what little remains of America's wildlands for our grandchildren.
2588	I thoroughly believe in keeping all destructive activities Outside the wild areas. The Uncompahgre Plateau is much too beautiful and full of wildlife to be ruined to the point where people cannot go for peaceful enjoyment of what God has given us. We must keep that something that our grandchildren's grandchildren can enjoy as well.
2590	I urge you to preserve this unique area for the future generations. I personally, as a geologist, have spent much time in the Norwood, Dove Creek, Delores, and adjacent environs , all of which would be easily destroyed with the advent of commercialization.
2591	I am a part time resident and all of my close family live in Colorado, this makes it even more important to me to preserve all wildlife and land. I agree with the above. Thank you.
2593	As a former Coloradoan, I know this area and understand the jeopardy it now faces. You have the opportunity to make all the difference on how we move ahead environmentally. Remaining secured, protected, and undeveloped is critical at this point in time.
2595	I mean, aren't there enough loud and garish amusement parks, theme parks, and Disneyland-type attractions around already? Hands off our wild lands!
2596	I have been a resident of the Uncompahgre region at various moments of my life totaling about 15 years in all. This area is so beautiful and still retains a minimum of human impact.
2597	Preserve our wild life and forests, say no to environmental ruination because of economic greed.

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Comment ID	Comment
2599	I have written so many times in support of preserving our precious western wildlands. It troubles me greatly that we still do not understand how important our wilderness areas & the creatures & plants that live within & around them are. Our environment supports us, we cannot live without its intricate wilderness. We must find new ways to live our good lives in cooperation with each other & with our environment. We are all connected, humans, mountains, canyons, ravens & mountain goats.
2600	PLEASE PROTECT OUR LAST REMAINING WILD PLACES, WILDLIFE AND RIVERS.
2603	Please keep our remaining, fragmented wilderness wild, and free from abuse and exploitation by the irresponsible and greedy.
2607	Western Watersheds Project supports conservation and protection of our public lands and asks that, restrictions and analyses as specifically outlined below (bullet points) and based on the science provided in the attachments to these comments. • Protect all wilderness quality lands by closing them to off road vehicles and livestock
2639	Please think of our children and grandchildren when considering protection for these areas. Please don't let short-sighted activities such and oil and gas development mar this amazing landscape.
2642	But then, who am I to tell YOU that our natural resources have to be preserved. We have only one earth with only one land, air and water supply. Once we give away what we have, it is gone forever...unless you have billions of years for the earth to restore itself.
2646	Keep the Uncompahgre clean and prostine.
2651	I vacation here, escaping the big cities in Texas and the noise and pollution caused by tapping the Barnett Shale in my area, because if its beauty. The streams already run reddish here because of our past resource exploitation. Don't ruin it's already fragile beauty.
2653	Let's try to preserve a few traces of our undisturbed public lands please.
2654	As former residents of Colorado, we return frequently for vacations. The Uncompahgre is a favorite place for us. I encourage you to do everything possible to protect it.
2655	As a former resident of Colorado, I would like to comment on the Uncompahgre RMP revision. I know and love this corner of Colorado very well, having worked hard for its conservation and explored much of its backcountry in the 1960s and 1970s. I know that this place is unique and special, and I encourage the BLM to protect its wild places and wildlife to the maximum extent possible
2674	I ask you Dear Mr. Krickbaum.. what legacy will we leave to the future generations? We must save what is left of our wilderness.. no off road vehicles ..no to development for oil.. uranium.. or gas or anything else that would bring any kind of change to this ecosystem it is a world all of it's own.. we know this now.. we are intelligent we are aware of what we do here Sir.. no excuses will be good enough, if we allow destruction to take place.
2676	What we have seen in the past is that private companies that do mining in particular leave the land they have mined in a terrible situation, with residues toxic to the flora and fauna, and so of course to other citizens who cherish the wilderness area. While we realize the need to meet many challenges for our country, we need to keep some set aside as wilderness to sustain our lives along with livelihoods.
2677	Our wild public lands should not be sacrificed for short term corporate profits. Once destroyed, we cannot rebuild wilderness or extinct species. I hope that the BLM will consider fully the need to preserve wild habitats for posterity as they proceed with developing a plan for the area.
2680	On a personal note, I did visit Colorado many years ago and I still tell people about the beauty of the Big Thompson River and Estes Park. I remember feeling like I had been transported back in time. Colorado has created and preserved so much natural beauty. Please do all that you can to see that this does not become undone by those whose interests are not for the good of the land.
2681	On a personal note, I did visit Colorado many years ago and I still tell people about the beauty of the Big Thompson River and Estes Park. I remember feeling like I had been transported back in time. Colorado has created and preserved so much natural beauty. Please do all that you can to see that this does not become undone by those whose interests are not for the good of the land.

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Comment ID	Comment
2683	BLM has a duty to protect these landscapes and resources for future generations and long term adaptability to climatic changes, especially in light of the work done by the Western Governor's Association and others - our survival depends on careful consideration of these issues now.
2684	Every wilderness area, each and every species is vital to the preservation of our great nation's backcountry. Please be knowledgeable and responsible stewards of these resources.
2686	If I had MY WAY, this pristine treasure would be kept pristine to help us and wildlife and natural flora survive…
2688	The bottom line is we owe it to our grandchildren to protect as much wilderness as possible. After all we have borrowed this land from them. It IS the right thing to do.
2696	Please protect this area from ANY type of development!!
2698	I hope all planning will prioritize preservation since that addresses a natural world we cannot replace or do without. I hope decisions made in this process will ensure that future generations can know Colorado's wild lands as we have.
2699	Do the right thing and protect these incomparable lands.
2700	At this point in time any and all efforts need to be taken to PRESERVE our resources
2703	Please keep in mind the protection of these lands as wilderness.
2708	As a wildlife rehabilitator I believe that habitat protection and preservation is the responsible action in a world of increasing human population. The UN projections for 2050 range from about 8 billion to 10.5 billion.
2710	The Uncompahgre resource area is home to some of our most beloved wild places. The BLM must inventory for lands with wilderness characteristics and consider protecting them in the RMP. Lands inventoried as Citizens' Wilderness Proposals, such as the Dolores River Canyon and Adobe Badlands must be safeguarded, and I am asking the BLM to include in the RMP protections for their wilderness values, including closing all wilderness-quality lands to ORVs and energy development.
2712	It would be best if all this development was cancelled altogether. The least they can do is to minimize as much as possible all damaging development.
2716	I bought my home in Dolores, CO because of the diversity, beauty and relatively pristine quality of much of this incomparable part of the San Juan Mts
2718	Thank you for the opportunity to comment on the Uncompahgre RMP revision. I have seen photographs of this area and I was moved by the beauty to be found there.
2721	This land was enjoyed by my Father...who was born in 1895...I hope that we will never see unconscionable development which destroys the beauty and value of the land and animals which depend upon that land for their subsistence. We need to cherish, not destroy through greed and insensitivity to our planet.
2723	We absolutely need to keep this land as pristine as possible for future generations !
2725	I was backpacking in this area 40 years ago and I cannot imagine mining uranium or despoiling it in any way. This cannot be replaced. Nuclear power and uranium are dead. Do the right thing and close these areas to any development.
2727	The Uncompahgre is unique and its quiet and wild backcountry should be preserved as wilderness for future generations.
2733	Protect this unique area! Please do not allow it to be degraded by careless development. Thanks!
2735	I grew up in the Dolores/San Miguel water shed and I can personally attest to the beauty and wildness of the area. I strongly implore that we find a way to protect this area.
2739	We must do everything in our power to preserve habitat and wild natural areas in our country, both for the wild life and for the benefit of those citizens who seek a natural, un-mechanized environment. The Uncompahgre is not exception.
2742	As a child I spent countless summer days hiking and camping in the Uncompahgre wilderness. It is the most beautiful, pristine, and wild part of Colorado. Now, as a parent with two daughters of my own, we return to Colorado, and to that part of the state specifically, to give our daughters the opportunity to experience wild

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Comment ID	Comment
	places at their best and most beautiful. This land needs to be preserved for their children as well.
2752	Colorado is my favorite vacation place--mainly because of the beauty of the state. Please leave it alone for future generations to enjoy.
2754	wilderness-quality lands, wild rivers ? important and imperiled wildlife ? the human/nature interface
2757	Please preserve, & protect this precious land & it's creatures from useless, & senseless purposes. It just would be so heart breaking to see all they beauty of our planet disappear that the Almighty created, for life is just so beautiful knowing we have such places on earth.
2761	I have worked on the Uncompahgre Plateau as a biologist and understand the importance of the area to sustaining western Colorado's biodiversity. I urge you to protect the biological resources of this area with strong management protections written into the plateaus management plan.
2763	There are still lands in Colorado and other western states whose wilderness-qualities should take precedence over other possible uses. This includes the lands being studied as part of the Uncompahgre Field Office RMP.
2769	There are too many places being destroyed now. We've got enough room to live without taking more from wildlife. We need land to sustain our fresh water and air. We land for lots of trees to help with our HUGE carbon footprint. Please stop destroying the wild. Once it's gone, it's gone. We need these wild places for our children and their children and their children.
2771	Too much land has already been taken away by human interests. We need to preserve all that we can.
	Lands with Wilderness Characteristics
2779	BLM must inventory for wilderness character and consider protecting wilderness characteristics in the RMP. The lands governed by the Uncompahgre RMP contain pristine wildlands, including those identified in Congresswoman Diana DeGette's Colorado Wilderness Act. Section 201 of FLPMA mandates that BLM inventory the 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. Wilderness character is a resource for which BLM must keep a current inventory. As the U.S. Court of Appeals for the Ninth Circuit recently held: wilderness characteristics are among the 'resource and other values' of the public lands to be inventoried under § 1711. BLM's land use plans, which provide for the management of these resources and values, are, again, to "rely, to the extent it is available, on the inventory of the public lands, their resources, and other values." 43 U.S.C. § 1712(c)(4). Oregon Natural Desert Ass'n v. Bureau of land Management, 531 F.3d 1114, 1119 (9th Cir. 2008). Therefore, BLM is required to consider "whether, and to what extent, wilderness values are now present in the planning area outside of existing WSAs and, if so, how the Plan should treat land with such values." Id. at 1143. These obligations also apply to WSAs released by Congress, which BLM found to have wilderness characteristics. As the court stated: "wilderness characteristics are a value which, under the FLPMA, the Bureau has the continuing authority to manage, even after it has fulfilled its 43 U.S.C. § 1782 duties to recommend some lands with wilderness characteristics for permanent congressional protection." Id. at 1142. Nationally, BLM has acknowledged the need for new guidance on inventorying for and managing lands with wilderness characteristics and committed to releasing such guidance in the near future. An interdisciplinary DOI review team released its final report and recommendations on the 77 contested leases issued in Utah BLM's December 2008 lease sale2 ("Stiles Report") in October 2009. The Stiles Report noted the lack of national guidance on managing lands with wilderness characteristics and found that this lack of guidance contributes to uninformed 011 and gas leasing decisions, and recommended the guidance be issued soon. The report further recommended that "BLM-Utah review the [recently completed RMPs] in light of this new guidance and make necessary modifications." (pp. 32-33). The Stiles Report includes significant recommendations regarding additional protections that should be considered, including not leasing at all, based on the presence of wilderness characteristics. Specific recommendations include: "Adding an NSO stipulation could allow both mineral development and protection of the wilderness characteristics this land has in common with the contiguous Natural Area" (p. 6); "This parcel should be reviewed using the soon-to-be-released new Wilderness Characteristics Inventory Manual...Additional stipulations may be found necessary after completion of a revised inventory of wilderness characteristics" (p. 7); and "The team recommends deferral to reconsider the impacts

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	on documented wilderness characteristics" (p. 9). Per FLPMA and BLM's current guidance, and in light of the Stiles Report and upcoming guidance, BLM is obligated to inventory for and consider a range of alternatives to protect lands with wilderness characteristics.
2780	Wilderness character is a valuable resource and important multiple use of the lands governed by the Uncompahgre RMP. As discussed above, wilderness is a resource to be inventoried and managed under BLM's multiple use mandate. 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. Through this planning process, BLM should recognize the wide range of values associated with lands with wilderness characteristics: (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. (b) Recreation - FLPMA also identifies "outdoor recreation" as a valuable resource to be inventoried and managed by BLM. 43 U.S.C. § 1711(a). 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. (c) Wildlife habitat and riparian areas - FLPMA acknowledges the value of wildlife habitat found in public lands and recognizes habitat as an important use. 43 U.S.C. § 1702©. 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). The report can be found at http://www.doLgov/documents/BlM_Utah77LeaseParcelReport.pdf. 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. Swanson et al. (1994) contend that managing an ecosystem within its range of variability is appropriate to maintain diverse, resilient, productive, and healthy ecosystems for viable populations of native species. Using the historical range of variability, they believe, is the most scientifically defensible way to meet society's objective of sustaining habitat. Patrick Daigle and Rick Dawson, Extension Note 07; Management Concepts for Landscape Ecology (Part 1 of 7). October 1996. http://www.for.gov.bc.ca/hfd/pubs/docs/en/en07.pdf; citing Swanson, F. 1; Jones, J. A.; Wallin, D.O.; Cissel,l H. 1994. Natural variability--implications for ecosystem management. In: Jensen, M. E.; Bourgeron, P. S., tech. eds. Eastside Forest Ecosystem Health Assessment--Volume II: Ecosystem management: principles and applications. Gen. Tech. Rep. PNW-GTR-318. Portland, OR: U.S. Dept. of Agriculture, Forest Service, Pacific Northwest Research Station: pp 89-106. Identifying, restoring and protecting substantial road less areas in the lands governed by the Uncompahgre RMP can provide crucial benefits to wildlife, especially to endangered and sensitive species. (d) Cultural resources - 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©. The lack of intensive human access and activity on lands with wilderness characteristics helps to protect these resources. The scoping notice for the Uncompahgre RMP identifies managing and protecting cultural, historical and paleontological resources as an issue to be addressed in the RMP. Managing lands to protect wilderness qualities will also help protect cultural and archaeological sites. (e) 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 http://www.census.gov/prodl2008pubs/fhw06-co.pdf). In addition, local communities that protect wildlands reap measurable benefits in terms of employment and personal income. For instance, a recent 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

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	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 Wilderness: Theory and Practice; Loomis 2000, Economic Values of Wilderness Recreation and Passive Use: What We Think We Know at the Turn of the 21 st Century). All of these economic benefits are dependent upon adequate protection of the wilderness characteristics of the lands. (f) Quality of life - The wildlands located within the Uncompahgre planning area 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 the burgeoning urban and suburban areas of Montrose and other growing population centers. Their protection enables the customs and culture of this community to continue. (g) Balanced use - The vast majority of BLM lands are open to motorized use and development. FLPMA recognizes that "multiple use" of the public lands requires "a combination of balanced and diverse resource uses" that includes recreation, watershed, wildlife, fish, and natural scenic and historical values (43 U.S.C. § 1702©). FLPMA also requires BLM to prepare land use plans that may limit certain uses in some areas (43 U.S.C. § 1712). 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.
2781	2. BLM must consider alternatives in the Uncompahgre RMP for managing lands to protect their wilderness characteristics. The range of alternatives is "the heart of the environmental impact statement." 40 C.F.R. § 1502.14. 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. Bob Marshall Alliance v. Hodel, 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. City of Tenakee Springs v. Clough, 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., Kootenai Tribe of Idaho v. Veneman, 313 F.3d 1094,1122-1123 (9th Cir. 2002) (and cases cited therein); see also Envtl Defense Fund., Inc. v. U.S. Army Corps. of Engrs, 492 F.2d 1123, 1135 (5th Cir. 1974); City of New York v. Dept. of Transp.• 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."); Utahns for Better Transportation v. U.S. Dept. of Transp.• 305 F.3d 1152 (10th Cir. 2002), modified in part on other grounds, 319 F3d 1207 (2003); Or. Envtl. Council v. Kunzman, 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). 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 be only one alternative (i.e. the applicant's proposed project)." Colorado Environmental Coalition v. Dombeck, 185 F.3d 1162, 1174 (loth Cir. 1999), citing Simmons v. United States Corps of Engineers, 120 F.3d 664, 669 (7th Cir. 1997). This requirement prevents the EIS from becoming "a foreordained formality." City of New York v. Department of Transp., 715 F.2d 732, 743 (2nd Cir. 1983). See also, Davis v. Mineta, 302 F.3d 1104 (10th Cir. 2002). Given the broad purpose of the preparation of the Uncompahgre RMP and the information compiled by the public regarding lands with wilderness characteristics, the range of alternatives for these lands should include a number of 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, which 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).

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	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 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).
2782	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 WSAs, and we maintain that this agreement is invalid and will ultimately be overturned in pending litigation. The federal court in Utah revoked its approval of the Utah Settlement, stating that its approval of the initial settlement was never intended to be interpreted as a binding consent decree. Recognizing that the court's decision undermined the legal ground for the Utah Settlement, the State of Utah and the Department of Interior have now formally withdrawn the settlement as it was originally submitted. See, Motion to Stay Briefing and for a Status Conference, September 9, 2005, attached. This casts serious doubt upon BLM's current policy not to consider designating new WSAs. There is no binding consent decree and the BLM has not even issued any updated guidance seeking to continue applying this misguided, and illegal, policy. In addition, the Utah Settlement is based on an interpretation of FLPMA §§ 201, 202, and 603 that is contrary to FLPMA's plain language. Section 603 did not supersede or limit BLM's authority under § 201 to undertake wilderness inventories, but rather relies explicitly on BLM having exactly that authority under § 201. Nor did § 603 in any way limit BLM's discretion under § 202 to manage its lands as it sees fit, including managing areas as § 202 WSAs in accordance with the Interim Management Policy (IMP). Every prior administration has created WSAs under § 202 and they plainly had authority to do so. This administration has such authority as well, making this a reasonable alternative deserving of consideration in this NEPA process. The Utah Settlement is also illegal because the court in Utah lacked jurisdiction to prohibit designation of new WSAs nationwide, including in Colorado. 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, including the areas identified with this submission. Further, if BLM fails to fulfill these obligations, it risks violating both FLPMA and NEPA, and jeopardizing the validity of this entire planning process.
2783	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. BLM's recent acknowledgment of this obligation in the Stiles Report and the related court rulings provide important direction in this regard. Further, in previous guidance, BLM has not only claimed that it can continue to protect wilderness values, but has also committed to doing so. On September 29, 2003, BLM issued IMs 2003-274 and 2003-275, formalizing its policies concerning wilderness study and consideration of wilderness characteristics in the wake of the Utah Settlement. In the IMs and subsequent public statements, BLM has claimed that its abandonment of previous policy on WSAs would not prevent protection of lands with wilderness characteristics. The IMs contemplate that BLM can continue to inventory for and protect land "with wilderness characteristics," such as naturalness or providing opportunities for solitude or primitive recreation, through the planning process. The IMs further provide for management that emphasizes "the protection of some or all of the wilderness characteristics as a priority," even if this means prioritizing wilderness over other multiple uses. This guidance does not limit its application to lands suitable for designation of WSAs; for instance, the guidance does not include a requirement for the lands at issue to generally comprise SOOO-acre parcels or a requirement that the lands have all of the potential wilderness characteristics in order to merit protection. 1M 2003-274 states that " BLM may continue to inventory public lands for resource or other values, including wilderness characteristics" and that the agency can "manage them using special protections to protect wilderness characteristics." (emphasis added). Further, 1M 2003-275, Change 1, reads: The BLM can make a variety of land use plan decisions to protect wilderness characteristics, such as establishing Visual Resource Management (VRM) class objectives to guide the placement of roads, trails, and other facilities; establishing conditions of use to be attached to permits, leases, and other authorizations to achieve the desired level of resource protection; and designating lands as open, closed, or limited to Off Highway Vehicles (OHV) to achieve a desired visitor experience. (emphasis added). Accordingly, administrative protection can and should be considered for lands with wilderness characteristics that are not currently protected. The Draft RMP should

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	also consider management alternatives that provide administrative protection for the wilderness characteristics of those lands currently designated as WSAs if they are not ultimately designated as Wilderness by Congress; their wilderness characteristics are already acknowledged by the BLM. Further, BLM is obligated to evaluate the potential impacts on wilderness values from its management decisions. In the most recent ruling on the Utah Settlement challenge (State of Utah v. Norton, Case No. 2:96-CV0870, Order and Opinion (D. Utah September 20, 2006)), Judge Benson found against the Conservation Groups for a number of reasons, including agreeing with the legal interpretation of FLPMA put forth by the State of Utah and the BLM (a finding we continue to dispute). However, the ruling also justifies the court's interpretation by finding that the agency can provide virtually the same protection for lands with wilderness characteristics through administrative decisions as it can through designation of new WSAs, with the only material difference being that, while the agency can alter its own management decisions, only Congress can change a WSA designation. The court stated: "Both Utah and the BLM acknowledge that the BLM has the discretion to manage lands in a manner that is similar to the non-impairment standard by emphasizing the protection of wilderness characteristics as a priority over other potential uses." Order and Opinion, p. 41 (emphasis added - excerpt attached). In a subsequent briefing to the U.S. Court of Appeals for the 10th Circuit, the Department of the Interior and the BLM reiterated that "the settlement does not preclude BLM from inventorying public lands for wilderness-associated characteristics" and that "the land management decision obtained through FLPMA § 202 process may resemble management under FLPMA § 603's non-impairment standard." In discussing how BLM will manage lands with wilderness characteristics, the brief refers to the "BLM's discretion under FLPMA § 202 to preserve their wilderness-associated characteristics." Brief of the Federal Appellees, State of Utah v. Kempthorne, Case No. 06-4240 (February 26, 2007), pp. 40,43 (emphases added - excerpt attached). Similarly, the Uncompahgre Field Office can and should protect lands with wilderness characteristics from the damage likely to result from energy development and uncontrolled off-road vehicle (ORV) use, both of which the BLM has acknowledged are likely to occur if these activities are permitted to occur on lands with wilderness characteristics. In addition, the information submitted regarding citizen-proposed wilderness constitutes significant new information that must be addressed in this RMP revision. This information has not yet been analyzed in the existing land use plan, so NEPA requires analysis of the potential environmental direct, indirect and cumulative effects of oil and gas development on these areas and consideration of protection for them. See, 40 C.F.R. § 1502.9(c); Marsh v. Oregon Natural Resources Council, 490 U.S. 360, 374 (1989). In a recent decision, the U.S. District for the District of Utah found that information regarding wilderness characteristics that was not considered in the existing land use plan was: a textbook example of significant new information about the affected environment (the wilderness attributes and characteristics of the Desolation Canyon, Floy Canyon, Flume Canyon, Coal Canyon, and Flat Tops unit) that would be impacted by oil and gas development; information that was not reflected in BLM's existing NEPA analyses. Southern Utah Wilderness Alliance v. Norton, 457 F. Supp. 2d 1253 (D. Utah 2D06) (attached). A compliant NEPA analysis requires not only assessment of potential impacts but also a consideration of potential mitigation measures, such as protecting lands with wilderness characteristics. 40 C.F.R. §§ 1502.14,1502.16. The Uncompahgre RMP must consider protective measures tailored specifically to protect lands with wilderness characteristics. BLM's Arizona State Office has issued guidance that elaborates upon the BLM's national guidance by providing for identification of lands with wilderness characteristics and development of management prescriptions to protect and enhance these values (1M No. AZ-2005-D07 - attached). The Proposed RMP for the Arizona Strip includes land use allocations for lands with wilderness characteristics in every alternative and sets out protective management prescriptions (Table 2.10). This RMP also includes a detailed discussion of how BLM identified and assessed wilderness characteristics and the need for protective management (Appendix 3.0). The process is consistent with FLPMA's direction that BLM inventory for the many values of the public lands and consider ways to protect them (i.e., not all uses are appropriate in all places) in the RMP. 43 U.S.C. §§ 1711, 1712. The recently-released Records of Decision for this planning area all include protection for lands with wilderness characteristics (available on-line at: http://www.blm.govlaz/stlen/info/nepa/environmentallibrary/arizonaresourcemanagement.html). Other RMPs that are being prepared in Colorado, Arizona, New Mexico and Utah include identification of lands with wilderness characteristics and include management of certain areas to maintain and enhance these values in management alternatives under consideration. For example, the Preliminary Draft Alternatives for the TriCounty RMPs (prepared by the BLM's Las Cruces, NM Field Office) also provide for protection of citizen-proposed wilderness, stating that these areas "would be managed to maintain wilderness characteristics." See, TriCounty RMPs/EIS Newsletter, p. 3 (available on-line at: http://www.nm.blm.gov/lcfoltricounty/tricounty.html). The Preliminary Goals and Objectives set out a management approach specific to lands with wilderness

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	characteristics, including: • Goal: Maintain naturalness, outstanding opportunities for solitude, and unconfined recreation. • Objectives: - Manage areas with wilderness characteristics to maintain the natural qualities of the landscape where the imprint of human activity is substantially unnoticeable; where the sights, sounds, and evidence of other people are rare or infrequent; and where visitors can be isolated, alone, or secluded from others. - Provide management direction for assessing site specific impacts from proposals that fall within identified areas with wilderness characteristics based on the long-term effect on naturalness, ability to restore the impacted area to its natural state, compatibility with VRM objectives, loss of opportunity for solitude and primitive recreation, and potential for proposed use to be accommodated outside of the area. In addition, the Draft RMP for the Little Snake Field Office (released February 9, 2007 and available online at: http://www.co.blm.gov/lsra/rmp/index.htm) addressed management of lands with wilderness characteristics and/or backcountry characteristics. Most of the lands at issue in the Little Snake Draft RMP were identified as part of a citizens' wilderness proposal, which the BLM re-inventoried and considered for management of their naturalness and/or opportunities for primitive recreation or solitude. The Draft RMP identifies two specific management approaches, one for "Lands with Wilderness Characteristics Outside Existing WSAs" and another for "Lands with Backcountry Characteristics Outside Existing WSAs." See, Draft RMP, pp. 2-158 - 2-161; 2-199 - 2-201. Management prescriptions include: Lands with Wilderness Characteristics: • Objective: "to protect naturalness, opportunities for semi-primitive recreation and solitude"; • closed to oil and gas operations and other minerals activities; • off-road vehicles (ORVs) limited to designated routes; • Class II or Class III Visual Resource Management (VRM) classification; and • Some areas may be managed as a Special Recreation Management Area (SRMA) to "provide quality primitive recreation experiences in a largely natural setting.": - closed to oil and gas leasing (or to new oil and gas leasing); - closed to ORVs; - VRM Class II. Lands with Backcountry Characteristics: • Described as "backcountry areas"; • Objective: "to provide backcountry recreation experience in predominantly natural settings"; • closed oil and gas leasing; • closed to ORVs; and • VRM Class II.
2784	To ensure that wilderness values receive proper and sufficient attention as a critical aspect of land management in preparation of the Uncompahgre RMP, BLM must address wilderness as a separate and unique issue in the planning process including in its Planning Criteria, in the Analysis of the Management Situation and in each section of the RMP. Protection of lands with wilderness character should be identified as a major issue in the scoping report. This will assist the public in understanding the values of Wilderness-quality lands and the potential effects of other multiple uses on wilderness character, as well as in communicating comments or concerns regarding the management of these lands to BLM. Because comments on protection of wilderness values will be clearly identified, BLM will be in a better position to clarify any misconceptions and provide complete responses. In preparing the revised RMP and accompanying EIS, BLM should clearly present management alternatives in the context of protecting wilderness character and analyze environmental consequences to that character. BLM has been aware of these proposed wilderness areas for some time, and the agency must attend to them. In the "Alternatives" section of the RMP, BLM must include various ways to protect these lands in each of the management alternatives. In addition to considering designation of new WSAs, BLM should propose protective management prescriptions or other protective status (including mineral withdrawals, non-motorized recreation prescriptions, ACEC designations, and prohibitions on new road construction and erection of structures such as cell towers) for these lands. The Alternatives section must also discuss the implications of each alternative for the wilderness-quality lands governed by the Uncompahgre RMP. Finally, BLM must specify the "Environmental Consequences" of the resource management decisions on the wilderness-quality lands in the planning areas. This discussion should include, but not be limited to, an analysis of the cumulative impacts of other activities (including those undertaken by non-federal entities) within the planning areas on these unique lands. In short, in every major section of the RMP, BLM must address wilderness-quality lands and citizen-proposed wilderness areas. BLM should then take appropriate actions to protect wilderness character in the preferred management alternative. We look forward to seeing inventory for and protection of wilderness qualities comprehensively addressed as the preparation of the Uncompahgre RMP proceeds. Additionally, we realize that the newly-designated Dominguez-Escalante National Conservation Area will not be included in this RMP, but we would like to reiterate that the NCA plan must fully evaluate potential wilderness lands within the NCA. The Uncompahgre RMP should address potential impacts to the adjacent NCA lands, including wilderness-quality lands. Recommendations: BLM should include protection of lands with wilderness characteristics in the RMP's management alternatives and thoroughly analyze this issue throughout the planning process. To ensure that wilderness values receive proper and sufficient attention as a critical aspect

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	of land management in preparation of the RMP, BLM must inventory for lands with wilderness characteristics (including those lands identified below as citizens' proposed wilderness), consider alternatives for protecting lands with wilderness characteristics (including for those lands currently designated as WSAs if they are not ultimately designated as Wilderness by Congress) and address wilderness character outside of WSAs as a separate and unique issue in the planning process in each section of the RMP, as described above.
2785	Specific lands to be protected We are submitting a map of citizens' wilderness proposals that should be inventoried and considered for management to protect their wilderness characteristics. These lands should be inventoried for wilderness characteristics and management alternatives for protecting the wilderness resource present on these lands should be evaluated, including the opportunities they provide for primitive recreation and otherwise experiencing solitude, naturalness and scenic beauty. The following areas have been identified as citizen-proposed wilderness. (Acreages are approximate.) We have included more detail on each of these areas with the map in Appendix 3. 1) Roubideau (Camel Back) - 20,059 Acres This maze of colorful and intricate canyons provides the obvious complement to the national forest Roubideau Area, already designated by Congress to protect its wilderness values. The downstream portion should receive the same protection from the BLM until Congress can complete the watershed's designation. 2) Adobe Badlands - 10,323 Acres This absolutely unique, sparse landscape northeast of Delta is rare in that it has not been damaged by motor travel. The area is home to an endangered species of cactus, desert reptiles, and geologic wonders. The fragile soils and striking scenery need to be preserved. 3) Sewemup Mesa - 9,253 Acres Within Uncompahgre Resource Area The majority of this CWP falls within the Grand Junction Field Office; however, nearly 10,000 acres are managed by the Uncompahgre Field Office. Sewemup Mesa is one of the most ecologically pristine areas in western Colorado, having been isolated from development and most human activity throughout history. The Colorado Division of Wildlife has identified the area as suitable habitat for Mexican spotted owl, southwest willow flycatcher, whooping crane, and the western burro owl. 4) Norwood Canyon -4,867 Acres This rugged and ecologically vibrant area in the heart of the San Miguel River corridor provides some of the better and more diverse habitat anywhere for mountain lions, hawks, eagles, and both rare and familiar native fish. This riparian area along the river has been classified as one of two most important river systems needing protection in Colorado. 5) Dolores River Canyon -17,282 Acres This heart of the stunning and wild Dolores corridor, with towering colorful sandstone cliffs, river otter, peregrine falcon, and outstanding opportunities for remote wilderness experience must gain the highest possible level of protection. We discuss this area in further detail below. Recommendations: The above areas, and any other areas that the Uncompahgre Field Office inventories and finds to possess wilderness characteristics, should be managed to protect their wilderness values. Management prescriptions for these areas should include: closed to motorized vehicles; VRM Class I; closed to all forms of energy development; ROW exclusion areas; and other protective measures.
2786	Dolores River Corridor The Dolores River Canyon Wilderness Study Area and surrounding wilderness-quality lands, with towering colorful sandstone cliffs, river otter, peregrine falcon, and outstanding opportunities for remote wilderness experiences, must gain the highest possible level of protection. The Dolores River Corridor includes the river corridor itself (river, riverbanks and immediately adjacent land alongside the river including to the canyon rims), as well as adjacent wilderness study areas and citizens' wilderness proposal areas. The RMP should commit to continuing to manage the Dolores River Canyon WSA to protect its wilderness qualities even if it is released by Congress. BLM should also manage the citizen-proposed additions to the WSA so as to protect their wilderness characteristics. Previous findings of wild and scenic suitability for the Dolores River should be reaffirmed in the RMP revision. It has been found suitable in the past and still maintains the same qualities. Few streams boast the unique natural values--and extent of threats to those values--as are found along the Dolores River. The river itself, and all its eligible tributaries, should receive immediate, thorough, and enduring protection. Oil and gas leasing should be prohibited in the Dolores River Corridor, or should at a minimum maintain No Surface Occupancy stipulations. Impacts of development within the corridor are not consistent with protection of outstandingly remarkable values or the existing Special Recreation Management Area designation. The RMP also needs to prohibit uranium mining within the river corridor. All permitted mines in the resource area must prove that there will be no harm to both surface and ground water quality and quantity; prove that the long-term ecological health of the area will not be jeopardized; have viable reclamation plans in place before permits can be granted; and have an adequate bonding mechanism in place sufficient enough to cover the entire cost of reclamation. BLM must ensure that all state and federal laws are applied to any permitted mines. The BLM must also ensure that a viable long-term plan for dealing with any radioactive or contaminated materials as well as any other waste products is securely in place. These management actions are

Table C-13
Issue 1: Special Designation Areas – Wilderness, Wilderness Study Areas, Lands with Wilderness Characteristics

Comment ID	Comment
	necessary to protect the Dolores River and the WSA. The Dolores Corridor should be managed in close cooperation with adjacent BLM Field Offices. For example, the Dolores River Canyon Wilderness Study Area is bisected by the Uncompahgre Field Office and the San Juan Field Office, but requires consistent and close management, especially considering issues with motorized incursions from the Utah state line. The Sewemup Mesa CWP expansions to the existing WSA also overlap the Grand Junction and Uncompahgre Field Offices. Significantly, the river itself crosses boundaries between the San Juan, Uncompahgre, and Grand Junction Field Offices. It is important that the river ecosystem be considered as a whole in order to institute management that maintains its unique qualities. We urge the Uncompahgre Field Office to adopt a broad vision of the landscape in approaching the cooperative management of these areas. Recommendations: The Dolores River Corridor should be managed as an entire ecosystem with the goal of protecting its outstanding natural, historical, ecological and recreational values. The Dolores River Coalition is submitting detailed scoping comments addressing this area, and we herein reference and support those comments.
1781	I used to be a backpacker and hiker, and I know that roads lead to litter and a destruction of the wilderness experience.
2258	The Dry Creek area identified in earlier plans as available for coal mining is not only in one of these areas but represents one of the few areas of aspen and oak brush, i.e. lower elevation habitats within the UFO that may be considered nearly "wilderness" in character. On terms of maintaining a "multiple use" focus in the UFO and GMUG this parcel is of prime importance to grazers and outfitters. Both of these activities would be impacted by coal mine development

Table C-14
Issue 1: Special Designation Areas - National Scenic Byways

Comment ID	Comment
1239	The BLM should fully recognize the West Elk Loop Scenic and Historic Byway as a state designated Byway that was established with the full support of five counties, several communities, two state agencies, and three federal agencies, including BLM.
1240	One of the primary concerns of the Byway is protection of the viewshed and other intrinsic resources for which the Byway was established (i.e., scenic, wildlife, historic, and cultural values).
1241	Rather than identifying modifications, the Byway requests that the area along the Byway remain relatively natural in appearance.
1242	With the exception of the mining developments between Paonia and Somerset (part of the cultural landscape), we request that a ½ mile overlay corridor be identified on the public lands along Highways 92 (east and south of Hotchkiss) and 133 (east and north of Hotchkiss) where development considers the impact to Byway resources, including the viewshed. Thus, the location of developments such as open mines, oil and gas wells, etc. should be sited whereas they are not generally visible to byway travelers. The use of topography and vegetative screening can help reduce the visual impacts.
1243	Apply an overlay zone ¼ mile on either side of the above referenced highways wherein visual and other resource impacts receive a higher level of scrutiny before development approval
1244	Notify the Byway of planning opportunities where actions might affect Byway resources/travelers.
1245	Related to industrial activities (such as oil and gas development), insert in permitting documents restrictions designed to minimize conflicts between lease-related trucking activities and Byway travelers.

Table C-15
Issue 2: Energy Development – General

Comment ID	Comment
2796	The BLM must have a proven track record of successful reclamation before considering disturbances to be "temporary." The BLM has shown interest lately in phased or rolling development, but this framework assumes that managers are able to successfully reclaim areas that have been disturbed. We consider successful reclamation to consist of a return to baseline conditions, which would mean a return to the pre-disturbance vegetative composition and structure} retention of the original soil type, and re-colonization by the animals that used an area prior to disturbance. We remain concerned that these results may be very difficult to achieve here in the arid West, where lack of precipitation and an abundance of invasive species may prevent even the best management practices or Conditions of Approval from being effective. Before the BLM adopts this approach, or even uses it to calculate acres of "temporary" versus "permanent" disturbance, it should be able to point to a proven track record of mature, successful reclamation projects demonstrating that this is possible and that the BLM has the ability (including funding) to make this an outcome with a reasonable expectation of being fulfilled. RMP revision should clearly state reclamation standards including necessary monitoring, and should define success in an ecologically sound way.
238	Development of a reasonable foreseeable development scenario for fluid minerals, uranium, and coal to aid in the environmental consequences analysis
271	Revisions which may in one way or another permanently restrict or change the available usage and access to BLM lands or mineral interests should be carefully considered.
280	The area included in the RMP boundaries contains some fantastic "wild places". In a West that continues to urbanize and develop rapidly, these places (especially those outside of the rocky mountain ridges that often fall under USFS jurisdiction) are increasingly valuable. I would like to see an end to further road construction; better designation of OHV use and non-use areas; the elimination of non-renewable energy development and careful consideration of the footprint associated with any renewable energy projects such as solar or wind installations; and continued maintenance of facilities such as the (very much appreciated) picnic/camp areas on the San Miguel.
284	I would like to see further expansion of an adaptive management paradigm that seeks to balance stakeholder input with the scientific and technical expertise of agency staff (botanists, hydrologists, archaeologists and range managers). This could include: adjusting stocking rates to buffer against projected increases in mean air temperature and evapotranspiration; restricting or eliminating non-renewable energy and mineral extraction that threatens ground and surface water with contamination; and controlling invasive species where they directly threaten native ecosystem integrity.
296	I would like to encourage decision makers to remember the importance of resource development for the well-being of the people here. Please continue to honor the objective of resource extraction.
297	None-accept to allow for road building where needed for mineral extraction.
335	Allow all drillable leases to expire and ensure public land trust(s) to remain.
352	The entire San Miguel River ACEC and the entire BLM holdings in Saltado and Specie Creek Canyons should be "No Surface Occupancy" stipulations for O&G and other energy development to protect scenic values and natural values. Given the low probability of any O&G development ever occurring there is little or no cost to such actions. Geothermal leasing should NOT be allowed in this area until very tight regulations are developed, if at all.
353	All mesa top and mesa rim O&G leasing should include No Surface Occupancy restrictions to protect scenic values. Similarly the same region should be either closed to or extremely restrictive on the sale/disposal of saleable materials.
357	The BLM should include in the RMP the exact energy potential maps and data source citations that underlie BLM maps and will be used for decision making for the RMP. If this is not possible an appendix should list all caveats, notes and specific citations for underlying data to document what was used and to avoid confusion. The following specific information should be included in the RMP to allow readers to understand what data was used for energy potential, also ALL disclaimers from underlying data should be included: 1. Source map used to create any energy potential mapping of any type or that will be relied on for leasing or mineral disposition related decisions. Example; oil and gas potential maps, geothermal potential maps, etc. 2. In appendix include accompanying .XML source data for any maps include citation, restrictions, limitations of data (e.g., Colorado Geothermal Gradient Map for CO State Geology Service, caveats like "data points are often clustered with

Table C-15
Issue 2: Energy Development – General

Comment ID	Comment
	wide areas of sparse data') See the attached example confusing map cited by BLM in David Burgess et al v. BLM.
358	Particularly for energy related data/mapping the BLM should make sure that use of such data in the RMP follows its own data quality guidelines: "2. Ensuring and Maximizing Information Quality defined BLM is issuing these guidelines to ensure and maximize the quality, including objectivity, utility and integrity, of disseminated information. Objectivity, integrity, and utility are defined here, consistent with the OMB guidelines. "Utility" refers to the usefulness of the information to the intended users. "Objectivity" focuses on whether the disseminated information is being presented in an accurate, clear, complete, and unbiased manner, and as a matter of substance, is accurate, reliable, and unbiased. "Integrity" refers to the protection of information from unauthorized access or revision, to ensure that the information is not compromised through corruption or falsification. Transparency and Reproducibility BLM recognizes that influential information should be subject to a high degree of transparency about data and methods to facilitate the reproducibility of such information by qualified third parties, to an acceptable degree of precision. It is important that analytic results have a high degree of transparency regarding (1) the source of the data used, (2) the various assumptions employed, (3) the analytic methods applied, and (4) the statistical procedures employed. It is also important that the degree of rigor with which each of these factors is presented and discussed be scaled as appropriate, and that all factors be presented and discussed. In addition, if access to data and methods cannot occur due to compelling interests such as"
384	Relative to Issue 2, as well as Issue 1, as a Quid Pro Quo for being given a lease and/or access to the public lands under the BLM's management, entities should be required to disclose at least 30 days in advance of use all chemicals contacting the soil and subsurface in their operations, including those used in fracturing in a drilled downhole, despite any alleged "trade secret" formulations. Chemicals potentially harmful to human, animal and plant life should be limited in use and, in the case of potential intrusion into the Planning Area's watershed(s) and aquifers, not be permitted at all. Such a requirement will protect the public's aquifers and watershed(s) within and possible outside the Planning Area and still not restrict access to potential energy resources. Water is obviously a limited and precious commodity in the West and preserving the quality and quantity of that available for human and animal consumption and use should be a paramount purpose of any Resource Management Plan. BLM should maintain sufficiently well trained personnel to screen chemicals intended for use to access potential energy and mineral resources and ban the use of any such potentially harmful chemicals in the Planning Area. Promptly upon request, the identity of all of the chemicals used in the Planning Area by an entity being given a lease or access to the public lands under the BLM's management related to energy and mineral resources should be provided to members of the public. Drilling and fracturing should not be permitted within 0.5 miles of a water source.
385	Upon completion of use at an extraction site, the site shall be returned to its pre-extractive condition as much as possible.
407	Mining and roads are a threat. If the Uranium mill is not built mining will never return to its former days. If it is then we need to brace ourselves for a big increase in population, lots more motorized vehicles and a lot more roads, mostly unofficial. Just look to what has happen in Mesa, Delta and the east end of Montrose counties. Our saving grace has been little increase in population. High gasoline prices have kept a lot of off road vehicles a little closer to home and away from western Montrose County.
438	I don't support drilling in these areas. I would like there to be more cooperation with. I think what is happening in Utah is a model of what not to do.
457	If there is to be any mining or drilling on BLM lands then these developers must meet all local, state, and federal requirements and activities of these operations must be continually monitored to make sure all regulations are complied with.
468	This comment is regarding how energy and mineral development, including pipelines and other infrastructure, will be managed to protect the environment and wildlife. When weighing the impacts of energy and mineral development on the environment and wildlife the impacts should be viewed as temporary. Development usually includes construction of native surface roads & pads and occasionally small structures. When Best Management Practices are followed, the impact to the environment and wildlife is minimal and after reclamation is complete the surface disturbances can result in habitat improvement (ex. clearing of dense oak brush). A clear definition of the term temporary for energy and mineral development should be defined as; use for a length of time up to 10 years. Energy and mineral development is temporary in nature because the resources in a local area will not last forever. With a defined temporary designation the unnecessary burden on BLM staff and the energy and

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Comment ID	Comment
	mineral leasees from an extended NEPA process may be avoided with the use of well defined Best Management Practices and Categorical Exclusion designations.
469	There would be no long term changes to the landscape after disturbances have been reclaimed.
470	By defining development uses as temporary and establishing a set of Best Management Practices to be incorporated into development projects you would be able to reduce the workload and permitting time required for both the BLM and Leasees of the resource.
471	Also, by looking at the long term disturbance when performing a Biologic Assessment or Opinion the assessor should be allowed to determine the outcome of the assessment based on what the effects will be in future after the sites are reclaimed. Yes, there will be initial disturbance but with adequate Best Management Practices in place, the long term impacts after reclamation are typically negligible.
472	The number of users should not be affected by energy and mineral development.
482	By defining development uses as temporary and establishing a set of Best Management Practices to be incorporated into development projects you would be able to reduce the workload and permitting time required for both the BLM and Leasees of the resource.
486	I am deeply concerned about the procedures and chemicals that are being used in methane gas extraction. The negative impacts on land, air, and water under current regulations are irresponsible and unacceptable. Before further drilling leases are issued, it is vital for us- specifically, our government- to address the well-documented damages that continue to accumulate as a result of corporate indifference and dominance.
503	Regulation of toxic drilling fluids and fluids is necessary.
528	Controls on mineral exploitation, especially pertaining to oil and gas should be rigidly enforced. There should be no possibility of aquifer contamination and sufficient bonding should be mandatory to insure adequate cleanup at the site when it is abandoned. Leases should not be granted in environmentally sensitive regions and the utmost concern should be given to nearby residents.
591	Reclamation should be required.
601	Reclamation of natural resource areas (coal, gas, oil, uranium) is important after the mining is complete. BLM revenue from mining/grazing activities should be increased if needed so that government isn't subsidizing mining/grazing activities in any way.
621	Disallowing the use of roads, grazing land, mineral and energy development, as well as recreational use, would be a poor use of public land. The point of public land is that it belongs to the people. Public lands should be available to all people. The combination of grazing lands and mineral/energy exploitation allows business and employment growth for our county, and recreational use should also be encouraged, not restricted.
639	Any un-leased lands inside municipal, or other culinary, watersheds should be withdrawn from mineral entry, or—at a minimum—placed under No Surface Occupancy stipulations. Certainly the agency must include an alternative that considers closing some lands to oil and gas development— watersheds, sensitive habitats, natural landscapes, and important recreational and community lands.
650	I also feel more land needs to be made available for the publics good, including resource exploration, powerline construction and general community uses.
692	No leasing should occur until Congress can act to remove exemptions for oil & gas.
719	Minimize physical disturbance.
728	The only issue I have is keep the public lands open to all companies that want to drill for or dif for gas, oil, coal. These resources are needed for the survival of the people of the USA.
740	Public land should be used for the good of the public. Drill holes for coal mining, gas wells, logging should be allowed. Drill sites reclaimed, trees replanted. Grazing of cattle, sheep and the hunting of wild game encouraged.
744	Unlimited commercial enterprises should reclaim sites, replant trees, repair damage. The same for large groups.
787	I am concerned about having any more leasing of Oil and gas (or development of) until there is accountability to all Fed and State environmental regulations *Clean Water Act, Clean Air Act, etc.) by the industry and the end of injection of harmful chemicals into the group for 'fracing' purposes until alternatives are explored. I request a

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	moratorium until these issues have been addressed and our communities health and environment is protected.
811	These lands have survived many years of mining, drilling exploration and recreation use. They will continue.
881	Coal, Oil and Gas Resources: I have seen how drilling rigs and buildings have been visually "hidden". By doing so a lot of people driving down I-70 never notice the drilling operations, in turn they don't think about the consequences of what's going on. I do not feel any visual considerations of disguising drilling and mining operations should be done. "Out of sight, out of mind" is not good for the public.
882	There are public lands that should be withdrawn from energy development. Any place where there is a conflict with wildlife, the safety of drinking water for wildlife and humans could be threatened, biological diversity could be threatened. Any area that could not be quickly and properly reclaimed back to its natural setting. Places that are sacred to a majority of people such as Arches, Yellowstone, Native American heritage areas, even the smallest local area that may be special to a majority of people in a community for one reason or another.
883	Always there should be conditions /monitoring of oil and gas development. Some places may require conditions different from others. Over all guidelines/regs must be in place. But each individual site should be monitored. If any extraction occurs near private property, the owners should be involved. The use of volunteers to daily monitor an extraction process could be used. I do not know of any resource conflicts with solar or wind. Unless solar panels were covering an area that someday someone wanted to drill under. Renewable energy construction would make temporary jobs, but once installed panels require very little monitoring. The wind genies require more maintenance.
884	There are lands that should be excluded from renewable energy development and extraction industries; places that are sacred, cared for, loved by a community or a nation.
891	The Uncompahgre Plateau is my backyard. It is special to me. I cherish the life I live on it everyday. I am fortunate to be completely surrounded by public lands. I want these lands to be around for my children to explore with their children, as I have with mine. I would be devastated if an extraction operation was anywhere near my home. I would notice every change in wildlife movements, erosion, weed spread, the impacts of humans on the land everyday causing a huge disturbance. A lot of stress on myself and the environment.
901	I believe it should be open to mining, logging, ranching & drilling.
915	Similarly, my irrigation water for my organic farm originates in the headwaters of the North Fork of the Gunnison where oil & gas activity is increasing. In the early 1980's an "oil slick" was observed on the water in the Paonia Reservoir. This was at a time when a gas well was active just upstream on the bank of Muddy Creek. This is precisely the scenario that needs to be avoided by whatever means necessary.
922	There should be no leasing of minerals or oil and gas in inventoried roadless areas, nor should roads be allowed to access such on existing leases.
961	Secondly, I am concerned about limiting and regulating gas and mining…..including uranium. How typical that my husband returned to his favorite hunting area last year only to find a noisy gas rig and certainly no animals. Not only do they destroy our recreational areas I am concerned about their effects on public
965	Work closer with industry on a technical, and financial level to keep resource development to the lowest ecological impact possible.
1046	Exploration and development of oil, gas, and minerals should be encouraged under an environmentally responsible plan. Permitting should be streamlined and affordable. We desperately need the revenues and jobs created by this industry.
1068	NO NEW ROADS in inventoried Roadless Areas to support energy extraction;
1905	BRC supports reasonable development of our natural resources including minerals and oil and gas. Generally, there is support among our members and supporters for development mineral resources and of oil and gas resources in the planning area. There is a high degree of confidence in BLM's ability to regulate this activity so that it is both economically feasible and environmentally sound. A significant percentage of our members live in rural areas of Utah and Colorado. The jobs associated with oil and gas development are highly valued. Indeed, many of our members make their living either directly involved in the oil and gas business, or in related "service" businesses. Oil and gas development has important social and economic benefits at the national and state level as well. These benefits are reduced or eliminated when natural gas and oil development is prohibited or severely restricted. BRC believes that oil and gas development are compatible with semi-primitive

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Comment ID	Comment
	recreational values and opportunities. We have seen where the oil and gas industry operates with little or no impacts on other resource values. There is a relatively high tolerance for oil and gas activities among those who enjoy OHV recreation. We do not support a no-lease or no-surface-occupancy stipulation for areas allocated to semi-primitive recreation.
1928	All unit agreements approved by BLM's Authorized Officer during the life of the revised plan should contain a provision requiring energy companies to adhere to federal regulations for all activities within the unit regardless of ownership of the surface property and subsurface mineral rights. Unit agreements contain language that require BLM to extend federal leases within a unitized area if an energy company drills a successful well anywhere within the unit, including on land in which both the surface property and subsurface mineral rights are privately owned. In return for the benefit of receiving an extension of federal leases based on activity on privately owned subsurface minerals, this provision should require energy companies to comply with federal regulations on all properties within a unitized area.
1966	It is important for mineral resources to be considered at an equal level with all other resource values. As such, it is necessary for these resources to be represented equitably in not only the planning criteria, but also factors which will be considered by alternative, effects to be addressed in the analysis of environmental consequences and determinations used to select a preferred alternative.
1973	The application and viability of reasonable mitigation.
1974	Limit the study to any residual effects that may be present after standard lease terms and conditions have been imposed. (For example, under the 43 CFR 3101 regulations, a two-month occupancy restriction can be imposed under standard terms and conditions of a lease for purposes of protecting critical habitat. Therefore, if the typical restriction used to protect calving areas is two months, no stipulation is needed because the BLM has the authority to restrict an operator, if necessary, to protect such areas under the standard terms of the lease. A lease notice apprising the lessee that calving grounds exist on the lease would be sufficient.)
1975	According to IM-2001-191: "When a RMP is being amended or revised, BLM will continue to process site-specific permits, sundry notices, and related authorizations on existing leases in an expeditious manner while ensuring compliance with NEPA and other laws, regulations, and policies. The BLM has the authority and discretion to condition its approval of proposed actions (APDs and other site specific activities) with reasonable measures (including relocation, redesign or delays in the proposed action) so as to reduce the effect of actions on other resource values and uses, consistent with the lease rights granted (see 43 CFR 3101.1-2). That is, BLM can use its authority and discretion to condition its approval of proposed actions to not constrain alternatives under consideration in a RMP revision or amendment consistent with the lease rights granted. Actions that may appear to reduce a lessee's right to reasonably develop a lease should be cleared through the State Director and Regional Solicitor's Office." We urge BLM to follow the requirements in the Instruction Memorandum during the planning process.
1978	We recommend that, in addition to directly contacting operators and lessees in the area for their geological input, BLM use a method that incorporates historical data on what types of impacts have typically occurred in the area. It will be impossible to determine exactly how many miles of roads will be needed or how big a specific well pad may be until an Application for Permit to Drill is filed. Therefore, the agency should use a local average for these types of uses. Furthermore, the discussion of cumulative impacts related to possible development should include not only possible impacts of oil and gas activities, but also the measures available to mitigate adverse effects. In addition, we support an approach for defining reasonably foreseeable development that addresses acceptable levels of surface disturbance rather than the number of wells in then planning area. This gives both BLM and industry needed flexibility in future development opportunities, such as drilling multiple wells from a single pad or taking into consideration wells that have been plugged and abandoned.
1981	We support BLM's statement in the scoping notice that valid existing lease rights will be honored in the new plan. Nevertheless, BLM needs to specify in the planning documents if and how valid existing lease rights could be impacted by new leasing or surface management decisions. Specifically, potential conditions of approval for operations and other changes should be identified. For example, if BLM modifies its Visual Resource Management land classifications as a result of the planning process, it is critical that the impacts on existing leasing and development be addressed. However, we recommend against modifying VRM classes in developed areas to a more restrictive classification in order to avoid potential conflicts with valid existing lease rights.
2045	Any existing or future leases should maintain non-waiveable No Surface Occupancy Stipulations.

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Comment ID	Comment
2046	Impacts of development within the corridor are not consistent with protection of outstandingly remarkable values associated with wild and scenic suitability or the existing Special Recreation Management Area Designation.
2049	It has been the practice of the BLM to apply NSO stipulations per the BLM's 1990 Dolores River Corridor Management Plan.
2115	The mesa appears to have few development conflicts likely due to access problems and little uranium potential.
2124	We are concerned about how energy development has impacted fish and wildlife in Colorado and other Western states. If pursued irresponsibly, oil and gas development can significantly reduce hunting and angling opportunities for the public. We need a responsible approach to energy development within the UFO management unit.
2128	The TRCP FWEWG has put together recommendations and priorities regarding federal management of energy development on public lands and organized them under the five areas of Funding, Accountability, Coordination, Transparency and Science. In terms of funding, appropriations for fish and wildlife management should be used to manage habitats and populations proactively. Any increase in federal funding for energy development should be matched by funding to deal with the consequences this development has on fish and wildlife populations.
2129	Regarding accountability, lands in the UFO management unit should be managed equally for multiple uses and resources, maintaining a balance of energy development and fish and wildlife habitat. For each energy field or project, a specific "conservation strategy" should be used and should go beyond the NEPA-level evaluations and plans currently being completed. These strategies should be used to proactively address the management and needs of fish and wildlife populations before development starts and must provide specific recommendations and actions to minimize impacts, establish plans for mitigation, use detailed monitoring and utilize adaptive management strategies. Managers and others must be held accountable for following all applicable laws, regulations and policies including processes included in the National Environmental Policy Act (NEPA). A process for accountability should be built into the UFO RMP that allows for the public tracking of the BLM's compliance with these laws, regulations and policies. All mineral leasing in the UFO management unit should be done in a manner that explicitly takes into account the future impacts from development on fish and wildlife resources before leasing occurs.
2130	In terms of coordination, the UFO should continue, and work to improve, coordination with all interested parties when planning and implementing energy development. Public involvement from all stakeholders, including local and state governments, Resource Advisory Councils, non-governmental organizations, industry, sportsmen and others is vitally important and should be assured by addressing it in the UFO RMP. Adaptive management based on the best available monitoring information, and coordination with the CODOW and USFWS, must be used to ensure continuity and mutual agreement which will help to lessen or avoid the impacts of energy development on fish and wildlife. The UFO should work with the USFWS and CO DOW to coordinate the efforts of The Hunting Heritage Action Plan being developed by the Wildlife Management Institute and the Association of Fish and Wildlife Agencies. An effective adaptive management process should also include regular reviews of both state and federal findings from research and monitoring, active consideration of alternative energy field management and the means for making such management changes for future development where needed to lessen impacts on fish and wildlife. A lack of coordination and data-sharing often means that the same approach to development is continued despite monitoring that has shown it is detrimental to wildlife.
2131	In regard to transparency, the development of the UFO RMP, and the decision-making process involved in energy development on lands administered by the UFO, should be clear and transparent and follow administrative law and policy. The UFO RMP should incorporate extensive public input throughout the process and use the most up-to-date information and strategies available. Decisions made by BLM officials and the processes leading to them must be transparent and should follow the most current laws, policies and procedures at all times. This includes opening all cooperator meetings held by the UFO and others to the public for participation in these key conversations. Sufficient information about proposed leases and development must be provided to the public to allow for understanding and reasonable comments, and the time provided for public comments should be commensurate with the complexity of the proposals. All meetings related to energy development in the UFO management unit should be part of the public record
2132	In terms of the science aspects of the FACTS principles, the best scientific information must be used to inform the UFO on all management decisions, particularly when specific research has been conducted on the impacts of

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	energy development on fish and wildlife (see below for a list of research and guidelines relevant to the UFO management unit). Subsequently, adaptive management processes should be used and based upon monitoring data so that a systematic approach to adjusting development can be made when other natural resources are affected. The energy development planning process should include science-based mitigation. This mitigation must be planned by using rigorous methods and an adaptive management process as described above. Offsite mitigation is essential when on-site mitigation cannot be effectively used or is not appropriate to offset resource values impacted at the project location. Certain special and unique places in the UFO management unit should be recognized in the RMP based on their high value fish and wildlife resources, special habitats and/or ability to sustain sensitive species. The best available science and data should be used to help recognize these places and these places should be entirely off-limits, or extremely limited, to any development.
2135	Oil, gas and mineral extraction projects within the UFO management unit must balance the multiple-use sustained yield mandate in the FLPMA with the development of extractable resources
2138	The UFO should consider geographically-phased energy development prior to the leasing stage to responsibly balance the needs of fish and wildlife with oil, gas and mineral extraction. Large geographic areas to be offered for development should first be subdivided into smaller units– each with the necessary crucial habitat and migration corridors to maintain fish and wildlife populations and the ecological processes of the area. The subdivided units should be developed fully and completely restored (with respect to fish and wildlife habitat) one at a time before subsequent subdivided units are developed. This will help to minimize the impacts on wildlife that may be displaced from the developed unit. When the wildlife habitat on the larger, fully-developed unit is restored, the next unit can be made available for development. In this way, smaller units are developed and restored over a longer period of time, not in the current mode of field development that is too fast and leaves large areas of land unusable for wildlife. Geographically-phased development can occur on multiple scales including landscape, field or single leased parcel. Species of interest to hunters that could be helped particularly by geographical phasing are mule deer, pronghorn antelope, elk, bighorn sheep and sage grouse. For geographical phasing to be effective in reducing adverse impacts on wildlife populations, the species-specific life-stage habitat requirements must be known for the impact area so that all life-stage requirements are provided for, even in the face of unit subdivision and development. Baseline conditions and future objectives also should be known before development proceeds. Migration routes providing wildlife with access to seasonally-required habitat must remain intact and functional at a level acceptable to sustain populations. The area to be developed should be determined for each geographic area based on the species present and an assessment of overall habitat conditions in a larger, surrounding area, including what is needed to sustain the populations on a large scale.
2149	TU suggests that the UFO incorporate the latest management strategies for topsoil salvage in energy development areas.
2150	Additionally, the current Oil and Gas Plan for this resource area (October 1991. Record of Decision. Oil and Gas Plan Amendment to the San Juan/San Miguel Resource Management Plan Environmental Impact Statement (EIS) is outdated and should be amended to reflect the significant changes that have occurred with respect to energy development and resource management.
2154	As previously urged, we again request an updated Oil and Gas 'plan. Additionally. the use of hydraulic tracking in energy development has significant impacts to water quality. The RMP should contain updated and appropriate management language that incorporates the state of Colorado's oil and gas conservation rules and any new federal guidelines that dictate management prescriptions.
2176	The Preparation Plan also asks "Do constraints identified for new leases also apply to areas currently under lease?" This question needs to be divided into constraints in the form of conditions of approval and constraints in the form of stipulations. Existing leases would not be subject to new stipulations; however, existing leases would he Subject to "reasonable conditions of approval. Constraints in the form of stipulations that are developed as part of a new leasing decision should apply to all new leases considered for sale in the UFO. The RMP, as part of a new .leasing decision, should also make it clear that the same constraints applied to new leases, will be applied to existing leases in the form of conditions of approval unless the authorized officer determines that such as constraint would not be "reasonable" under 43 C.F.R. § 3101.1-2. In doing so, the UFO will ensure that old leases in the FO will be subject to the most current resource information and protections, while still recognizing the rights of lessees.
2177	The Preparation Plan also asks "For each lease stipulation, what are the circumstances for granting an exception,

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	waiver, or modification? What are the general documentation requirements and public notification associated with granting exceptions, waivers, or modifications?" Any lease waiver, exemption, or modification should be subject to an environmental assessment and public comment.
2178	On page 16 of the Preparation Plan questions are asked: "What are the pertinent issues surrounding split-estate lands and impacts to surface owners? What can be done to resolve these issues in the RMP?" The most critical issue surrounding split estate lands is how to balance private property rights of the land owner with rights of the lessee. For new leases, the UFO should consider an approach that recognizes that landowners should have a say how development occurs on their lands by implementing a CSU stipulation requiring that the surface landowner agree to a surface use plan of operations before an application to drill is approved. If this stipulation was included in all leases, it would be a condition of the leases and as such the rights of the lessee to explore for and extract oil and gas would be encumbered by it. This would level the playing field for the landowner and the lessee and help to ensure that the ELM is able to lease federal minerals while being a good split estate neighbor.
2185	We urge the UFO to control and strictly limit gas production, mining, motorized recreation, and other uses that threaten the long-term health of natural ecosystems
2331	Unroaded areas are needed where wildlife and wild rivers can thrive unimpeded by noisy, dust-creating off-road vehicles or energy development.
2349	This is my backyard, and I know and love this part of the world. I realize that some energy development is necessary, but when all the resources have been sucked dry, it is essential that this area will have retained it ecological integrity and its wild and remote beauty.
2351	BLM should designate zones for renewable energy development in the RMP, and limit renewable energy projects to those zones. Any oil and gas development allowed under the RMP should be carefully constrained, subject to phased development that minimizes damage to unique natural features, essential wildlife habitat, and other sensitive areas. The RMP should impose strict limits on uranium and other mining to protect our land, air and water these extractive industries have not worked the lands which they were previously awarded and now they want to grab more permits. what is their agenda?
2372	"Management" so often amounts to an excuse for development, whereas this area would be best served if it remained entirely free of human interference, including off-road vehicles, energy development, and especially mining, which is always very nasty
2384	There is enough land in the West which has been used for oil and gas development and that allows ORV use.
2395	Most BLM land is open to vehicles, off-road sports and oil, gas, grazing, mining and other tear-the- land-up uses. In this Plan revision I ask for as much land to be set aside as roadless as possible. As time marches on this will become the most valuable part of the area.
2402	I recently watched a TV documentary on the "fracking" method of extracting gas and oil in Colorado and other states that is highly hazardous to the health of residents due to the resulting water supply contamination. The devaluation of homes and property in the affected areas was devastating, but the worst ramification was the severe, chronic and irreversible health issues suffered by humans and animals. PLEASE do not allow unrestricted mining!
2419	Those lands, as well as potential wild and scenic river corridors, should be closed to all forms of energy development and transmission.
2492	All you have to do is drive west on the interstates to the north (towards the Utah border) to see what development has done - the lights and noises of the natural gas / oil rigs rip through the night like cannons. ENOUGH ALREADY!!! Leave something for our children's children's children.
2526	Energy development is great in the correct setting, not destroying wonderful natural feature and wildlife habitat.
2533	Development and wrong use has wrecked so many places we must now protect them strongly, with roadless rules in place, and resource 'development' stopped before it starts. Stop the threat of devastation of the Uncompahgre Plateau and the surrounding habitats.
2537	We can achieve Energy Independence without sacrificing America's Pristine Wilderness!
2579	Meeting our energy needs is important, preserving and maintaining our environment is crucial. Every effort must

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	be made to keep our lands as clean and habitable as possible. There are no other options.
2602	We can find other forms of energy rather than mine this area, we can recreate on motorized vehicles in allowed areas, but we simply cannot replace the Uncompahgre Plateau.
2647	IT'S PRETTY DAMN SIMPLE: KEEP THE ENERGY INDUSTRY OUT OF THE WILD PLACES YOU CONTROL.
2690	While there are alternatives to uranium, oil and gas, there is no alternative to the Uncompahgre Plateau. Once it's damaged or destroyed, it's ruined or gone. It cannot be restored or replaced.
2693	Let's get real. Development of this area will only temporarily enrich the CEOs of uranium, oil and gas companies. Is that worth sacrificing the priceless and irreplaceable resource that is the Uncompahgre Plateau? Of course it isn't.
2704	I encourage BLM to emphasize resource protection in this RMP. This area is unique and should be protected forever as wilderness with no motorized intrusion or any mineral development including both mining and oil & gas. Also there should be no pipelines or transmission lines crossing the area.
2748	Do we really need the energy that destroys the land?
2837	Energy Corridors As part of the process to designate West-wide Energy Corridors mandated by the Energy Policy Act of 2005, the Department of Energy's Final Programmatic Environmental Impact Statement (PEIS) designates several energy corridors for pipelines and powerlines through the Uncompahgre Field Office. Especially of note is corridor 130-131 (5), which intersects the northern edge of our Norwood Canyon CWP. This corridor could 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; • lack 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 opportunities. Many of these concerns were largely ignored in the formulation of the Final PEIS. During the RMP revision, BLM should evaluate potential impacts from corridor 130-131 as well as other corridors within the field office to determine if these corridors are found to be compatible with appropriate resource management. 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.
2764	Development of such lands should be held to an absolute minimum if at all, especially where such development is of the destructive nature as oil and gas exploration and development, uranium mining, and off-road vehicle use.

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2793	BLM must manage oil and gas development in a way that retains special status species and moves them toward recovery. As we have noted in our citations of FLPMA and the BLM Manual above, the BLM has a mandate to conserve imperiled species. The agency cannot prioritize oil and gas drilling or recreation at the expense of meeting its duties toward special status species. This includes all aspects of oil and gas development and off-road vehicle use - the BLM must ensure that its authorized activities do not 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 (all phases, including leasing, exploration, infrastructure construction, drilling, and reclamation) 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.
74	I am extremely concerned about the negative health impacts from oil and gas production.
75	I do not want the BLM to lease any more land for oil and gas development or issue permits to drill in the Delta City region until: all exemptions to environmental laws currently provided to the natural gas industry are eliminated.
80	The oil and gas development as it exits today in Colorado is socially irresponsible and must be stopped until responsible behavior practices can be assured.
81	I do not want the BLM to lease any more land for oil and gas development or issue permits to drill in the Delta City region until: Injecting toxic, hazardous, or carcinogenic fluids into the ground is prohibited by state and federal law.
82	ERDA, a Colorado firm dedicated to aiding the mineral exploration business with finding new mineral deposits and the valuation of existing mineral rights for the purpose of proving or disproving existing resources, has deep concerns regarding its historic access to mineralized lands on the Uncompahgre Plateau. I personally own acreage at 56320 Holly Road, Olathe, Colorado, from which I launch personalized exploration investigations for coal, oil and gas, uranium, and base and precious metals utilizing jeeps, ATV's and other small wheel based vehicles. We take care to use existing traveled paths so as to minimally disturb any natural resources, but we do need continuing access to these lands via vehicle in order to minimize timely access and transport heavy, single bodied exploration equipment such as surveying tools, gravimeters, magnetometers, etc. Both forest service and BLM lands are accessed from my existing access. Please do not effectuate any management plans or operations which would minimize my existing access to these lands via small wheel based four-wheel drive vehicles, or the use of commonly utilized exploration equipment and techniques.
83	The mineral deposits located under the Uncompahgre Plateau are of vital interest, concern, employment opportunity, and tax-base of the United States, State of Colorado, Montrose County, and surroundings.
85	Gunnison Energy Corporation ('GEC') appreciates the opportunity to comment to Uncompahgre Field Office on the proposed Resource Management Plan. GEC has been involved in natural gas exploration in the northern portions of the Uncompahgre Resource Area since 2000. We hold numerous federal as well as fee oil and gas leases in the southern end of the Piceance Basin and we are actively exploring for and producing natural gas from these same leases. The Piceance Basin extends from the North Fork Valley northward into Wyoming and has been an active and very productive oil and gas producing source, especially along the 1-70 corridor. The southern end of the basin has been explored as far back as the 1950's. Only now has the technology and to some extent the infrastructure become available to fully explore and determine the real potential of the southern end of the Basin. We believe the North Fork Valley has very high potential to contribute to not only Colorado's energy requirements but to the nation as a whole. We, therefore, encourage the BLM to work with the State of Colorado, local governments and the oil and gas industry to make the natural resources available the nation needs so badly.
86	GEC and other natural gas exploration companies have invested millions of dollars of capital to obtain the rights to explore and hopefully develop resources. Coal mining companies in the North Fork Valley have done the same. Both extractive industries are key to the future of economic development in the area. BLM must take this into consideration when re-writing the Plan.
87	Radical changes in the direction of the Plan [Resource Management Plan] would potentially upset years of planning and millions of dollars of investment from all the various industries present in the Valley.

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88	Plan changes specifically changes in lease stipulations, should be made carefully so they do not adversely affect existing lease stipulations whether on BLM, US Forest or split estate. Stipulations as finalized in the 1991 Oil and Gas leasing Amendment should be left as they currently are. Oil and gas exploration is not an overnight event. Serious long term planning is required to evaluate and produce oil and gas no matter where the operations occur. This requires years of planning which includes designing operations for existing stipulations that are in place during the planning phase. Changes in any stipulations can be very disruptive, cost millions of dollars and consume years. Therefore, GEC recommends the BLM take a very cautious look at any stipulation changes from the 1991 document.
89	Access is key to an oil and gas operation. Planning for operations includes determining what existing access is available and designing along the access to reduce surface disturbance, reduce habitat fragmentation and cost of construction. GEC discourages the closure of public roads and rights of way. Thousands of acres of valid existing oil and gas leases exist and can only be reached by existing access at this time. BLM must closely evaluate any changes to access roads to avoid conflicts with developing these valid rights.
92	The RMP process must update the Reasonable Foreseeable Development Scenario for the Recourse Area. New exploration and development technology has begun to prove up reserves of natural gas through out the Rocky Mountain States. The scenarios of 1991 are severely under stated.
107	Coal mining is and has been a major source of employment and has been a significant part of the multiple-use of the Federal lands in the North Fork Valley for over 100 yrs.
108	As current minable reserves begin to reach their economic and safe mining limits in the next 10 to 20 years, it will be necessary to explore and open new areas along the Grand Mesa.
109	Many of the areas identified by the BLM as containing potential coal mining resources have been previously identified by the USGS (Hettinger, et al., 2000 and 2004). Many of the areas identified as containing coal resources are also located under lands managed by the USFS. According to the Colorado Historical Society, some 300 coal mines once operated in the North Fork Valley. Many of these small, historic underground "wagon" mines supplied coal for local homes, communities and ranchers. Coal, while not looked upon kindly by the Obama Administration, is and will continue to play a major role in powering this country as it attempts to transition to other forms of energy over the next 50 to 100 yrs. Because of this, the resource management plan should continue to consider coal as a major participant in the multiple-use planning of this resource management area and all areas previously considered as containing mineable coal resources (including USFS managed lands) should continue to be included in the revised RMP.
111	Changes to the management plan should be considered carefully, specifically changes in lease stipulations on BLM, Forest Service, or Split Estate. Changes to the Stipulations can have major adverse impacts to the costs and long term planning of a coal operation, and changes should be analyzed for long-term effects on recovery and use of these resources in the Uncompahgre Resource Area.
114	In particular, the RMP could simply acknowledge that the identified potential coal resource areas located on the south flank of the Grand Mesa will also need access ROW'S.
116	In the development of the RMP for the Uncompahgre Resource Area, we would like the BLM to consider the capital investment SG and other energy development companies have made in the legal purchase of federal and private mineral interests under the assumption that we would be able to develop these resources. If we had believed that there would be a restriction or change in policy that curtailed this development, we would have likely considered other alternatives. Changing of policy at this time Would be unfair, arbitrary, and would have significant impacts on energy companies, local businesses and their families.
118	We would like the BLM to consider the environmental benefit of developing national energy resources, which are done under the highest environmental scrutiny and highest standards in the world, as opposed to the development of energy resources in other countries which do not have our standards of environmental protection and stewardship. Global impacts of energy development are extremely complex and nuanced, and natural gas is still considered one of the most abundant, environmentally benign and attainable resources. We contend that development of energy resources here in the U.S. will have less of a global impact compared to the environmental costs of development in other countries, and the subsequent transportation of those resources to the U.S. and we would like the BLM to consider this in their Environmental Impact Statement for the RMP.

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119	We would like the BLM to consider SG's and our partner, Gunnison Energy Corporation's contributions to local projects designed to enhance and improve habitat for big game on our public lands, which have not only benefited wildlife, but also benefited the public land users that enjoy wildlife for hunting opportunities, but also for non-consumptive uses. These habitat improvement projects have been completed, or are near completion at this time, and show how local energy companies are committed to on-the-ground benefits and can cooperate with local land management agencies and land owners.
120	We would like the BLM to consider how we are required to follow and/or obtain permits from the following related to mitigating environmental impacts of oil and' gas exploration and development: BLM's Onshore Orders, Gold Book Standards and Guidelines and Best Management Practices; CDOW's Standards for Oil and Gas Operations; Gunnison County's Temporary Regulations for Oil and Gas Operations; sections 401 and 404 of the Clean Water Act; the Clean Air Act; Colorado Oil and Gas Conservation Commissions' Rules, Orders and Permit stipulations; Colorado Department of Public Health and Environment Air Quality Control Division permits; CDPHE Water Quality Control division for stormwater permits; NPDES Temporary Discharge Permit and Minimal Industry Discharge Permit; Department of Transportation's Office of Pipeline Safety; National Historic Preservation Act; Endangered Species Act; and full disclosure under NEPA along with any conditions of approval, terms and conditions, or project design criteria desired by these regulatory and permitting bodies, not to mention the adherence to the Code of Federal Regulations enforced by the BLM, USFS, US Army Corps of Engineers, Environmental Protection Agency and US Fish and Wildlife Service.
122	We have witnessed many occasions where opponents of natural gas exploration and development have claimed that we are not required to follow any environmental regulation and that development of federal minerals will therefore have undue environmental impacts because our industry is unregulated. We humbly and strongly contend otherwise.
145	There is a lot of private land on Oak Mesa but the mineral rights are federally owned. It has been shown in other places in western Colorado where drilling has been done, that the drillers have treated land owners in a very cavalier manner. No regard for their property or their persons. We hope this will not happen on Oak Mesa.
146	We would expect the Bureau of Land Management to have diligent oversight on all operations conducted on Oak Mesa. -- Settling ponds for toxic waste water, water procurement. Road construction and road use on private property.
147	With a heavy heart, I envision Oak Mesa being destroyed as other places have been by the gas drilling.
208	This letter is to advise you that I am totally in favor of gas and oil wel1s in Delta County as long as they are supervised and managed in a reasonable manner. I have recently been contacted by Citizens For A Healthy Community asking that I write to you about my feelings on this issue. So I am complying with their request.
210	BLM planning must balance a lot of conflicting wants. But BLM needs to preserve access to minerals, coal, oil and gas, uranium and sand and gravel. These minerals are used to provide needs to the nation, jobs to residents tax revenue to governments. Land removed from development reduces all of the above.
213	The Issue: The BLM needs to stiffen its criteria for deciding whether a natural gas operator has successfully drilled a test well on soon to be expiring lease acreage which exhibits "potential production" if hooked up to a gathering line. If the operator succeeds in passing that test, the BLM will categorize the acreage as "held by production" and will not allow it to expire. The Problem: As far as we know, there is no adequate economic dimension to this test. A well must be economically productive when tested to be a valid indicator of whether the well would ever be actually hooked up to a pipeline, and therefore allow the acreage to be meaningfully "held by production." This question has serious bite today: A wellhead test volume that was economic two years ago when gas sold for $13/Mcf is meaningless today when gas is going for $5/Mcf. The Answer: So the BLM must hire in-house personnel qualified of judging whether a given wellhead test volume is meaningfully economic at prevailing gas prices, including the dimension of how quickly the well's initial output would decline. Or at least outsource that task to qualified consultants. The Danger from rampant attempts to prove acreage: Otherwise, opportunistic operators will start to drill great numbers of wells--on leases that are either close to expiration or even where that is far off--to hold acreage because they know they will have an irrelevant, easy test to pass. They will do that now because drilling costs are very low--the flip side of low sales prices for the product. They will not have to run the risk of putting the gas on production and wasting it by selling into a cheap market because they have no need to do that. All they need to do is to hold acreage for the future--five,

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Comment ID	Comment
	ten years or more down the road-- when hopefully gas prices will be higher.
214	The tragedy for forest users and wildlife is that in this case national forest and wild and scenic BLM land will start to be littered with roads and pads for wells the leaseholder does not intend to use because, realizing the production won't be economic for the foreseeable future, he only wants to hold the leases from expiring. Examples: The two Petrox Resources APDs on the Springhouse Park IRA in the Gunnison NF, and the Gunnison Energy proposal for a well on BLM lands on Oak Mesa near Paonia. The operators would have hesitated to ask to drill those wells if they knew they would have to show enough production to make the well(s) economic at prevailing low prices.
328	I don't have anything against responsible extraction and use of natural gas, but the methods used recently throughout the state by the gas industry have been damaging to our natural resources. It is clear when one travels the I-70 corridor that the oil and gas industry have ruined the landscape in that area for centuries to come. It is even more clear when you look at the area from an airplane.
329	Use of hydraulic fracturing is ruining one of our most precious resources: fresh water. It is clear that, in pursuit of their short term profits, the industry is ruining our water tables IN PERPETUITY! Once these water resources are ruined, there is no hope of repairing them. The industry wont even say what they are using for hydraulic fracturing fluids, that should raise a red flag to any reasonable person. What will future generations think of our stewardship of this precious resource when they have to distill their water in order to use it safely?
330	Roads, drill pads, and all of the other construction in otherwise natural areas of the state destroy the pristine nature of these areas for centuries for all Coloradoans. The profits gained from the extraction of the natural gas benefit a relatively small number of people, and even those profits, along with the tax revenues that they generate, won't last for long.
331	In the rush to drill for gas, the industry is running roughshod over the interests of property owners, and is ruining their property.
332	Our unspoiled natural areas are this state's most precious resource. The short-term increase in tax revenues is no excuse, in my opinion, for continuation of policies that are ruinous to our natural resources and the beauty of our state.
334	Please, please, please ensure the viability of agriculture and clean water by not allowing oil and gas development drilling.
502	There is no need to lease more oil and gas areas- so much has been leased that hasn't been developed.
661	Coal, Oil and Gas: I would strongly recommend effective regulations for wildfire prevention and protection for drill sites and gas prep buildings in the Oak Mesa and Leroux Creek areas. Leroux Creek is the watershed source for the Town of Hotchkiss, and is a critical infrastructure asset.
664	Town of Norwood/Norwood Water Commission urges the BLM to respect the Town of Norwood's Source Water Protection Area by not approving Gas and Oil leases within the boundary.
670	We believe that BLM should require all oil and gas development to use the best available control technology to minimize Volatile Organic Carbon (VOC) production and require drilling equipment that maximizes the number of wells per pad.
671	All development should be required to develop Comprehensive Development Plans that minimize soil disturbance and disturbance for infrastructure development.
672	In addition, the demand created for and availability of water, as well as water quality impacts should be considered in BLM's planning.
673	An enforceable plan that restores vegetation in impacted areas to pre-disturbance conditions and prevents spread of exotic plant species should be required.
674	BLM must create a bonding mechanism to provide for adequate enforcement and develop policy and staffing to ensure compliance.
675	In light of recent disclosures on the nature and volume of chemical chemicals used in oil and gas development, BLM needs to monitor the use of and consider the effects of these chemicals on the surface and sub-surface environment.

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676	The policy of allowing residual well development and production wastes to be disposed of on public lands should be revisited. BLM should require these wastes to be removed from public lands and disposed of in a proper facility consistent with the character of the wastes.
694	I oppose any further drilling without tightening up the regulations for safety and adverse environmental impacts in connection with further drilling for oil and gas in our area. In particular, I mention the recent action by the EPA to re-examine the negative impacts of hydro-fracking after the study by the City of New York showing the adverse impacts. I would urge the BLM to restudy the problem, as well, in the light of the of the New York Study. That study was directed in particular to impacts on the NYC watershed of gas drilling in the Marcellus Shale. Please refer to the article published in the March 26,2010 issue of Yale Environment at page 360. The conclusions of the study are applicable anywhere else.
695	I also direct your attention to the studies by Theo Colburn, PhD. on dangerous effects of the fracking chemicals on animal bio-systems, namely endocrine disruption.
696	The BLM needs to suspend approval of drilling until it has made a further study in light of this new information.
718	That irresponsible drilling does not happen similar to Garfield County.
720	Encourage use of directional drilling to minimize surface disturbance.
723	Keeping this environment clean and safe water and air. The north fork valley is the largest concentration of organic growing in Colorado. Oil and gas production will cause growers to lose their "organic" standard. Then it's just another industrial region.
724	After attending the wserc gas symposium on 3/20, we were led to believe that all is safe with 8000' wells. Please look at this article, if you haven't already done so. "...examination of the methane problem in western Colorado is offering a strong scientific repudiation of that argument. Released in December by Garfield County, one of the most intensely drilled areas in the nation, the report concludes that gas drilling has degraded water in dozens of water wells (PDF). The three-year study used sophisticated scientific techniques to match methane from water to the same rock layer where gas companies are drilling -- a mile and a half underground" http://www.propublica.org/feature/officials-in-three-states-pin-water-woes-on-gas-drilling-426
725	In populated areas and agricultural areas, particularly here in the North Fork valley with it's high number of organic food growers, contamination of the water WILL cause irreversible consequences. With many places to extract natural gas - away from population and agricultural areas - why take the chance of damaging environmental, property, and human health?
748	To live in a valley like the North Fork Valley that is pristine and could potentially grow healthy and nutritious food for the bigger part of Colorado is a privilege. It should be the biggest priority to protect it, especially its watershed. It is a lack of responsibility to lease any land close to or above the watershed of this valley to the gas industry.
749	Think about the risk and how any contaminations or accidents can impact the whole community. The evidence of Garfield County shows that there is now guarantee. Once the damage is done, not even money could make it reversible.
750	My concerns are about leasing and developing BLM land to gas and oil companies, which then contaminate watershed, air and land of the North Fork Valley, the biggest organic growing area in Colorado. Once it is contaminated, it is to late to reverse the impact issues about food and populations.
751	In order to keep the valley clean, no oil and gas industry.
825	Existing gas and oil exploration, drilling, and extraction have had inadequate government regulation and supervision to protect surrounding landowners and to protect existing resources.
826	Current federal, state and local regulations are inadequate
827	Baseline environmental monitoring and research prior to exploration, drilling and extraction are inadequate or non-existent.
828	Adequate comprehensive baseline studies of existing water, soil and air quality in proposed and existing lease areas must be completed prior to any activities related to resource extraction. Physical changes to the landscape necessary for the completion of baseline studies may be needed.
829	Scientific peer reviewed baseline studies must be completed prior to new leasing and prior to allowing resource

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	extraction activities on public lands. The required monitoring of water, soil and air quality must continue throughout the exploration, extraction and reclamation process.
830	The cost of the baseline studies and monitoring must be the responsibility of the lease holders - but must be conducted by the independent regulators. Baseline studies must be the basis of determining the level of resource extraction activities. Ongoing monitoring of such activities must be used to make modifications (as needed to allowed extraction activity, including suspension of such activities if necessary.
831	Fracing chemicals must be regulated more strictly by governmental agencies. A) All chemical ingredients in MSDS^15 must be included - Proprietary claims for secrecy cannot be allowed because this information has to be available to properly assess risks and to conduct adequate monitoring. B) Proper storage and handling of fracing fluids is required.
832	Water used and produced during the fracing process must be tested and continuously monitored. Proper disposal/purification must be required.
835	Oil and gas drilling effects on that quality.
1008	My primary concerns revolve around the pollution of our rain and water by methane ("natural") gas drilling operations.
1010	First of all ask: is it necessary to physical change the landscape; for who's benefit - and why. Why make it easier for nearly unregulated industry to abuse our lands.
1011	The oil and gas industry (in my opinion) presents the greatest danger to the health of our environment and community and yet have used legislation to manipulate the regulations.
1012	Regulate those porters who may be bringing in tankerfulls of fracking fluids to inject who may pollute surface and ground water through drilling, who pollute the air with gases which are only visible with infra-red (benzine, etc. (I could go on and on and on)
1013	Stand up for what is right, stand up for future generations, take a precautionary approach (an ounce of prevention is worth a pound of cure) Protect the land, air, water from the potential destruction by huge multinational methane gas companies.
1070	NO FRACKING for gas extraction without a complete inventory of the chemicals used, and complete liability for water contamination.
1076	It is imperative that the BLM recognize the seriousness of decisions made in leasing mineral rights to gas, oil, and mining industries.
1077	How many seeps are ENOUGH? Does the BLM think that poisoning our water, our air, and our land is acceptable? You will note in the enclosed information that "Fracking" which is done in about 90% of gas wells across the country finds extremely reputable geologists saying that there is almost no research on fracking, and it is an emerging PROBLEM. Additionally, a leading expert has seen methane seep underground for more than seven miles, and to quote him, "There is no such thing as impossible in terms of migration." Given this information which I'm sure is contrary to what the industry wants people to believe, I do not see how the BLM can manage the lands OF THE PEOPLE-in their best interests-and allow the gas industry to inject at least 278 chemicals into the Earth as well as pollute the air with ground ozone, benzene, and other noxious chemicals. The vast majority of these chemicals cause harm to the health of humans and other living things. The ramifications here are so much greater than the boundaries of BLM land. Polluted water and poisonous air do not stop at anyone's boundaries.
1079	I know that the oil and gas industry is very powerful and can control and manipulate information. It is also evident that they seem to have little understanding of the ramifications of this all-out assault on the planet and all that inhabit it. It has become quite clear that water is made toxic, air quality is drastically affected, and land is polluted by the processes used in the production of natural gas. Your agency stands at a crossroads in decision making for a future for humans on this planet. If that sounds fanatical to you, please ask yourself what poisoning one's Home sounds like. To me Poisoning one's Home is certainly one definition of Insanity. If status quo or people higher up the ladder stop you from doing what is right, I implore you to use your common sense to change minds and policies. Our future depends on your just work.
1080	I believe the BLM should state unequivocally in the revised RMP that it is fully committed to managing publicly owned lands in a way that ensures both the health of the land and the people who live on and around those

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	lands. I believe the only way to do that is to have a moratorium on all natural gas leasing and permitting until the plan revision is completed. It is my understanding that leasing and permitting of natural gas development must be done with an environmental review and public input as called for under the National Environmental Policy Act. So until such environmental reviews show that there is no possibility of contamination of our water, land, or air; i.e. that toxic chemicals are not injected into our Earth, that future generations will not be left with a dying planet, I maintain that all areas your office now has open to future leasing should be closed to gas, oil, and mining exploitation.
1081	In regard to the revised RMP, I believe it must not allow further natural gas leasing and permitting unless and until: • Once again, that there can be a way to ensure that no domestic, irrigation, surface, or ground water will become contaminated as a result of natural gas leasing, permitting, or unitization decisions. • Air quality will not be degraded as a result of natural gas leasing, permitting, or unitization decisions. • Private property rights can be protected by prohibiting oil and gas development on private land within a unitized area without the written permission of the surface property owner. • All natural gas leases and permits protect wildlife habitat from fragmentation
1088	Further, the BLM should not expend unnecessary resources attempting to analyze the potential impacts of oil and gas development on a site specific basis. Individual development projects will be analyzed on a case-by-case basis if and when operations are actually proposed.
1102	I personally understand the economic needs of milling and mining, but am working hard to develop other possibilities for the West End of Montrose County. I for one, do not wish to see forests of oil rigs and hope that consideration will be made in the permitting process to avoid degradation of the scenic beauty of the area.
1108	Also, please allow oil & gas & uranium exploration and extraction to proceed with reasonable environment controls.
1127	Based on the general information available for review, our initial areas of concern for this upcoming resource management plan include impacts to air quality from energy development, impacts to wetlands, and protection of water resources. We are also concerned with the potential cumulative effects of the increased energy development in the region. Along with identifying direct impacts, the EIS should include a rigorous analysis of indirect and cumulative impacts. The EIS should disclose the impacts of all reasonably foreseeable actions on environmental resources in a way for decision-makers and any participating counties/municipalities to be able to effectively plan to reduce impacts on such resources as much as possible.
1200	The 1989 Uncompahgre Basin RMP assigned both the Fairview and Needle Rock ACECs to leasing with a no surface occupancy stipulation. CNAP recommends continuing to keep these areas closed to surface occupancy. We have not thoroughly researched the sub-surface rights in these areas, but due to the sensitive nature of the rare plants and aesthetic features that occur on Fairview and Needle Rock ACECs, respectively, we encourage the BLM to consider closing these areas to oil and gas leasing to provide even greater protection for the irreplaceable features which occur there.
1201	In a broader scope, 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) that may be considered in the revision of the RMP. 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 future oil and gas lease stipulations; for example that currently occur in Appendix A of the Uncompahgre Basin RMP, under 'Threatened, Endangered and Candidate Plant Areas. 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.
1299	I attended the very informative symposium on natural gas development sponsored by Western Slope Environmental Resource Council on March 20, 2010, in Hotchkiss. While the industry representatives made an effort to minimize the risk, it is irrefutable that accidents and spills do happen. They have happened in Garfield County with devastating results for the people affected. Threats are not just from what occurs, invisibly, deep in the earth: trucks hauling toxic chemicals have run off canyon roads and spilled their loads into surface waters, improper cementing of casings has allowed drilling mud to escape and contaminate ground and surface

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	water.
1302	The only sure way to protect our property rights and our right to a clean environment is to prohibit gas exploration in the drainages surrounding the North Fork of the Gunnison River.
1303	If, however, this is not politically tenable, then the Resource Management Plan should: Provide that activities on BLM land, including those of permittees and licensees and their agents, etc. will result in no detectable reduction in environmental values (air, water, noise, etc.) on private land in the air sheds and water drainage basins in which the activity takes place;
1304	Require comprehensive, independent and qualified air- and water-quality baseline data collection (for groundwater as well as surface) at the applicant's expense (perhaps through a substantial application fee). Such data should be publicly available. This would enable landowners to obtain redress in the event of loss or damage as well as to put the applicant on notice that we are serious about protecting the quality of our Valley, our property rights, and the viability of our agriculture.
1305	Hold the permittee or licensee strictly liable for any and all loss of environmental quality that occurs during the period of operation, and for a substantial period thereafter, without the aggrieved party being required to prove causation, under the established legal principle of 'res ipsa loquitor' (the thing speaks for itself).
1306	Provide that if a private landowner must sue for damages, or to enforce his/her property rights, and wins, that all costs and attorney fees are paid by the permittee in addition to damages.
1307	Require the permittee to provide a bond sufficient to cover all foreseeable damages, including attorney fees, to all private claimants who may be affected by profit-seeking activities on BLM land.
1308	In our particular case, Mesa Winds Farm's water comes from the Leroux Creek basin. Our organic certification relies on the quality of this water. Any contamination by drilling mud or 'frac-ing' fluids into Leroux Creek or its aquifers, tributaries, or reservoirs would result in the loss of our certification, loss of trust of our customers, and the loss of our established markets. We would be put immediately out of business. My wife and I put everything we have into growing delicious, healthy fruit and building our customer base. For an out-of-region energy speculator to eliminate those years of hard work toward a healthful and sustainable future simply because BLM regulations were too lax would be a tragedy. After-the-fact restitution would be cold comfort.
1330	Clearly, people have and will continue to invest in uranium. The demand realities of today, coupled with the projected doubling of the consumption of electricity worldwide by 2030 and the numerous nuclear plants underway throughout other countries, should clearly soften the peaks and valleys of the boom and bust cycle historically experienced.
1367	Ensure that no domestic, irrigation, surface, or ground water will become contaminated as a result of natural gas leasing, permitting, or unitization decisions by mandating that any leasee hire an independent company to monitor their practices and maintain water purity control.
1368	Create a publicly approved list of companies and/or agencies that can provide the necessary monitoring skills and manpower to closely regulate the impacts of drilling and transportation of gas on air, water, land, wildlife and humans in the regions of any drilling, wells and/or transportation pipelines and facilities.
1369	Mandate as part of a leasing agreement that such agencies be hired and maintained by the gas and oil companies and that their reports are maintained on file for public review and published in the main media of a given area. Regular public review opportunities shall be scheduled into the leasing agreements with the caveat that all activity must cease if there are breaches of the contracts or of regulatory standards.
1370	Prohibit the injection of toxic, hazardous, carcinogenic, or other potentially harmful fluids into the ground while drilling for natural gas on any federally leased, permitted, or unitized area and require that any leasee hire an independent company from a publicly approved list of monitoring agencies to ensure such adherence to strict standards.
1371	Require energy companies to fully disclose all drilling and hydraulic fracturing fluids. It has been my personal observation that such full disclosures are not currently nor have they been in the past adequately made. The practices of withholding vital information from the public for review is not acceptable.
1372	Ensure air quality will not be degraded as a result of natural gas leasing, permitting, or W1itization decisions and requiring all leasees to hire a third party approved independent monitoring company to ensure such air quality protection.

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1374	How can a government entity fail to protect its people and their resources. Air and water, to list a couple, are more precious resources than gas. Simply because the gas industry has more money (by earning it off of our lands) , and therefore more lobbyists should not mean that they are above some basic expectations. Please hold them accountable.
1376	I have been very concerned about the prospect of 011 and gas leasing in and about the North Fork Valley. While recognizing that energy production is a mandate given to the BLM, I would like this done with the highest level or responsibility possible and in such a manner that protections to human and wildlife health and habitat are given the highest priority.
1377	The NEPA was put in place to provide proper and legally mandated environmental reviews in the protection of my interests and I ask the BLM to see to it that they are.
1378	I understand well that energy Is needed and I have no issue in principle with obtaining it. I merely request that it be done with precautionary principles firmly established in leasing, regulation and enforcement. Ruining public lands in the name of short term private profits is folly. This has gone on for too long and things must change.
1384	Ensure that no domestic, irrigation, surface, or ground water will become contaminated as a result of natural gas leasing, permitting, or unitization decisions. This would adversely affect my business as an ORGANIC FARMER, which would set up possible legal action.
1386	I am a general contractor and sportsman and the affect I have seen on the movement of the elk herds and the changes in the natural landscape due to the drilling is alarming. I have a concern about the long term affect it will have upon the hunting and herd health in Delta County.
1388	These gas wells will likely contaminated the domestic springs and wells in the North Fork. When that happens, what is our recourse?
1389	Please don't allow hydraulic fracturing.
1391	We recommend that the Bureau of Land Management conduct the necessary planning and take into account the best available information so as to ensure that: Local wells, springs and potable ground water aquifers, currently developed and available in the future will not be contaminated or adversely affected by natural gas drilling and development;
1392	[Ensure that] US citizens, local and distant, will not see their water resources, potable and otherwise, adversely affected by the short-term access to the natural gas resource.
1393	[Ensure that] Drilling pads, access roads and all areas disturbed in order to access the natural gas resource are planned accordingly to prevent soil erosion and require the best available and most appropriate reclamation and remediation following natural gas drilling and development.
1394	[Ensure that] Compressor- and pump-stations are effectively planned and located so as not pose a safety threat to local residents, both within and without the federal land boundary, and not present adverse visual, noise or reasonable land use impacts.
1395	[Ensure that] Access roads are effectively planned so as to prevent and avoid dust and hazard as the natural gas resource is developed and produced
1396	The Bureau through its planning and and resource management role, that the energy companies through their planning role and the regulatory authority through its permitting and enforcement role will ensure that air, water and wildlife habitat quality and general natural resource health and welfare will not be degraded as a result of natural gas leasing, permitting, or unitization decisions;
1397	[Ensure that] The Bureau will protect private property rights by allowing affected private property and private surface rights owners, in the case of split estates, be actively involved in the planning and permitting process.
1398	[Ensure] That the Bureau will do its best within the flexibility of federal, state and local laws and regulations to prohibit oil and gas development on private land within a unitized area without the written permission of the surface property owner.
1400	I am not current resident in Delta County though I am planning on becoming one. The only way I would feel comfortable investing in the Delta County region would be to know that there is action against blindly continuing gas drilling on watersheds that feed the North Fork Valley i.e. Bull Mountain
1404	I am asking for a moratorium on all natural gas leasing and permitting until the plan revision is completed

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	because at times in the past, the BLM has failed to live up to this standard by leasing and permitting natural gas development without an environmental review and public input as called for under the National Environmental Policy Act.
1405	Ensure that no domestic, irrigation, surface, or ground water will become contaminated as a result of natural gas leasing, permitting, or unitization decisions.
1406	Prohibit the injection of toxic, hazardous, carcinogenic, or other potentially harmful fluids into the ground while drilling for natural gas on any federally leased, permitted, or unitized area.
1407	Require energy companies to fully disclose all drilling and hydraulic fracturing fluids.
1408	Ensure air quality will not be degraded as a result of natural gas leasing, permitting, or unitization decisions.
1409	Protect private property rights by prohibiting oil and gas development on private land within a unitized area without the written permission of the surface property owner.
1410	Require all natural gas leases and permits to protect wildlife habitat from fragmentation.
1412	Close to leasing all areas that are open to new oil and gas leasing in the current RMP. We can consider reopening these areas to oil and gas development twenty years from now in the next RMP if, in the ensuing time period, technology has been developed to extract these minerals safely.
1519	Until other real, economical, and renewable resources become plentiful, we will need uranium, oil, and gas. Plentiful energy resources equal security, prosperity, and peace for America.
1520	I strongly oppose any designation to our public lands that would inhibit our freedoms to utilize them for responsible mineral extraction or energy development.
1612	I am very concerned that oil and gas companies will destroy the quality of life here. Fracking is toxic. The drillers are exempt from Clean Air and Water Acts. Why? I'm not exempt.
1613	Also, the proposed evaporation ponds near Domniguez are a threat to health. Garfield County should keep the poison it has created.
1615	The drilling companies should provide full disclosure about the chemicals used and their effects. Rules should dictate that they cannot poison our environment AT ALL.
1617	Slow down until the technologies are SAFE. Note Maybe safe in a perfect world.
1618	Develop wind power here. It's cleaner.
1620	The proposed (and current) gas drilling is a direct assault on the well-being of citizens of Western Colorado. It is degrading the environment, including the water, air, animal and human habitat. The damage done to roadways and the loss of tourist income pale in comparison to the long term effects of the primitive technologies at work here, thoughtlessly polluting our beautiful land. It would be a shame to ignore scientific evidence for the sake of a quick money grab.
1621	I ask you to put a stop to gas drilling until (and if) safe technologies are put to use. Do not squander our precious resources. Consider your children and grandchildren. You can make a difference
1626	Oil and gas leasing should be prohibited in the Dolores River Corridor, or should at a minimum maintain No Surface Occupancy Stipulations. Impacts of development within the corridor are not consistent with protection of outstandingly remarkable values or the existing Special Recreation Management Area Designation.
1700	I am particularly concerned about gas development and pesticide use on public lands. I live in Oregon, but I use natural gas in my home, and we are being told that we don't liquefied natural gas terminals on the Columbia River (I agree with this!) because our gas can come from the Rockies! However, I'm aware that gas drilling in that area comes with huge potential costs, including water pollution. Although gas is relatively clean burning, the other costs to drilling are often not paid attention to. BLM lands are public lands, therefore I request that they be managed in a way that preserves them as much as possible in their natural state and that minimizes effects on climate change.
1711	However, I also favor coal, gas, oil, uranium extraction. But, when managing resource development, I would like the BLM to carefully consider the health and safety of the land and people when considering rates of mineral extraction, lease locations, methane venting, water quality and general development - particularly in roadless areas.

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1717	I want to say that I am particularly concern about the oil and gas development and about the chemicals used in the hydraulic fracturing process. I have worked with Xylene and Toluene before in a laboratory and the procedures we used with these chemicals were very stringent. Now the oil and gas industry states there is no proven harm to wells, air, water, and wildlife. How stupid do they think we are! Their "studies" I am sure have been skewed as well as the data. Anyone can do what ever it takes to back a certain desired result. Someone needs to read CIVIL Action. Please do what you can to lessen the defilement of my beautiful country.
1771	Any oil and gas development allowed under the RMP should be carefully constrained, subject to phased development that minimizes damage to unique natural features, essential wildlife habitat, and other sensitive areas.
1787	This is one of the most beautiful places I have ever been, and it would be a disgrace to our National Heritage if we exploit it for uranium, oil, gas, and destructive off road recreational vehicle use.
1918	The BLM should state unequivocally in the revised RMP that it is fully committed to managing publicly owned lands in a way that ensures both the health of the land and the people who live in and around those lands. With regards to oil and gas leasing and permitting, this means the revised RMP should state that BLM is fully committed to ensuring that no domestic, irrigation, surface, or ground water within the UFO shall become contaminated as a result of any leasing, permitting, or unitization decision. While we are cognizant of the fact that the risk of water contamination from natural gas production is low due to the depth of drilling, any risk to our water supply is unacceptable. Contrary to the claims made by industry, contamination of water supplies by benzene or related chemicals associated with drilling is not just a theoretical risk. According to Drilling Around the Law, a recent report published by the Environmental Working Group: In the summer of2008, in one of the few government tests ever conducted on water contamination near natural gas fields, the Bureau of Land Management found benzene in drinking water wells in Sublette County, Wyoming. The researchers did not identify where the contamination came from, but the only likely source in the otherwise rural area is intensive natural gas drilling involving hydraulic fracturing. The report also states that in 2008: Garfield County, Colorado officials released a study that linked methane contamination in local water wells to methane in the same rock layer a mile and a half underground, where gas companies are drilling. The scientists who conducted the study did not determine how the gas reached the wells, but their results provide evidence that gas or other contaminants from drilling can work their way to the surface from deep underground. If all lands in the Delta County region that are open to federal leasing were developed for natural gas production, the water sources of most private wells and the 25 domestic water suppliers in Delta, Cedaredge, Crawford, Hotchkiss, Paonia, and the county's rural areas would be at risk of contamination.
1919	Citizens For A Healthy Community is also concerned that drilling may contaminate irrigation water in our county. For example, leases on Bull Mountain and surrounding Paonia Reservoir run the risk of contaminating the Reservoir, which feeds the Fire Mountain Canal. This Canal is the largest agricultural irrigation canal in the North Fork Valley. Delta County's ranchers and their 37,000 head of cattle rely on irrigation as do the county's produce farmers. Delta County has 281,000 acres dedicated to agriculture and produces $45 million in agricultural products annually while employing approximately 1,109 people, or 13 percent of the County's workforce. As a fruit growing region alone, Delta County produces: • 77 percent of the apples in grown in Colorado; • 71 percent of the cherry's grown in Colorado (nearly half of these orchards are organic); • 53 percent of the state's pears; • 21 percent of the peaches grown in Colorado; and • the second-largest grape crop in Colorado. Contamination of our irrigation water in any of the dozens of canals in the County would have a devastating affect on the local economy. If BLM is fully committed to ensuring the health of the land and the people who live in Delta County, then it will make protection of our communities' water supply a top priority.
1920	Citizens for a Healthy Community believes the best way for BLM to demonstrate it is taking care of the health of the land and the people is to include a statement that the injection of toxic, hazardous, carcinogenic, or other potentially harmful fluids into the ground on any federally leased, permitted, or unitized area will be prohibited throughout the 20-year implementation period of the revised RMP.

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1921	BLM should place a moratorium on all leasing and permits for the development of any oil and gas facility (e.g., well pad, compressor station, pipeline, etc.) until the completion of the revised RMP.
1922	All areas that are open to oil and gas leasing in the current RMP should be closed to oil and gas leasing in the revised RMP. This is the wise and prudent course of action to take given the problems that are surfacing around the country regarding the hydraulic fracturing process. The issue of oil and gas leasing can be revisited in 20 years when the next plan revision is written. Hopefully, during the intervening years the industry will have sufficient time to development new technology for extracting natural gas in a manner that no longer threatens human health and the environment. This 20-year period will also provide Congress the opportunity to get up to speed on the issues and pass legislation to protect the community from the irresponsible natural gas development that is taking place.
1923	Citizens for a Healthy Community requests BLM make a commitment not to renew any leases that expire during the life of the revised RMP.
1924	The revised RMP should include language stating that prior to approving any permit for an oil or gas facility (e.g., well pad, compressor station, pipeline, etc.), BLM will conduct a NEPA EA or EIS. While this comment may seem unnecessary since the 2007 Surface Operating Standards and Guidelines for Oil and Gas Development already requires this, it should be noted that there have been times in the past when the UFO has failed to conduct a NEPA review prior to approving drilling permits.
1925	Citizens For A Healthy Community would like to remind BLM that all future NEPA analyses for proposed oil and gas facilities shall follow the U.S. EPA's recent aggregation policy. On September 22, 2009, Gina McCarthy, U.S. EPA Assistant Administrator of the Office of Air and Radiation, sent a Memorandum to all EPA Regional Administrators. This memorandum, with the subject heading Withdrawal of Source Determinations for Oil and Gas Industries, reversed a 2007 EPA memo that discouraged states from aggregating emissions. By doing so, U.S. EPA recognized that focusing on only one of the three regulatory criteria (adjacent or contiguous) for source determinations was insufficient. The memorandum states: Permitting authorities should therefore rely foremost on the three regulatory criteria for identifying emissions activities that belong to the same "building," "structure," "facility," or "installation." These are (1) whether the activities are under the control of the same person (or person under common control); (2) whether the activities are located on one or more contiguous or adjacent properties; and (3) whether the activities belong to the same industrial grouping 40 C.F.R. 52.21(b)(6). On October 27, 2009, WildEarth Guardians and twenty-two public health and environmental organizations sent a letter to Paul Tourangeau Director, Colorado Air Pollution Control expressing their concerns regarding EPA's aggregation policy. While this letter was not addressed to BLM, the concepts expressed apply to the UFO when considering permitting of natural gas drilling, compressor stations, evaporation ponds, etc. This letter stated: The issue of aggregation is extremely important to ensuring long-term protection and restoration of air quality, public health, and the environment across the United States. Many of you have seen the impact that increased oil and gas development has had on both rural and urban air quality. Rising ozone levels, regional haze, and air toxics are but a few. Many of these observed impacts are linked to the fact that oil and gas operations are individually small, yet collectively large, sources of air pollution. Aggregation provides an important opportunity to more accurately recognize integrated source operations under the Clean Air Act and ensure that oil and gas operations are regulated on a cumulative basis under PSD and Title V. In particular, it provides an opportunity to determine whether individually small sources of air pollution should be aggregated together as larger sources. To this end, the EPA's recent guidance and Title V petition ruling provide an important opportunity to immediately begin assessing whether and to what extent pollutant emitting activities related to oil and gas development should be aggregated as single sources in accordance with the "fundamental criteria for making source determinations." While we recognize that the question of whether to aggregate two or more pollutant emitting activities into a single major stationary source under PSD and Title V is a case-by-case determination, we urge you to conduct a full analysis for oil and gas operations that considers: • An evaluation of system maps for oil and gas operations, which shows all emission sources owned or operated by individual companies in producing oil and gas fields; • A determination as to whether and to what extent the various pollution emitting activities are contiguous or adjacent to, and under common control with, permitted or proposed to be permitted facilities; • An assessment of flow diagrams that show movement of oil and gas from the well sites to processing

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	facilities so that you may determine the nature of the sources' emissions and determine the interdependency of operations; and • An analysis of business information regarding the nature of control of operations to determine whether various pollution emitting activity should be considered under common control for purposes of making the source determination.
1926	All NEPA analyses conducted under the revised RMP should require energy companies to fully disclose all drilling and hydraulic fracturing fluids.
1927	All oil and gas leases offered under the revised RMP should contain a provision reserving the right of the federal government to impose any additional stipulations necessary to protect human health and the environment, including, but not limited to, no surface occupancy stipulations.
1929	The revised RMP should protect private property rights by prohibiting oil and gas development on private land within a unitized area without the express written permission of the surface property owner. The natural gas industry has a history of abusing private property rights. Currently, surface property owners have few rights to protect their homes or land from damage when the federal government leases the subsurface mineral rights. In fact, the law places the rights of the subsurface mineral owner above those of the surface landowner. No surface owner should be forced to accept an oil or gas well on their property without their permission.
1930	The revised RMP should require all oil and gas leases and permits to contain provisions to protect wildlife habitat from fragmentation.
1931	The revised RMP should require energy companies to pay financial assurance with sufficient funds to pay to restore the land to its original condition when wells are no longer producing. According to The Gold Book, companies are required to put up a minimum bond of $1 0,000 for oil and gas lease operations. In lieu of a $10,000 lease bond, a bond of not less than $25,000 for statewide operations may be required. According to Oil and Gas at Your Door? A Landowner 's Guide to Oil and Gas Development: A recent study indicates that the costs of plugging and reclaiming a single orphaned well site in the western states can range from $19,000 to $75,000. Based on these numbers, it appears that in most states financial assurance bonds are inadequate to cover the costs of properly plugging and restoring well sites . ... According to industry statistics, approximately 2% of the three million wells (i.e., 60,000 wells) that have been drilled in the United States are considered orphaned. As already mentioned, it can cost between $19,000 and $75,000 to properly plug and abandon a single well. That means that at the present time $1.1 billion to $4.5 billion of taxpayers' money will have to be spent to properly plug and abandon all of the orphaned wells in the U.S. With the actual cost of reclaiming a well ranging from $19,000 to $75,000, financial assurance requirements need to be increased to reflect this reality. In addition, the cap on the amount of money put into financial assurance regardless of the number of wells the company has drilled should be removed. With these measures in place, there will be some assurance that energy companies-not the American public-will bear the cost of adequately plugging and reclaiming well sites.
1932	The revised RMP should require oil and gas companies to install and/or retrofit their well pads and all other facilities with dark sky lighting that cannot be viewed from any neighboring property. Prevention of light pollution shall be accomplished by various means such as pointing lights down, shielding that lights only the ground, and automatic switches on non-essential lights that automatically turn off lights between 9 p.m. to 6 a.m.
1933	The revised RMP should require much of the recovered or produced water resulting from natural gas drilling to be reclaimed, purified, and made available for use by local communities. According to What You Need To Know About Natural Gas Production (a DVD produced by The Endocrine Disruption Exchange), one million gallons of fluids (mostly water) are typically used each time a well undergoes hydraulic fracturing. Each well can be fracked as many as ten times, and each well pad may contain up to 28 - 30 wells. Thus one well pad has the potential for contaminating and wasting 300 million gallons of water. Just seven well pads have the potential of contaminating and wasting 2.1 billion gallons of water, more than the 1.9 billion gallons of fresh water Delta County uses annually. In the arid west, it is inconceivable that BLM permits energy companies to contaminate and waste so much water in the process of extracting natural gas. A reasonable and prudent requirement of BLM would ensure much of this water is reclaimed, purified, and made available for use by the local communities as compensation for having to bear the brunt of natural gas activities.
1934	The revised RMP should require energy companies to provide site specific air quality monitoring data for a one-

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	year period prior to commencing construction of any new oil or gas facility and continue monitoring throughout the life of the facility. Further, the revised RMP should state that BLM is fully committed to ensuring that air quality in our region will not be degraded as a result of any leasing, permitting, or unitization decision. The industrialization of our wild areas by the natural gas industry is rapidly resulting in large increases in nitrogen oxides and volatile organic compounds being released in the air. When these two compounds combine in the presence of sunlight, ground ozone is produced similar to urban smog. This air pollution poses a serious threat to human health. In What You Need To Know About Natural Gas Production, Theo Colborn states: One molecule of ozone can bum a hole in the deep alveolar tissue in human lungs. It is well documented that daily exposure to ozone leads to early aging in the lungs. They become brittle and dry out. The lungs cannot repair this kind of damage. Every exposure incident builds on the damage that was already there. Chronic ozone exposure can cause asthma, chronic obstructive pulmonary disease, and other pulmonary diseases. Children are especially vulnerable. While ozone was always thought to be only an urban problem, today in rural and wild areas of Delta County and the Grand Mesa, we are experiencing urban levels of air pollution as a result of natural gas production. Deleterious health effects will likely increase in the future in our community if BLM does not protect our air quality.
1967	Management options that would protect or enhance opportunities to explore for and develop oil and gas resources will be examined.
1968	Management options for surface resource management that are compatible with oil and gas resource management objectives
1969	Reasonable mitigation measures designed to limit or avoid impacts to surface resources as a means to lessen restrictions on access to public lands for leasing
1970	Lack of oil and gas resource potential or current industry interest will not be used as a basis for closing lands or imposing constraints on exploration and development activities
1971	The effects on oil and gas opportunities from surface management is only tied to - not limited to – economic impacts. Access to public lands for purposes of exploring for and producing oil and gas resources must be considered a separate issue from economic impacts. It is necessary to explain how surface management constrains the availability of public lands for leasing, exploration and potential development. Moreover, compliance with the various leasing laws that require all lands to be evaluated for lease is an access issue that has nothing to do with economics.
1972	Effects on opportunities to explore for, lease, and develop oil and gas resources resulting from restrictive surface management decisions.
1977	BLM is responsible for assessing the potential for occurrence of oil and gas resources during the analysis process. The mere lack of potential or lack of current industry interest must not be considered a basis for closing lands or imposing severe constraints on future development. Levels of interest can change overnight, rendering an area previously considered to have low potential highly prospective due to new information, technology or economics. It is important that future opportunities to explore for and develop oil and gas resources not be indiscriminately foreclosed.
1979	Section 1502 of the Council on Environmental Quality Regulations on the National Environmental Policy Act directs that mitigation measures be identified in the EIS which may be employed to reduce or entirely avoid impacts to other resource values. While this could be construed to mean that only lease stipulations need to be identified, it is also important to discuss other types of mitigation which may be utilized at the time of oil and gas drilling, both exploration and development, such as area-wide standards and guidelines for oil and gas operations. This information is necessary because it illustrates that with appropriate mitigation, oil and gas activities are compatible with other resource uses, including those in sensitive areas.
1980	Many past BLM planning documents have discussed the impacts oil and gas activities may have on other resource values, but they have failed to adequately describe the effects surface resource management decisions may have on future subsurface opportunities and activities. Therefore, we strongly urge BLM to specifically describe the impacts of surface management decisions and trade-offs as they relate to future oil and gas leasing and development opportunities.
2044	Oil and Gas Leasing and Development Oil and gas leasing, exploration, and development should be prohibited in the Dolores River Corridor, certainly within visual proximity of the river itself.

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2139	In January of this year Secretary of the Department of the Interior (DOI) Ken Salazar issued Secretarial Order 3294 that states: It is the policy of the Department to take affirmative steps to improve the efficiency, effectiveness, and accountability of its management of energy resources on Federal lands and the Outer Continental Shelf (OCS). Coordinating, reforming, and planning energy development and oversight activities among the MMS, BLM, and OSM and other Federal agencies are necessary to ensure that we effectively carry out our statutory, regulatory, and ethical responsibilities; remain responsible stewards of the public resources that we manage; and obtain fair value for resources owned by the public. Instructions for BLM field offices are among the proposed leasing reform policies and include: a greater detail of analysis regarding the impacts of leasing and development in the proposed area; ensuring greater public involvement; identifying key issues such as protection of air quality, watersheds, wilderness, wildlife and nearby land uses; and identifying appropriate leasing and development mitigation measures to protect the environment. Some other differences between current policy and the proposed reforms include the requirement of field offices to: use interdisciplinary teams to carefully conduct a comprehensive review of proposed parcels, conduct an on-the-ground reconnaissance of parcels, identify interested groups and individuals to seek their involvement and prepare an environmental review document to evaluate existing, revised and/or new stipulations and invite the public to review and comment on the draft document. The BLM will use the environmental and public review to address important resource values and to identify appropriate mitigation measures for protection of the environment. The DOI is expected to issue an instructional memorandum shortly to mandate the proposed reforms and the UFO RMP should incorporate these changes which will provide the opportunity for more public participation, allow for more thorough determinations regarding lease sales and will reduce the need for protesting and litigation to have parcels removed from consideration for leasing. These reforms will be crucial to ensuring the proper management of fish and wildlife in the face of energy development and, in turn, the stability and opportunity for fishing and hunting in the UFO management unit.
2174	On page 16 of the Preparation Plan for the UFO, there are numerous questions relative to oil and gas, including which areas should be open to leasing, closed to leasing, open with moderate constraints, open with major constraints, and which lease stipulations should be employed. These questions should all be answered in a new leasing decision for the UFO.
2175	The 1991 Oil and Gas Leasing Decision and accompanying EIS are outdated and in need of revision. A new oil and gas leasing decision should be part of the UFO RMP revision. This new oil and gas leasing decision should make a determination whether specific lands are open or closed to leasing and if specific lands are open to leasing, what leasing stipulations will apply. While these decisions should account for valid existing leases, rights, decisions made regarding availability for oil and gas leasing and stipulations should be new decisions and not amendments to the old 1991 Oil and Gas Leasing Decision and EIS. In addition, new Administrative leasing policy has significantly changed to where a new oil and gas leasing decision should be undertaken.
2179	Also with regard to split estate oil and gas, stipulations developed for resource protection should apply to all new leases regardless of who owns the surface. In order to meet the consistency requirements of Federal Land Policy and Management Act (FLPMA), the BLM should apply the same standard of environmental protection to split estate lands as to federal surface. Also, the BLM has responsibilities to apply stipulations under the National Environmental Policy Act (NEPA) because the issuance of a lease and potential approval of applications for permit to drill are federal actions.
2260	Directional drilling. Gas producers should be required to drill multiple wells from single pads whenever possible to decrease surface disturbance.
2261	Well pad density. The allowed density of well pads should be determined on a case-by-case basis to decrease negative effects on the air, water, wildlife, views, and quiet.
2262	Clustering of pads. Clustering of pads should be considered because in some cases clustered pads may cause less overall surface impact than the same number of pads evenly distributed over more acreage.
2263	Comprehensive plans. Please continue your excellent efforts to encourage development of comprehensive plans. APDs should not be approved unless the proposed wells are included in a long-term area-wide plan
2264	Cumulative impacts. When making decisions as to lease stipulations or APDs, the BLM should consider total impact of drilling including associated roads, road traffic, pipelines, lights, noise, etc.
2265	GMUG IRAs. No leases that allow surface occupancy should be sold in GMUG Inventoried Roadless Areas (IRAs). No leases should be sold in the 300-foot setback zone on either side of existing roads in GMUG IRAs. If

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	there are already leases in the setback zones, these should not be permitted for drilling
2266	Split-estate. On split-estate lands, landowners have most problems with water quality, air quality, and noise, and the BLM should do all possible to minimize such problems.
2267	Set backs from residences. At the very least the set back requirements of pads and other facilities from residences should be increased to 200 meters.
2268	Environmental monitoring. Air, water, and noise monitoring should be ongoing with remote reporting so problems can be detected quickly and rectified.
2269	Visual and noise pollution. Require vegetative buffers or constructed barriers to block noise and hide eyesores. Require mitigation of noise from trucks, heavy equipment, and compressors, etc. in populated areas or wildlife birthing and nesting areas.
2270	Ground-water contamination. Ground-water contamination is perhaps the most crucial issue since once an aquifer is compromised it cannot be recovered. Any failure of well casings or any other occurrence that introduces drilling materials, frac fluids, fuels, produced water or any other potential contaminant into domestic or livestock wells should be prevented by state-of-the-art engineering.
2271	Bonding. Bonds should be sufficient to cover the value of any public lands or private property harmed by gas activities, including water pollution and loss of agricultural production. The size of such bonds should be based on an accurate assessment of possible harm, and should not be limited to the minimum set forth in the Gold Book (p. 13). It is not an adequate response for the operator to simply provide an alternative source of water. These bonding requirements need to be passed on to any subsequent owners of wells.
2272	Watershed protection. The Water Conservation Service (WCS) has defined setbacks that exceed the COGCC rules for protection of these water sources and delivery systems. The BLM should stipulate no-surface-occupancy (NSO) within these WCS-determined watershed setbacks. Moreover, dependent on the watershed, larger areas might need to be stipulated as NSO for adequate protection. Each watershed needs to be fully characterized in terms of recharge area, slope characteristics, vegetative cover, etc. so as to safely determine how
2273	Air quality protection. In areas where air flow could transport dust, other particulates, or gases that could be annoying or hazardous to health, the BLM should consider NSO stipulations on leases.
2274	Evaluation guidelines. The RMP should state clearly what BMP's, lease stipulations, and conditions of approval will be employed in areas open to leasing.
2276	Fracing fluids and produced water. Conditions of approval for drilling should include full disclosure of chemical constitution of fracing fluids. Likewise, there should be regular analysis and disclosure of the chemical composition of produced water because of the possibility it contains chemicals like toluene and benzene. If such volatile carcinogenic materials are present they should not be stored in such a way that they contaminate air. Requiring closed loop drilling may help prevent spillage and leaks from surface storage of drilling muds, fracing fluids, and produced water
2277	Water protection. As a condition of approval, the BLM should require the developer of a well to collect baseline data on all ground water and surface water sources that could possibly be contaminated. Continued monitoring should continue during the lifetime of the well. This obligation should transfer to any new owners of such wells. Irrigation water sources and canals are essential to our agricultural base and need protection from contamination.
2278	Storm water management. Runoff from well sites must be managed in a more effective way than using straw bales or the plastic sheeting that collapses under snow conditions.
2279	Restoration versus reclamation. Well pads or other areas where native plants have been disturbed should be restored to natural conditions, including similar mixes of species and several stages. Roads created for development should be obliterated and made impassable to off-road vehicles when no longer needed
2280	Holding leases by production. The BLM needs to apply valid economic criteria in determining whether a lease is held by production. Simply drilling a well should not be grounds for "holding by production." Instead, there must be a realistic likelihood, based on the production of gas and the cost to connect to a pipeline, that the well will eventually be connected to a pipeline, i.e. that it will eventually be producing in the sense of getting gas to market. Because drilling costs are currently low, operators may be tempted to drill wells to hold leases that

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	they have little or no likelihood of bringing into production. To make such economically-based assessments, the BLM must have access to personnel qualified to judge whether a given test volume is meaningfully economic at prevailing gas prices, including consideration of how quickly the well's initial output would decline.
2303	I am very concerned that the Bureau not make irrevocable decisions adversely affecting our limited long-term water supply in order to promote the short-term access to the more temporary energy resource. When the natural gas is developed and gone, we will find other energy resources; but when the water is exhausted, or polluted, we may not be able to replace that water resource. However, I clearly recognize that the Bureau, representing the USA, take all reasonable and prudent steps to reasonably develop the nation's energy resources in order to meet the nation's energy needs, but do so effectively balancing, planning and protecting the many other resources it is responsible to manage and protect.
2304	I am very concerned that the Bureau conduct the necessary planning and take into account the best available information so as to ensure that: That local wells, springs and potable ground water aquifers, currently developed and available in the future will not be contaminated or adversely affected by natural gas drilling and development
2305	That all US citizens, local and distant, will not see their water resources, potable and otherwise, adversely affected by the short-term access to the natural gas resource
2306	Drilling pads, access roads and all areas disturbed in order to access the natural gas resource are planned accordingly to prevent soil erosion and require the best available and most appropriate reclamation and remediation following natural gas drilling and development
2307	Compressor- and pump-stations are effectively planned and located so as not pose a safety threat to local residents, both within and without the federal land boundary, and not present adverse visual, noise or reasonable land use impacts
2308	Access roads are effectively planned so as to prevent and avoid dust and hazard as the natural gas resource is developed and produced
2309	The Bureau through its planning and resource management role, that the energy companies through their planning role and the regulatory authority through its permitting and enforcement role will ensure that air, water and wildlife habitat quality and general natural resource health and welfare will not be degraded as a result of natural gas leasing, permitting, or unitization decisions
2310	That the Bureau will do its best within the flexibility of federal, state and local laws and regulations to prohibit oil and gas development on private land within a unitized area without the written permission of the surface property owner
2312	I am writing to express my deep concerns about continuing to sell permits for oil and gas drilling within the public lands in which you manage.
2314	My first concern is for the safety of the water within our watershed of the North Fork of the Gunnison River. If the water within this watershed is contaminated in any way my livelihood will be gone. When I watched presentations by the oil and gas companies last weekend, I was deeply concerned by the issues they failed to address. Even if the depth of drilling is different than the surface water sources, there was no discussion of evaporation ponds, spillage, or transportation of fracturing fluids, to name a few. Given the current record of mistakes around western Colorado by this industry, I ask that protection of water resources as well as air quality be number one on your priority list for resource management. If the air and/or water quality in our area are compromised in any way, that will greatly affect the management of all other resources!
2317	I would like to voice my concerns about the current coal bed methane gas leasing and production on public land. I like to hike and ski in the Colorado back country and am saddened to see so much of the country I love be under lease for gas drilling. I do not believe this land should be leased for drilling until it can be proven absolutely safe.
2389	Drilling, drilling and more drilling until every patch of our federal land is spoiled with stinking oil or gas operations, cut up with roads and pimpled with pits and dumps...Not the way to go.
2399	I recently watched a TV documentary on the "fracking" method of extracting gas and oil in Colorado and other states that is highly hazardous to the health of residents due to the resulting water supply contamination. The devaluation of homes and property in the affected areas was devastating, but the worst ramification was the severe, chronic and irreversible health issues suffered by humans and animals. PLEASE do not allow

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	unrestricted mining!
2409	Please protect this area as much as possible from off road use and drilling for oil and gas. This is a great place for people who want peace and quiet.
2451	Must we pave all the parks? Please allow for some natural areas devoid of mining and drilling.
2477	We have lost so much of our natural Wilderness to development and oil and gas drilling. We must protect what little remains.
2479	Thank you for giving me the opportunity to comment on the Uncompahgre RMP revision. The Uncompahgre Field Office encompasses some of Colorado's most beloved wilderness-quality lands, wild rivers, and opportunities for quiet, backcountry recreation. The resource area is also home to important and imperiled wildlife, such as Gunnison sage grouse, that rely on large intact tracts of habitat free from roads and other infrastructure. Please keep Big Oil out of this land as these lands are dwindling every day by the greed of the Oil Industry to control our public lands and our government with this obscene profiteering to keep us addicted to their product and prevent us from finding and developing alternative energy sources that don't contribute to the acceleration of global warming.
2486	Any oil and gas development is comparatively meager in its usefulness and value over the long run, especially when the carbon dioxide liability is subtracted
2489	No oil or gas development should allowed under the RMP should be allowed, because even if oil and gas development is carefully constrained, the idiots who run those things will create a hazardous environmental threat, even if BLM leaseholds agree to be subject to phased development that minimizes damage to unique natural features, essential wildlife habitat, and other sensitive areas
2494	The thought of allowing uranium mining or gas and oil development is just wrong - and off-road vehicles should never be allowed. All of these things will destroy the magic that was millions of years in the making. It makes me shudder to even think that this is being considered
2504	Thank you for the opportunity to comment on the Uncompahgre RMP revision. No off-road vehicle use, fossil fuel drilling, or mining should be allowed. Protect the land's biological integrity.
2518	Any oil and gas development allowed under the RMP should be carefully constrained so that it minimizes damage to unique natural features, essential wildlife habitat, and other sensitive areas.
2524	To the extent that any new oil and gas development is going to occur-and we need to keep it at an absolute bare minimum-it MUST be kept securely FAR AWAY from sensitive areas like the Dolores River Basin and the Uncompahgre.
2615	No mineral, oil and gas leasing or development should occur in roadless and/or wilderness quality lands or habitats for sensitive species
2616	No new leasing should be allowed until existing leases expire or are developed.
2692	If you can put a stop to this, do it. This country has GOT to get serious about weaning itself off fossil fuels and developing green alternatives. We just have to. To allow the pillaging of this precious natural resource merely to stall the arrival of the inevitable -- the end of fossil fuels -- is unconscionable. (And we still don't know what to do with nuclear waste.)
2830	Oil and Gas Management a. Scope of Oil and Gas leasing 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 office 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. 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. FLPMA obligates the BLM to abide by the principles of multiple use and sustained yield, especially during the land use planning process. Specifically, multiple-use is defined as: ...the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and non-renewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and

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	fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output. 43 USC. § 1702(c). The definition of multiple use makes it clear that the BLM is obligated to manage the land for a number of resources other than oil and gas leasing, and states specifically that the BLM should manage some land for less than all of the resources and should not always be concerned with managing the land in order to receive the greatest economic return. The definition of multiple-use makes it clear that simply because a particular resource exists does not mean that the BLM needs to be able to extract that resource for a profit. It is well within the realm of BLM's multiple-use mandate to not have a significant portion of the Uncompahgre Field Office open to oil and gas leasing. Further, BLM should consider alternatives which choose not to re-lease areas formerly leased when those leases expire or are terminated. Areas where there are specific resource concerns or that are identified as important habitat should be considered for other uses besides oil and gas leasing. These areas may include, but are not limited to: Areas of Critical Environmental Concern, Special Recreation Management Areas, Potential Conservation Areas, critical habitat, areas with cultural resources, proposed wilderness and lands with wilderness characteristics. BLM's answer to charges that it is not adequately protecting resources from oil and gas impacts is often to provide leasing with No Surface Occupancy (NSO) stipulations. While NSO stipulations are a marked improvement over offering leases with standard lease terms, it is important to note that NSO stipulations do not necessarily resolve the wildlife and other resource concerns associated with oil and gas leasing. There are adverse consequences to wildlife associated with oil and gas development, regardless of whether or not there is an NSO stipulation on the lease. An example of this, noted by Clait Braun (2006) in A Blueprint for Sage-grouse Conservation and Recovery, a copy of which is attached to these comments, is that "oil and gas development influenced the rate of nest initiation of sage-grouse in excess of 3 km of construction activities.- Clearly, the amount and (likely) frequency of noise associated with development has major negative effects on greater sage-grouse." Further, BLM often offers companies exceptions, modifications or waivers from the application of NSO stipulations. Having NSO stipulations on a majority of the lands within the field office is better than allowing surface occupancy in terms of wildlife and resource concerns, but that does not supplant the BLM's obligation to manage for a variety of resources, of which oil and gas is only one. 2. NEPA requires the BLM to consider and evaluate a reasonable range of alternatives for oil and gas development. The range of alternatives is "the heart of the environmental impact statement." 40 C.F.R. § 1502.14. 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). "An agency must look at every reasonable alternative, with the range dictated by the nature and scope of the proposed action." Northwest Envtl Defense Center v. Bonneville Power Admin., 117 F.3d 1520, 1538 (9th Cir. 1997). An agency violates NEPA by failing to "rigorously explore and objectively evaluate all reasonable alternatives" to the proposed action. City of Tenakee Springs v. Clough, 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., Kootenai Tribe of Idaho v. Veneman, 313 F.3d 1094,1122-1123 (9th Cir. 2002) (and cases cited therein). For this Draft RMP, the consideration of more environmentally protective alternatives is consistent with the requirement of FLPMA to "minimize adverse impacts on the natural, environmental, scientific, cultural, and other resources and values (including fish and wildlife habitat) of the public lands involved." 43 U.S.C. §1732(d)(2)(a). 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)." Colorado Environmental Coalition v. Dombeck, 185 F.3d 1162, 1174 (10th Cir. 1999), citing Simmons v. United States Corps of Engineers, 120 F.3d 664, 669 (7th Cir. 1997). This requirement prevents the EIS from becoming "a foreordained formality." City of New York v. Department of Transp.• 715 F.2d 732, 743 (2nd Cir. 1983). See also, Davis v. Mineta, 302 F.3d 1104 (10th Cir. 2002). 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. 3. 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. BLM has an opportunity in this RMP to make great strides in conservation and habitat restoration. However, the

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	long term viability of these strategies, programs and goals could be severely impacted by oil and gas development. Oil and gas development is known to cause a variety of problems that are detrimental to wildlife, and by leaving nearly the entire planning area open to leasing, the BLM may undermine any conservation efforts or goals it identifies in the RMP. The West is pockmarked with many places which were left open to oil and gas leasing based on the belief that these areas had low potential for development. As a result, when an economically recoverable reservoir of oil and/or gas was discovered, the area had insufficient protection measures in place. This lack of forethought has created many problems for wildlife and other resources. The impacts from oil and gas development are now well known, as such, areas of high ecological or cultural resource density should simply not be available for leasing. For example, Clait Braun, a leading researcher on sage grouse in the west, has stressed the impacts that oil and gas development can have on sage grouse populations: Road building, well pad construction, and noise disturbance associated with oil and gas development can fragment effective sage grouse habitat and compromise the quality of seasonal use areas. In addition, by creating more linear areas and smaller habitat patches, energy development can boost predation rates on sage grouse. So, for a variety of reasons, major oil and gas development reduces the area useable by sage grouse, which often leads to greater isolation of populations and a reduced ability to handle droughts, severe winters, or other natural disturbances20 BLM simply cannot expect to have ecologically effective sage grouse habitat, or any other type of important wildlife habitat, and unlimited oil and gas development in the same area. A situation arrives in which the goals, programs, and designations BLM uses to protect a valuable resource is only effective until such time that the right technology and/or price of oil and gas reaches a point that a previously non-economically extractable supply becomes economically extractable, or until a previously unknown supply not thought to exist is discovered. History tells us that BLM must consider the impacts of oil and gas development across the planning area and close areas which have important wildlife, cultural, or wilderness values. 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 U.S.C. § 1712(c)(1) and 40 C.F.R. §§ 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 discussed later) should be developed to protect the many resources present in the planning area. 20 This paragraph is adapted from detailed scoping comments on Upper Green sage grouse population trends and management issues prepared by Dr. Braun and submitted to the Pinedale BLM in October, 2002. Contact Linda Baker, Upper Green River Valley Coordinator (307-360-7198) to receive a copy of his 14 page comment letter.
2831	Additional Impacts of Oil and Gas leasing NEPA requires that federal agencies take a "hard look" at the direct and indirect environmental impacts of oil and gas development before any action that will lead to such development takes place. See, e.g., Pennaco Energy, Inc. v. U.S. Department of the Interior, 377 F.3d 1147 (10th Cir. 2004); Conner v. Burford, 848 F.2d 1441 (9th Cir. 1988); Sierra Club v. Peterson, 717 F.2d :1.409 (D.C. Cir. 1983). NEPA's regulations further provide that the "effects" on the environment that agencies must consider include those that are "direct, indirect, or cumulative." 40 C.F.R. § 1508.8. The NEPA regulations define "cumulative impact" as: the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. 40 C.F.R. § 1508.7. (emphasis added). The analysis of impacts included in the FEIS must adequately address the cumulative impacts of oil and gas operations within the region or the impacts inherent in the proposed action. Federal case law amplifies that agencies must disclose the direct and indirect environmental effects a federal action will have on non-federal lands. See City of Davis v. Coleman, 521 F.2d 631, 677-81 (9th Gr. 1975) (where federal approval of highway project likely to have impacts on development of surrounding area, agency must analyze development impacts in EIS); Coalition for Canyon Preservation v. Bowers, 632 F. 2d 774, 783 (9th Cir. 1980) (same); Sierra Club v. Marsh, 769 F.2d 868, 877-89 (1st Cir. 1985) (striking down EA where agency failed to account for private development impacts likely to result from its approval of causeway and port facility); Mullin v. Skinner, 756 F.Supp 904, 920-22, (E.D. N.C. 1990) (striking down EA where agency failed to account for private development impacts likely to result from agency approval of bridge). Such impacts must be disclosed,

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	particularly where facilitating private development may be the project's "reason for being." See Citizens Comm. Against Interstate Route 575 v. Lewis, 542 F.Supp. 496, 562 (S.D. Ohio 1982). BLM must consider impacts of region-wide development and also consider impacts on private lands. Existing development from neighboring planning areas as well as development within the field office affects the Uncompahgre planning area. Similarly, although the BLM may not have formal control over adjacent private lands, these lands can also be affected by oil and gas development. The impacts of oil and gas development do not recognize management boundaries. 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.
2832	Best Management Practices Significant portions of the Uncompahgre 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. 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 Uncompahgre 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.

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180	I feel that a vocal minority of anti-access groups have pressured the BLM to restrict resource exploration including gas and coal at a time when our nation needs these resources to reduce our dependency on foreign resources purchased from countries that don't particularly like Americans. We need monitoring and governance but we need to continue/increase our use of these resources in a way that is beneficial to all Americans and will help us reduce our dependency on foreign resources.
190	I also feel more land needs to be made available for the publics good, including resource exploration, powerline construction, and general community uses.
209	BLM planning must balance a lot of conflicting wants. But BLM needs to preserve access to minerals, coal, oil and gas, uranium and sand and gravel. These minerals are used to provide needs to the nation, jobs to residents tax revenue to governments. Land removed from development reduces all of the above.
256	Locatable minerals- Reclamation lands are generally closed to location of minerals, but there may be some valid existing rights related to locatable minerals that should be addressed
257	Leasable minerals- Where Reclamation lands are underlain by federal leasable minerals or resources, Reclamation determines whether or not leasing is permissible. Also, BLM will not issue permits, leases, or licenses on lands under Reclamation management without Reclamation's consent and concurrence on all conditions and stipulations
258	Mineral materials- The sale of mineral materials on Reclamation lands falls within the responsibility of Reclamation.
485	My family came to Ouray Colo. In the late 1890's and helped develop and mold Colorado as we know it today just like the timber and cattle industry did, so… ...In my opinion there are to many regulations and imposition on our lands today, please continue to let us protect in a recreational way and enjoy our out doors the way the good lord has intended for us to do.
492	Ranching, placer mining, uranium mining, wildlife developments, recreation are among some of the areas for growth.
568	Uranium should be left in the ground... it's a non-renewable resource and mining it can't go on forever anyway.
628	Finally, I'm hoping you'll take a hard look at uranium development in that area, and protect land, water, wildlife and residents with sensible development.
767	Coal resources exist in the RMP that are in jeopardy of being locked up by overzealous regulation by Roadless and other regulatory devices. These resources will be needed by future generations and should be kept available. Coal Creek Leroux Creek, NF Valley, Huntsman Ridge, Raggeds Field.
921	There should be no new coal leases unless the land is adjacent to an existing active coal lease. Capture of methane from coal mines should be strongly encouraged, perhaps as a stipulation of coal leases.
923	Uranium mining should not occur near domestic or irrigation water sources or near any flowing or subsurface water.
1069	NO OPEN VENTING OF METHANE from coal mines;
1199	The 1989 Uncompahgre Basin RMP proposed that both Fairview and Needle Rock ACECs be withdrawn from mineral entry and location to assure that mineral exploration and development do not result in the degradation of their natural features. CNAP recommends the continuation of mineral entry withdrawals.
1202	Both Natural Areas have been closed to disposal of mineral materials in the 1989 Uncompahgre Basin RMP. We recommend continuation of this closure.
1319	We are a Colorado limited liability company in the uranium and vanadium business with significant property holdings, much of which is mineral rights on BLM-administered lands. We appreciate the opportunity to provide input for your revisions to the RMP.
1322	We know that many people either choose to ignore legal mineral rights or simply do not understand the laws of our land. We are confident that the BLM does understand the law and trust that any revisions to the RMP will not be an attempt to take away legally existing and acquired property rights (nor be a defacto takings by making access or development of mineral rights unnecessarily delayed, overly cumbersome or unjustifiably cost prohibitive).

Table C-17
Issue 2: Minerals and Mining

Comment ID	Comment
1326	So, while you ask for input via RMP Planning Fact Sheet 7.2 "Are public lands that should be withdrawn from mineral entry because of conflicts with other public land uses?" we candidly wonder why the question isn't "why aren't public lands so uniquely mineralized with such an important resource not withdrawn from other public land uses and reserved solely for mineral extraction?" We hope this is not a BLM bias against mineral activities.
1327	In any event, there is no other area like this in the rest of the U.S. Given the planned development of the DOE lease blocks, and given the inability to mine uranium where it wasn't deposited (contrasted with many alternatives for most recreation uses), we think it makes sense for BLM to develop a uranium district as the highest and best use of the land in the western end of the RMP and for our entire country.
1331	If BLM wishes facilitate economic growth in the uranium sector, we have a few thoughts that begin and end with anything that streamlines the permitting process. You may be aware that Behre Dolbear Group Inc., a prominent worldwide minerals industry advisory firm founded in 1911, just released their annual ranking of countries for mining investment. The U.S. was dead last in the world for permitting delays (for clarification, "the issue addressed here is not the strength of the regulations but the timeframe involved in obtaining permits"). Any positive change will encourage investment.
1335	That said, when this topic is discussed, we would encourage BLM to distinguish between the standards of today and the standards of yesteryear. Clearly, the mining industry was not perfect. Clearly, our government encouraged rapid extraction at any cost when our nation was trying to defeat our enemies and tyranny in WWII and has a great deal of responsibility they assumed then (but which seems to get forgotten now). Clearly the governmental standards were different back when.
1352	That public lands, containing potential coal resources of the Dakota Formation, be recognized, made ·available for potential leasing, and delineated on the revised RMP maps.
1353	That coal exploration drilling be recognized and spelled out as an allowable and expected activity on public lands containing potential coal resources.
1354	Coal exploration drilling could be conducted under the purview and stipulations of such authorizations as the old "special land use permit" (SLUP), the Federal "Coal Exploration License", or Colorado DRMS's Notice of Intent (NOI) to Conduct Coal Exploration.
1355	The desire to explore for potential coal resources on public land, be it one hole or dozens, should not trigger a full-blown Environmental Assessment.
1380	Recognize that the minerals contained in our public lands belong to all of us and that no one should be allowed to extract them except as a service provided to the public.
1381	Recognize that mineral resources have a much greater value than the cost of extracting them from our public lands, and that we are all entitled to the royalties that come from their sale.
1627	Finally, the revised management plan needs to address how uranium mining in the area will occur to ensure proper protections and prohibit leasing within the river corridor. BLM must ensure that all state and federal laws are applied to any permitted mines. The BLM must also ensure that a viable long-term plan for dealing with any radioactive or contaminated materials as well as any other waste products is securely in place. All permitted mines must: • prove that there will be no harm to both surface and ground water quality and quantity; • prove that the long-term ecological health of the area will not be jeopardized; • have viable reclamation plans in place before permits can be granted; and • have an adequate bonding mechanism in place sufficient enough to cover the entire cost of reclamation.
1631	For the entire planning area, BLM should prescribe strict conditions for uranium mining, to make sure the damage to the natural values are minimized. Provisions should be included for disposal of any radioactive or contaminated waste materials, so miners will not leave these toxic wastes for the taxpayers to clean up, as often happened in the past. BLM must be sure all mining operations are properly bonded under applicable state and federal laws.
1645	Have an adequate bonding mechanism in place sufficient enough to cover the entire cost of reclamation. This last point is so important after CO citizens have been saddled with a billion dollars in clean-up due to past inadequate bonding.

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Issue 2: Minerals and Mining

Comment ID	Comment
1646	I am part of a large group of CO citizens that believes there is NO viable long-term plan for materials taken from radioactive geologic strata, and that allowing more such mining to occur is very unwise.
1650	Western Colorado is an important area for me as a hiker and camper. I have recently visited the old uranium mining area south of the current area in question. It was horrifying to me to see the state of the land left by the miners in SW Colorado. Once beautiful country is now torn up by the miners and their vehicles. This damage will take millenia to heal.
1652	As someone seeking the beauty nature provides, I do not find solace here. Nor can I walk anywhere without worrying about radiation exposure. PLEASE do not turn more of Colorado's beautiful land into another disaster zone. Can you not see how irreplaceable it is????
1691	The BLM must put the health and safety of the land and people ahead of mineral extraction.
1692	The BLM should not allow new coal leases in areas not adjacent to existing mines.
1693	The BLM should find a way to ensure that methane vented from coal mines can be captured and used.
1695	The BLM must ensure that uranium mining does not jeopardize the surface and ground water quality or the long-term ecological health of the area.
1705	It would be really fantastic for the BLM to insure sufficient regulation to encourage miners and companies to also be good stewards of our land, including exploring technologies for re-using and recycling, such as methane capture and re-use, to minimize human impacts relative to resource extraction. Please limit creating additional roads for natural resource mining as well, and look very strongly at water conservation and contamination.
1772	The RMP should impose strict limits on uranium and other mining to protect our land, air and water.
1866	Uranium Mining The revised management plan needs to address conditions that will be placed on future uranium mining in the planning area. There is established federal case law that mining operations must comply with land management plans, and that federal agencies have the authority to restrict or prevent mining based on compliance with land management plans. We request that the RMP prohibit mining related activities in areas of ecological significance such as river corridors, WSA's and ACEC's as well as SRMA's to protect quiet recreational experiences. All permitted mines must: prove that there will be no harm to both surface and ground water quality and quantity; prove that the long - term ecological health of the area will not be jeopardized; have viable reclamation plans in place before permits can be granted; and have an adequate bonding mechanism in place sufficient enough to cover the entire cost of reclamation. BLM must ensure that all state and federal laws are applied to any permitted mines. The BLM must also ensure that a viable long-term plan for dealing with any radioactive or contaminated materials as well as any other waste products is securely in place. The BLM must follow up with a regular inspection and monitoring program to ensure that violations are not occurring or not allowed to occur over a long period of time.
1867	We also urge reclamation and restoration of past uranium mining scars within the planning area.
2024	Rock extraction We question the advisability of permitting rock operations that extract rocks from Dakota Sandstone rim rocks. Rocks hold soil in place and provide scenic value to these lands that should not be shipped to Aspen.
2050	The revised management plan needs to address conditions that will be placed on future uranium mining in the planning area. There is established federal case law that mining operations must comply with land management plans, and that federal agencies have the authority to restrict or prevent mining based on compliance with land management plans.
2053	All permitted mines must have viable reclamation plans in place before permits can be granted; and have an adequate bonding mechanism in place sufficient enough to cover the entire cost of reclamation.
2054	BLM must ensure that all state and federal laws are applied to any permitted mines.
2257	The BLM should only allow new coal leases in Inventoried Roadless Areas where the leases would be adjacent to existing mines. The pristine sections of the Grand Mesa National Forest on the south slope of the Grand Mesa that have been designated as IRA represent the only remaining link for wildlife travel/migration between the wilderness areas of the Elk Mountains and the Grand Mesa. Linkages such as these are crucial to maintaining genetic diversity among resident populations of all species in this area.
2259	The BLM should find a way to ensure that methane vented from coal mines is captured and used.

Table C-17
Issue 2: Minerals and Mining

Comment ID	Comment
2281	The revised management plan needs to address how uranium mining will occur to ensure proper protections and prohibit leasing within the river corridors. BLM must ensure that all state and federal laws are applied to any permitted mines. The BLM must also ensure that a viable long-term plan for dealing with any radioactive or contaminated materials as well as any other waste products is securely in place.
2282	All permitted mines must: Prove that there will be no harm to both surface and ground water quality and quantity
2283	All permitted mines must: Prove that the long-term ecological health of the area will not be jeopardized;
2284	All permitted mines must: Have viable restoration plans in place before permits can be granted;
2285	All permitted mines must: Have an adequate bonding mechanism in place sufficient enough to cover the entire cost of restoration.
2505	Thank you for the opportunity to comment on the Uncompahgre RMP revision. No off-road vehicle use, fossil fuel drilling, or mining should be allowed. Protect the land's biological integrity.
2510	Mining activities should be carefully restricted in order to prevent damage.
2511	Better yet, ban all mining that destroys our America's natural wonders.
2519	The RMP should impose strict limits on uranium and other mining to protect our land, air and water from the toxic as well as unsightly byproducts of mining.
2544	Enough of the permanent damage wrought by mining and other extractive industries. Let's keep this breathtaking spot safe from the profit motive. Our children's children will thank us if you have the courage to act as responsible stewards, as you should.
2551	Please tell me that you did learn from history. Remember the silver and gold mining in the past and what it did to the waterways with arsenic contamination.
2559	The Uncompahgre RMP revision should, in my opinion, include: 3. Limit resource extraction
2569	I expect that, consistent with the above, the Bureau may identify areas within the Plateau that are suitable for energy and mineral development. Any such development should be limited to those areas, and the RMP should identify state-of-the-art regulatory requirements to ensure minimal direct and indirect adverse impacts to land, air, and water media.
2572	I want MORE quiet wild lands, NOT less, and NO mining of any kind. This land belongs to WE the PEOPLE, NOT greedy developers, who rape our lands for their own greedy PROFIT!
2657	Mining of all sorts should be carefully limited and renewable energy sources should be encouraged.
2659	Thanks for taking comments on the Uncompahgre RMP revision. When I first explored this area nearly 25 years ago I fell in love with it and was simultaneously dismayed by the obvious signs of resource extractions of all sorts. The effects of such extractions don't stay put neatly onsite, as you know.
2669	Mining and off road vehicles will only contaminate its waters and do untold damage to the environment
2702	Please keep extractive industries out as much as possible so as not to eliminate the publics choice in the matter in the future
2711	Another issue in this area is uranium mining, which has the potential to seriously impair the most basic of our natural resources such as air and water. Thousands of residents of southwest Colorado are hoping that such uranium development is not the continuation of unchecked energy expansion, which has cost Colorado over $1 billion in clean-up so far.
2834	Uranium The history of uranium mining and milling in the United States (and indeed, around the globe) is replete with environmental damage, serious worker safety and health abuses, and harm to entire communities. Many remote and unique landscapes continue to suffer the effects of an industry characterized by several years of speculation-driven booms followed by decades-long periods of inactivity. The affected communities have been both low income and in great measure comprised of rural and indigenous populations, representative of an all too common pattern of environmental injustice. Additionally, most of the environmentally damaged sites have not received adequate stabilization, let alone cleanup of past harms. Where cleanup and decontamination of the radioactive and toxic effects has been carried out, most of the cost has been borne by taxpayers rather than the owners of the largely Canadian-based companies who are engaged in the uranium mining and milling

Table C-17
Issue 2: Minerals and Mining

Comment ID	Comment
	industry, including Energy Fuels Inc, the Canadian based company proposing the Pinon Ridge Uranium Mill in the Paradox Valley. The RMP and NEPA analysis provides the opportunity and the duty for BLM to inventory these un-reclaimed mines and contaminated lands and to present the direct, indirect, and cumulative impacts of uranium mining, along with a robust set of alternative courses of action and mitigation measures which will guide the BLM in its ongoing attempts to handle abandoned mines in the Uncompahgre Field Office, while simultaneously attempting to consider and approve the industry's attempts to open new mines. The boom and bust of the uranium mining industry in the Uravan Mineral Belt has left un-reclaimed, abandoned and mining operations "temporarily on hold" waiting for the next boom. Many of these operations are using these sites as long-term storage for uranium ore, resulting in unnecessary and undue degradation of the land, air, water, and wildlife on which multiple uses of these lands depend. In addition to imposing strict standards for the handling and stockpiling of ore, wasterock, and overburden during actual mining operations, the RMP should impose an outright ban on the ongoing practice of using mine pads for the long-term storage of uranium ore. The BLM should acknowledge in the RMP that it has the authority to deny mining claims altogether to comply with FLPMA's requirement that, [i]n managing the public lands the Secretary [of the Interior] shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands." 43 U.S.C. § 1732(b). The requirement to avoid unnecessary or undue degradation is the "heart of FLPMA [and] amends and supersedes the Mining Law." Mineral Policy Center, 292 F. Supp. 2d 30, 33 (D.D.C. 2003). Congress explicitly recognized that this requirement would "impair the rights of any locators or claims under the Act, including, but not limited to, rights of ingress and egress." 43 U.S.C. § 1732(b). Specifically concerning the Department of Energy Lease Program in the UFO the RMP should recognize that the BLM continues to have management authority over the lease tracts. The RMP must make management decisions in accordance with the public land laws, all of which still apply on uranium lease tracts co-managed by the BLM and DOE. Our review finds no applicable NEPA analysis of the BLM's past decisions or the BLM management duties as they apply to the ongoing activities on these lease tracts. Because of the unique and significant impacts posed by each of the uranium mines in the Uncompahgre Field Office, the RMP must include specific commitment that, for any proposed uranium mining projects, the BLM will evaluate all necessary, site-specific information within the requirements of an EIS. The process and analyses required in an EIS is necessary to protect the environment and public health, ensure that any recovery minimizes and mitigates negative impacts to sensitive resources like wilderness quality lands, clean air and water, wildlife habitat, cultural resources, and recreation opportunities. No federal agency has prepared a NEPA-compliant analysis of the cumulative impacts past, present, and future - of the uranium mining and milling activity in the Uncompahgre Field Office, which includes the Uravan Mineral Belt and the area shown by the map published by Energy Fuels to demonstrate the geographic scope of the uranium mining and milling activities in the Uncompahgre region. Such a cumulative impacts analysis should at a minimum include the cumulative impacts of uranium mining and milling on the quantity and quality of regional groundwater supplies, the cumulative impacts on regional airsheds, and the cumulative impacts on regional surface water supplies. Impacts to wildlife, and necessary restrictions and mitigation measures must be considered, especially the impacts to threatened and endangered species, sensitive species, and bats, which are attracted to mine sites. Additionally, in the RMP, the BLM should evaluate and identify practices that can be required to minimize the impacts on the other natural resources of the planning area by limiting water use and surface disturbances. Last, because circumstance may arise at the site-specific level where the impacts cannot be adequately mitigated, the RMP must recognize that field offices must consider a "no action alternative" and may choose to deny a mining or exploration request in such situations. Recommendation: BLM should protect areas from uranium mining where appropriate, thoroughly analyze the cumulative impacts of any proposed uranium.

Table C-18
Issue 2: Renewable Energy Development

Comment ID	Comment
343	Geothermal and solar power generation need close examination and strict rules before being allowed. Similar to O&G development this form of energy development should be strictly controlled in areas of outstanding scenic, natural or recreation value. Similar "no surface occupancy" and other stipulations should be developed for these energy activities.
885	We live completely off the grid with a solar electric system, and a solar thermal system that provides all our domestic hot water and some heat. My husband, Kerry Kalarney is an expert in this field, please refer to his comments. My knowledge of large-scale renewable is convincing enough to me that there is less impact on the environment than extraction of resources.
1346	Potential social and economic benefits and impacts from renewable energy development abound, however, it should be noted that a determining factor for the siting of renewable energy resources is the proximity and distance to roads and transmission lines. Utility transmission lines and associated facilities require access, which is fundamentally tied into renewable energy development. Tri-State requests that utility considerations continue to be incorporated in the decision-making process as a fundamental public health and safety requirement, partner in environmental stewardship, and a critical component of renewable energy development.
1770	BLM should designate zones for renewable energy development in the RMP, and limit renewable energy projects to those zones.
2286	Although we support the development of a strong renewable energy sector, we caution that large-scale alternative energy development projects, such as wind farms, solar arrays, or geothermal plants can cause the same types of harm to natural ecosystems as gas and other traditional energy projects. Therefore any proposed alternative energy projects should receive the same scrutiny and restrictions that we advocate for gas development herein.
2459	This land should also be protected from the encroachment of windmill power generation farms as they are no more than industrial development.
2488	Under the resource protection option of the RMP, if BLM should designate zones for renewable energy development in the RMP, and limit renewable energy projects to those zones, that is the most acceptable to me, in the absence of complete habitat restoration
2501	RENEWABLE ENERGY IS AT THE HEART OF AMERICA'S ENVIRONMENTAL PROTECTION DUTIES. MUCH BETTER THAN COAL, OTHER MINING, AND OIL EXPLOITATION OF OUR WILDLANDS
2560	The Uncompahgre RMP revision should, in my opinion, include: 4. Allow renewable energy activities but within boundaries.
2640	There have been and will always continue to be increasing demands on our wild resources. To simply give in and open up more and more of these areas to development at the expense of clean water, clean air, and natural areas is to continue to strangle our very existence. We must shift our attention to ALTERNATIVES, ALTERNATIVES, ALTERNATIVES. Not after we have exhausted our resources and destroyed our planet but NOW!!
2658	Mining of all sorts should be carefully limited and renewable energy sources should be encouraged.
2672	If you can stop all oil and gas development for the medium term we can scale up renewable and non-destructive forms of energy and save this unique region form the hideous destruction that always accompanies extractive industry
2836	Renewable Energy -The RMP should identify zones for renewable energy projects and limit all renewable energy development to those zones. Zones should be based on high-resource, low-conflict areas that are on already-degraded lands and near existing infrastructure. The BLM is already taking a similar approach in the ongoing Programmatic Environmental Impact Statement for Solar Energy Development and this RMP should designate zones for all types of renewable energy and then limit development to those zones. In addition, within the zones, BLM should prioritize lands that are most suitable for development, ensure adequate protective measures are imposed on development, and require both onsite and off-site mitigation of impacts to resources, as well as loss of uses (such as recreation). For off-site mitigation, we also direct BLM's attention to IM 2008-204, which describes the broad type of actions that may be taken to address both direct impacts of a project and greater cumulative effects that development is having on a landscape. IM 2008-204 identifies and elaborates on the types of offsite mitigation that can be used, stating: • Offsite mitigation may include, as appropriate: - In-kind: Replacement or substitution of resources that are of the same type and kind as those being impacted. --

Table C-18
Issue 2: Renewable Energy Development

Comment ID	Comment
	Example: For every acre of new, long-term surface disturbance in important sage-grouse nesting/early brood-rearing habitat in Area (A), (X) acres of unsuitable habitat in Area (B) is reclaimed, treated, or planted to create new or suitable nesting/early brood-rearing sage-grouse habitat. - Out-of-kind: Replacement or substitute resources that, while related, are of equal or greater overall value to public lands. -- Example: For every acre of new, long-term surface disturbance in important sage-grouse nesting/early brood-rearing habitat in Area (A), the project proponent agrees to bury (V) miles of existing power lines and remove the power poles used as hunting perches by raptors in Area (B). - In-lieu-fee: Payment of funds to the BLM or a natural resource management agency, foundation, or other appropriate organization for performance of mitigation that addresses impacts of a project. -- Example: The applicant may make payment to the BLM or a conservation group based on the amount of acres that will be disturbed in exchange for commitment from the recipient to apply the funds toward local sage-grouse core habitat protection/restoration projects. In the context of renewable energy development, there may be additional conservation priorities that can be pursued to mitigate the impacts of individual projects and BLM could being discussions with interested stakeholders to identify these potential targets for off-site mitigation efforts or funding. Recommendations: The Uncompahgre RMP should identify zones for all types of renewable energy development that prioritize high potential for energy development areas that contain degraded lands and are in close proximity to new transmission, while excluding sensitive conservation lands, such as citizen-proposed wilderness areas and ACECs. The RMP should also specifically preclude development outside the designated zones. Within the zones, the RMP should also set out prioritization criteria, which direct development to degraded lands and identifies other areas where development is more likely to lead to conflict, as well as setting out protective stipulations to safeguard other resources. We have provided a proposed "Sensitivity Based Prioritization for Development Areas Within Renewable Energy Zones" (attached to these comments) to be used by the Uncompahgre Field Office in implementing these recommendations. For off-site mitigation, BLM should provide for addressing a wide range of options to address the cumulative, far-reaching impact of renewable energy development (as set out in IM 2008-204) and should design a process to reach out to stakeholders and develop a set of conservation priorities to target in connection with off-site mitigation.

Table C-19
Issue 3: Recreation Management

Comment ID	Comment
2807	Recreation and Special Recreation Management Areas Using the language of Benefits Based Management, which emphasizes user "experience" rather than recreation "activity" or "resources," we would like to identify ourselves as representing a range of Quiet Use organizations whose hundreds of thousands of members are passionate about preserving traditional forms of recreation such as hiking, backpacking, non-motorized hunting, angling, horseback riding, and birdwatching. 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 BLMs 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.
2808	Preservation, creation and enhancement of opportunities for quiet recreation. The recreation resource on public lands is becoming increasingly 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 Uncompahgre Resource Area can provide a wealth of these types of experiences, encompassing many natural and scenic landscapes. The RMP should accommodate those desires as they are consistent with BLM Colorado's strategy for recreation management and the national BLM publication "Priorities & Goals for Recreation & Visitor Services."
2809	FLPMA and Off-Road Vehicle (ORV) Regulations Applicable to Noise: 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 recreational experience have become a looming issue in today's noisy urban world. A recent study by the National Park Service showed that 91% of park visitors consider enjoyment of natural quiet and the sounds of nature as compelling reasons for visiting National Parks (McDonald, Baumgartner, and khan 1995). We recommend the UFO conduct a soundscape analysis to guide formulation of intended user experiences, for example by analyzing how canyon topography and vegetation might reflect 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. We have included a more detailed discussion on soundscape management later in these comments. 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.
105	NOLS is a SRP holder for rock climbing in the Uncompahgre RA. One of our primary concerns is continued access to climbing areas, specifically Paradox Valley, Unaweep Canyon, and Escalante Canyon.
115	Trails in the Ridgway area for Hiking and Biking.
140	TMW commends the effort of the BLM to encourage public participation during the revising of the RMP. The

Table C-19
Issue 3: Recreation Management

Comment ID	Comment
	opportunity for public input is appreciated giving us input into the planning process. While we find the Mesa State College community-based focus group meetings that are designed to better understand the public's desires for recreational planning are no doubt fruitful, we do however feel that individual meetings with the various user groups would be more beneficial in the planning process where you could hear first hand on the specific user groups concerns.
148	Motorized recreation is the fastest growing type. of recreational activity in the country and WOHVA appreciates the stress that this growth is putting on the roads and trails in all of our National Forests. WOHVA encourages all OHV enthusiasts to recreate responsibly and enjoy the great outdoors. This increase in use has put additional congestion on already crowded roads and trails.
149	With this additional and growing demand for motorized recreational opportunities, WOHVA does not support any Forest Plan which does not list as an alternative the expansion of motorized recreational riding opportunities.
150	WOHVA encourages the Forest Service to work with motorized recreational groups to develop a partnership with these groups. It is our belief that by working with motorized recreational volunteer groups the Forest Service can find solutions to some of their financial and budgetary restrictions.
151	The geographic scope of the RMP in the recreation section must include many recreation opportunities not located in the FO. For example: Those wishing a non motorized experience have many opportunities within a short distance from the towns and villages near the BLM lands. Black Canyon of the Gunnison National Monument, The Gunnison Gorge NCA, Dominguez Escalante NCA and Wilderness, McInnis Canyons Wilderness, and the numerous Wilderness areas in the neighboring National Forests. All existing, previously designated recreation zones for each type of experience must be taken into account during the analysis
153	We feel that the team must look at the recreation portion of the plan with a scope of all of western Colorado. The Uncompahgre FO surely is a regional recreation resource.
154	A well executed EIS must rely on a complete and accurate inventory of recreation opportunities and routes. A through description of the activities and the benefits to the participants and the community is essential for a meaningful analysis. Real visitor numbers of participants in the activities and the seasons of use are essential data needed to make statistically relevant decisions and determine the scale of effects by alternative.
155	An accurate representation of the current management situation is essential. The scale of effects can only be analyzed if an accurate no action alternative is presented.
157	We suggest that due to the seasonal availability of land within the FO boundaries and the broad spectrum of recreational activities combined with the low visitor counts: the segregation of visitors and the zoning of activities is not an appropriate scheme for recreation management in the FO. Rather the FO can rely on the good sense of the public to decide which locations and seasons are best suited to their chosen activity.
159	Of particular interest to us is the southwestern portion of the FO. Beginning at Blue Mesa and continuing southwest to the intersection of highways 141 and 145.and east to the Utah border. The area north of 141 is open to cross country travel. It contains many miles of low-grade roads that are very high value recreation resources to our members. Similarly, the area south of 141 has many miles of high value recreation roads as well as beautiful slick rock formations. We hope to continue to be able to access these routes and slick rock formations that are important for scenic value and high skill riding opportunity. We recommend that these areas be managed as dispersed recreation areas with an emphasis on motorized recreation.
160	The Dry Creek area just west of Montrose works well as an urban interface multiple use recreation area. We hope it will retain the present character.
171	This discriminatory segregation of historically shared multiple use routes is my main concern. I request the RMP planning team to be cautious of influence from the anti-multiple use community towards protecting/outlawing said routes from their historical uses.
172	The non-mechanized public land visitors have multiple choices of recreation opportunities within a short distance from the towns and villages near these BLM lands. These lands have been set aside specifically for these visitors.
174	I also believe the multiple use designation of public lands within the UFO is a huge asset towards current and future economies of the surrounding communities. Lots of businesses rely on multiple use access granted

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	towards these lands.
181	Regarding recreation, it seems that there are user conflicts between motorized recreation and non-motorized recreation. I enjoy hiking, fishing and hunting on public lands, if I am hiking on a motorized trail, I take this into consideration and expect to encounter motorized vehicles, this does not bother me, if it did bother me, I would simply hike on a non-motorized trail.
182	On several occasions we have come upon hikers and horseback riders who have scowled and cast unpleasant looks our way and refused to return our friendly wave. All I can say is I hope these hikers or horse owners never become old or ill because if/when they do, the might find themselves on a dreaded ATV, getting nasty glares from a new generation of hiker or horseback rider. For these reasons I would encourage the BLM to increase motorized opportunities and clearly mark trails as either open or closed to motorized travel. During my many hikes I have NEVER seen a motorized vehicle on a non-motorized trail. Motorized recreation is a legitimate use of public lands, just as horseback riding and hiking are.
185	I would like to see more land developed and opened for recreation of all forms.
189	It seems more and more areas are either closed or the size reduced, which concentrates all users into smaller and smaller areas where conflict is more likely to arise. If we have more land open to recreation, then we will have fewer conflicts.
195	Today's kids are glued to electronic gadgets and spend most of their time on a couch and will never get an appreciation for the outdoors if all the land is locked up and the only way for them to enjoy being outside is to go for a hike. Today's youth need places to ride mountain bikes, motorcycles and ATVs, however, I do believe we need to increase peoples awareness about proper trail etiquette. We need more education about trail maintenance and teach people to stay on the trails and not tear up the land by irresponsible use. I believe most people that do ride off trail or enter sensitive wetlands do so not out of disrespect for the land but out of ignorance, not even realizing the consequences of their actions, to curb this we need better education regarding responsible land use. Thank you for allowing me to comment.
196	I'm concerned with the lack of active management of the "forgotten lands" directly east and southeast of Montrose (Unit 3). These areas are close to town, and have a lot of potential for convenient recreational opportunities like hiking/biking trails. Unfortunately these lands are unmanaged-there is little signage, no formal trailheads, few apparent BLM patrols, etc. Trash dumping and numerous use trails detract from the quality of these lands.
198	The BLM should reconsider the tracts near the City of Montrose identified for disposal (Unit 3). These tracts should be kept under public ownership, and used for open space and non-motorized recreation.
202	This would be a great place for singletrack hiking/biking trails that could connect all the way east to Shinn Park and south to Buckhorn Rd. (Unit 3)
204	In general, non-motorized travel near the City of Montrose should be encouraged (Unit 3). Non motorized travel near populated areas is more compatible than the nuisances associated with motorized travel (noise, dust, and fumes).
205	I would like to see increased visitation and use of areas near Montrose (Unit 3) by users who follow the rules and respect the land. Increasing carefully managed recreational opportunities near the City of Montrose will have economic benefits. Compared to other towns Montrose has few "backyard" outdoor recreational opportunities. Managing lands near town for recreation will encourage people to visit Montrose and stay a few days instead of just picking up supplies.
211	Secondly the BLM needs to provide access for ATV and motor sports to the citizens.
212	These are public lands so individuals should have access but organized groups need to be monitored. This would include commercial, and other organized groups even if it is something as simple as a boy scout group.
216	We don't think of ourselves as mechanized users either. We are self-propelled, quiet users who want challenging and beautiful terrain that single track trails provide. Non-motorized trails are also more environmentally sustainable, as they are more congruent with terrain, rather than going straight up or straight down steep slopes. Our trails don't get rutted, bermed, and over-widened by heavy and motorized vehicles.
221	Single track naturally limits the number of users. I don't think you need to limit the size of groups. No one wants to get flat tires, so mountain bikers will stay on the trails. We also don't want to ride in the mud, so when

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	resource degradation can occur due to wet trails, we naturally stay off of them.
222	Our area has the potential, given the amount of BLM land and the type of terrain within that land, to have the quality of excellent mountain biking that is found in Grand Junction. That area has become a destination site for mountain bikers, just like Moab. The UFO Planning Area has great potential for single track trails throughout the area, but the trails will need to be protected, signed, and promoted. We need to offer self-propelled recreational opportunities to our region to not only promote this quiet use of public land but also to encourage the health and fitness of our population.
252	Recreation- Decisions regarding recreation on public lands may affect Reclamation lands and resources, and could affect public safety. BLM should work cooperatively with Reclamation and its managing entities regarding recreation in close proximity to Reclamation lands and facilities. Areas of particular concern, though not necessarily limited to those listed, include: • Areas adjacent to active Reclamation facilities and Reclamation/BLM boundaries adjacent to our active projects.
286	The remoteness and isolation of the area are part of its appeal, and ensuring that access remains challenging will do a great deal to preserve this appeal and the self-reliant atmosphere of the area.
287	I would like to express my opinion regarding ERMA designated land. I don't wish to see more areas that are managed as dispersed use areas changed to SRMA designation. I am in favor of WSA lands becoming wilderness, but dispersed use areas which allow dispersed camping are important to me. Please resist the urge to improve facilities, access, etc. and manage every recreational experience on every piece of BLM land.
291	I am an avid outdoor enthusiast and would like to see the Jumbo Mountain area become more of a user-friendly area for visitors, mountain bikers, hikers, runners and local people walking with their families. I understand that this area has numerous uses and I think that we can manage the area to make everyone happy. A majority of the uses conflict with motor sports and loaded weapons and I think it would be nice if the BLM's assessment/plan reflected this for the safety and enjoyment of everyone.
292	After doing some local research, it appears that the main users in the area are mountain bikers. It makes sense to me that the trails that are already established as singletrack should stay that way. It would be great to have signage and trail specific info that separates the various uses. It would be great to see non-motorized signs on the singletrack trails. The local biking group is interested in managing the area with clean up and trail maintenance days. The mountain bikers are also very helpful when it comes to putting out fires. The fire dept. even uses the singletrack trails to get to the fires!
293	The current accesses do not really encourage motor sports and I would like to see the accesses stay that way.
294	If the current ATV trails stay marked for that specific use, I think all groups using the area will be happy. Hunters use the area in the fall and I think that communication between the hunters and bikers would be easy to facilitate which can create a compromise that all sides can agree on.
295	The main thing is that all groups get represented and have as much use of our public lands as possible with respect for the differing uses amongst us. In my opinion, we can all accommodate each other and I hope that all of the uses get their proper attention creating a peaceful, many use area that works for everybody.
301	I am writing to encourage the BLM to strongly consider creating a SRMA for the BLM lands adjacent to the Town of Paonia on Jumbo Mtn. This area is has a long historical usage as a recreation area by hikers, runners, hunters, ATV riders and since 2000 by mountain bikers. Its proximity to town make it an ideal recreational area for all these groups. However there are many issues that need to be addressed to avoid resource damage, user conflicts, access issues. Many folks in our community are ready to work with the BLM to make this happen.
302	I would also like to express to you the need for very thorough permitting and oversight of all gas and oil drilling and mining activities. These activities should be permitted in nonrecreational areas only. They should also be permitted only with absolute assurance and proof from the private companies that surface or subsurface waters will not be contaminated and that all surface damage will be fully restored.
306	I urge the plan to protect large undisturbed tracts of land for the quiet activities, I do often such as hiking, backpacking, photography and fishing.
307	My photography focuses on wild landscapes and wildlife. It is crucial that substantial habitat is maintained for our photogenic wildlife species such as the large big game deer, elk, mountain lions as well as the many birds of our area including the sage grouse to have free migration and grazing routes as well as breeding grounds.

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308	I urge you to prioritize these type of uses over the intrusive motorized uses. ATV and snowmobile access should be restricted to existing routes in non-sensitive areas so that significant tracts can be preserved for quiet, solitude and the protection of our wildlife.
309	I am particularly concerned about the areas near the Dominquez canyon wilderness area, the Norwood canyon area including the San Miguel and the Dolores River Canyon both because of their importance to me as places to photograph and for the two rivers because I am a fly fisherman.
321	issues/concerns? ATV access, snowmobiling, hunting & fishing, camping
409	I have great concerns about the government regulating and managing of our recreational and public lands. We as tax paying citizens of this great country know that all this management plan is no more than a government expansion and control over the private sector just more regulations and rules to limit our recreational use of our lands.
415	As far as management changes are to start working with claims holders, fishermen and all kinds of recreation list's on access to the rivers and streams of our public land.
417	I personally think the regulation on camping time on our BLM and Forest Service lands should be changed from 14 days to 30 days.
418	There should be no restrictions on the size of the groups that are using the resources for recreation.
429	My primary public land uses are hiking, mountainbiking, motorcycle/OHV, and camping. In order of use of BLM land I use the Hotchkiss dobies, Jumbo Mountain trail system, North Delta OHV area, and Paonia/Crawford dobies primarily.
430	I did not realize that the deadline for comments was already here so the opinions expressed are my own but I will try to have the rec district board create an official position of cooperation at the next meeting. As we recently did a survey for our own Master Plan that some what surprisingly found BLM/public lands as the primary place that our residents recreate. The residents overwhelmingly wanted us to develop trails as the top priority. The rec district owns aprx. 160 acres at our Cross Roads Park which is adjacent to BLM-Hotchkiss Dobies.
433	For clarity I will try to comment on each area concisely below. Hotchkiss dobies- Superb close motorcycle, ATV, and OHV area. Could use a designated shooting "range" to reduce danger to other users. Little or no value for bicycles due to soft dirt and steep hills. The large numbers of trails / open riding = big family fun. Simply regarding the most used trails every 3-5 years would keep them from getting ever wider as people try to avoid big bumps. Might be nice to have a couple of single track only trails.
434	Jumbo trails- The best mountain bike trail system in the region. A true gem. Great for hiking also. The powerline road(really the whole area)is good for OHV use but I don't ride my motorcycle there for fear of hitting a cyclist. I support this being a non-open riding area if a good trails plan was in place. I would support trails development in this area though. Live stock does the most trail damage in this area.
435	North Delta OHV World class motorcycle/OHV area. I've met people from Denver who come there with 20+ people and have been coming for 22 years. The power lines are a major scenery bummer but the dobies are probably the best place for them. Once again the freedom of open riding is a rare experience, although 99% of the time I'm on an existing trail. The parking area could use gravel. The big bumps need fixed every 3-5 years. I don't totally understand the point of The Adobe Badlands study area but it blocks a number of the best loop trails.
436	Paonia/Crawford dobies- Good multi use area. It would be nice if the powerline road could more easily connect with the Crawford Youngs Peak area. Would also be great if there was a connection to the Hotchkiss dobies, which on a map of BLM lands seems almost possible.
440	In an over all way, our experience tells us that separating different uses by creating different access points for different activities is needed.
441	We feel that motorized activities should not be allowed near town because of concerns for pedestrian, bike and horse rider safety as well as noise considerations for the near by homes. We would recommend that motorized vehicle access and hunting only be allowed at a much further distance away from town. Such as near Minnesota Reservoir where there are existing roads and the oak brush will discourage vehicles from driving across the landscape.

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442	Also, because of terrain, it is less likely that hunters will make there way toward town. There is a "power line road" that is near town. ATVs and other vehicles use this access, which is across private property, and is too close to town for safe hunting. Access to motorized vehicles at this point should be stopped.
443	Safe hunting is a growing concern. There have been some rather close calls here recently. I have encouraged those involved to write to you directly. When people look at a map, they can see that a public road comes right up to the BLM, so they head out there not realizing that they cannot drive onto BLM. They get up-set and we look bad for limiting their access.
446	The public needs more access and better access.
447	There needs to be different access for different activities.
474	Every effort should be made to keep areas managed as Extensive Recreation Management Areas allowing users the freedom to use the land with good judgment and common sense.
483	The number of users should not be affected by energy and mineral development. The number of users should never be restricted by a Wilderness designation.
494	Ranching, placer mining, uranium mining, wildlife developments, recreation are among some of the areas for growth.
507	Drainages north of Tabeguache Creek SMA including Shavano, Campbell, Spring Creek and Burro Creek should be managed as non motorized and non mechanized. Additionally, the management of Tabeguache SMA itself should continue to exclude all mechanized vehicles from within its boundaries. These lands in their totality, combined with the large adjacent Forest Service roadless area, would create a large expanse of intact wildlife habitat. This would provide protection to big game in Management Unit 61, one of Colorado's most prized hunting areas.
511	Dispersed camping should be limited to established campgrounds as well as adjacent to established roadways no more than one vehicle length .
512	Off road game retrieval should be prohibited by OHVs
513	Shed antler collection should be by permit, allowed by foot only off road, and prohibited in the spring months when big game are at their weakest and least able to deal with the stress associated with antler harvest techniques.
514	Regarding recreation permits for competitive events. Events such as extreme Jeep crawls which occur in the Dry Creek area should be managed to have low impact or be disallowed. Permits without the ability for follow-up monitoring and enforcement should not be issued.
532	There are legions of scientific studies that demonstrate the adverse effects of human activities on big game. As one example, exhaustive studies have been conducted on the US Forest Service's Sharkey Experimental Forest and Range in Oregon that clearly demonstrate the impact of various human activities on elk and mule deer. Spanning 40 square miles of prime elk habitat in the Blue Mountains of Oregon, Starkey has enabled ecologists to study wildlife and range on a landscape scale for the past 20 years. During the Starkey project, Michael Wisdom (2002-2004) researched the effects of ATV's, mountain bikes, horses, and hikers on collared elk. The results of the study were telling. Elk ran faster and farther when encountering humans on ATV's or mountain bikes than on horses or afoot. And the elk stayed gone. The study also showed that elk kept on the move even when ATV's or mountain bikes had left. The results of the other studies are very similar. The experiences I and other public land and wildlife managers have had in our careers further support the findings of these studies. It is clear that motorized vehicles affect big game populations, security, distribution, and reduce habitat effectiveness. The BLM needs to utilize this science and the experience of professionals in making travel management decisions.
560	The primary activity I engage in on BLM lands is hiking, both on-trail and off trail. I hike, in part for exercise for myself and my dog, and to experience new areas. Observing wildlife, flowers and trees, geology, various land forms, and nature in its undisturbed state are a great attraction for me. Perhaps more important is the opportunity to have a solitary, quiet use experience; a spiritual change of pace. These are the things I value most while visiting public lands.
561	We are property owners east of Paonia with 40 acres and BLM access to the Jumbo Mtn area. This access is private and as you know the Jumbo BLM area has very few public access points. It is bisected by the power line

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	road but both ends are on private property. We have lived at this location for 27 years and have seen usage of BLM change from rarely seeing anyone back there to multiple use by - in order of highest number of users - Mountain Bikers, Hikers, Runners, Horses, Hunters, ATV's and Motorcycles. During the year I'm back there @ 5 times per week from late March thru Nov so I see a lot of users. The system of single track trails has become very special to us and we would like to see certain trails remain single path only with no motor vehicles. The vast majority of BLM users back there are Mtn bikers and hikers with the few ATV's and motorcycles generally staying on the power line road and "The Ridge Of Doom".
577	Non motorized quiet use of these areas is preferred. 1.small parcel of land on the east side of Highway 550 and north of Cutler Creek. My kids have both used this area for rock climbing and it is quite unique geologically.
578	parcel across Highway 550 from the State Park. It is already being used for mountain biking and as a councilman in Ridgway I know that it brings many recreationists. There is a slight problem with Bike/ Horse encounters but that can be worked out with proper signage.
579	McKenzie Butte.
580	Chaffee Creek drainage.
584	I live in the Gunnison Gorge NCA Planning area. My interests are mainly recreational. I would like to see existing routes for equestrians, hikers, campers, sight-seers and Nordic skiers maintained.
585	The improvements made in the Peach Valley area of the Gunnison Gorge NCA Planning Area are wonderful – specifically the updated maps, trail markers, picnic & sanitary facilities. I would like to see this done in the Uncompahgre Planning area. There may be specific areas that are more appropriate for certain activities and SRMAs should be considered in those areas to encourage the right kinds of activities in the right places.
586	Ecologically or wildlife sensitive areas may not be appropriate for motorized vehicles or target shooting.
595	Formal sights for viewing rock art, fossil exposures, etc. should be developed in order to enhance public involvement and sight-seeing.
605	Recreation in the wildland-urban interface areas should be allowed, but perhaps access to BLM land should be restricted or channeled to less environmentally sensitive, healthier land areas.
608	I agree that there need to be places of recreation for people to ride motorized vehicles and mountain bikes, etc. But many such places already exist. It is my opinion that we need more places where humanity can experience the beauty of nature without the noise of the modern world.
612	Recreation around Norwood Colorado is increasing very quickly. I think that when the U.S. census comes out you will find that there has been a demographic shift in the population. It has become much younger and what they do for recreation has changed somewhat in the last ten years, this population trend should be a consideration to help guide the overall vision of the RMP. Both winter and summer recreation is extensive and growing. As for the rivers they are very special attributes to the area and draw traffic through the area on the West End of San Miguel and Montrose Counties. Change is inevitable but should be managed. Do you have specific data on recreational uses along each river systems i.e. trends, types, and quantities of uses? Do they include rafting, kayaking, hiking, mt. biking, rock climbing, motorized use, swimming, camping, or fishing? These are the uses I see everytime I go out to the rivers.
613	I personally want to see the RMP area on the West End stay a more recreational destination. Any opportunities that would expand this recreational character would be beneficial to the local towns.
617	Hunting should be limited to the area east of the powerline road to keep it a safe distance from houses.
622	Disallowing the use of roads, grazing land, mineral and energy development, as well as recreational use, would be a poor use of public land. The point of public land is that it belongs to the people. Public lands should be available to all people. The combination of grazing lands and mineral/energy exploitation allows business and employment growth for our county, and recreational use should also be encouraged, not restricted.
623	This letter is simply to provide input in favor of a nonmotorized designation for the singletrack trails located on jumbo mountain.
625	I moved to Ridgway because of the magnitude of opportunities for hiking, biking, skiing and enjoying the wildlife that still exists across these magnificent surrounding areas. Already in the short time that I have been here, three years, I have seen far less wildlife and more and more motorized vehicles. This would lead one to

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	conclude that the motorized vehicles need to have their specific areas of use, both summer and winter.
629	I wanted to respond to the comment period on Jumbo Ridge in Paonia. I am a home owner in the Pan American subdivision where there is access to the trails. It is such as asset to have hiking and biking trails so close to town. My husband and I go there regularly to enjoy the trails and I see many others from my community there as well. I would like to see the trail system preserved for the use of non motorized traffic. The hikers and mountain bikers seem to coexist well on the single-track.
632	On the point of hunting. I was surprised to even see hunters there. They should not be able to shoot guns that close to a subdivision. They are above us on a ridge, bullets can travel too close for comfort into our neighborhood and Hawks Haven. Please direct hunting further back from town. It seem ridiculous to me to see hunters that close to houses.
638	In addition, the Jumbo Mountain area outside of Paonia should be designated as a Special Recreation Management Area. All motorized and mechanized use should be on designated trails only. User-created trails should not be brought into the travel system—even on an interim basis— unless and until they have gone through site-specific NEPA planning. All unleased lands in the SRMA should be withdrawn from mineral entry, and BLM should impose additional conditions on any future wells permitted for the area on existing leases.
642	Regarding recreation, it seems that there are user conflicts between motorized recreation and nonmotorized recreation. I enjoy hiking, fishing and hunting on public lands, if I am hiking on a motorized trail, I take this into consideration and expect to encounter motorized vehicles, this does not bother me, if it did bother me, I would simply hike on a non-motorized trail. Recently my father became ill and can no longer hike or hunt like he used to so he purchased an ATV and truly enjoys getting outside on the ATV. On several occasions we have come upon hikers and horseback riders who have scowled and cast unpleasant looks our way and refused to return our friendly wave. All J can say is I hope these hikers or horse owners never become old or ill because if/when they do, they might find themselves on a dreaded ATV, getting nasty glares from a new generation of hiker or horseback rider. For these reasons I would encourage the BLM to increase motorized opportunities and clearly mark trails as either open or closed to motorized travel. During my many hikes I have NEVER seen a motorized vehicle on a non-motorized trail. Motorized recreation is a legitimate use of public lands, just as horseback riding and hiking are.
643	I would like to see more areas developed for recreation such as what the BLM has done at Peach Valley. This is a model of controlled recreation, proper signage is in place and this is a great resource to many families in our area. On any sunny weekend you'll find hikers, bicyclist, horseback riders, ATV riders and motorcycles all enjoying our public land in harmony. There are trails for all groups, great job BLM! I feel the Delta adobes could be developed in a similar way, people come from all over the state to enjoy these types of areas, it brings money to our area and promotes outdoor recreation.
645	I' would like to see more land developed and opened for recreation of all forms.
648	I would truly like for everyone to be more tolerant of other user groups, treat each other with respect and realize we all enjoy the same outdoors for the same reasons. This goes for both motorized users and non-motorized users. It seems more and more areas are either closed or the size reduced, which concentrates all users into smaller and smaller areas where conflict is more likely to arise. If we have more land open to recreation, then we will have fewer user conflicts.
652	Today's kids are glued to electronic gadgets and spend most of their time on a couch and will never get an appreciation for the outdoors if all the land is locked up and the only way for them to enjoy being outside is to go for a hike. Today's youth need places to ride mountain bikes, motorcycles and ATVs, however, I do believe we need to increase peoples awareness about proper trail etiquette.
702	The primary activity I engage in on BLM lands is hiking, both on-trail and off trail . I hike, in part. for exercise for myself and my dog. and to experience new areas. Observing wildlife, flowers and trees, geology, various land forms, and nature in its undisturbed state are a great attraction for me. Perhaps more important is the opportunity to have a solitary, quiet use experience; a spiritual change of pace. These are the things I value most while visiting public lands.
709	In spite of their significant growth in numbers , ATVs owners are still a relatively small percentage of recreational users on public lands (yet create most of the damage, and usually generate most of the complaints to BLM about being shut out). Their contribution to the economy of nearby communities is much smaller than quiet-use advocates (Just pick up a tourist promotion brochure from GJ, Delta, Montrose, Ridgeway, Norwood);

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	the emphasis is on encouraging, hiking, fishing, hunting, skiing, and other quiet use activities-I have never seen them promote ATV activities.
716	Proper use and stewardship of the land is vital to us all. Groups should be made to clean up after themselves.
721	Encourage responsible recreation ie leave no trace.
731	These lands belong to the people all of the people not just to the people who do not want the use of the land. The only restrictions would be for the people to not abuse the right to recreate on public lands.
737	Access to public land needs to be open to all taxpayers. Not just bureaucrats, the young and wealthy.
743	Public land should be used for the good of the public. Drill holes for coal mining, gas wells, logging should be allowed. Drill sites reclaimed, trees replanted. Grazing of cattle, sheep and the hunting of wild game encouraged.
745	Unlimited. Commercial enterprises should reclaim sites, replant trees, repair damage. The same for large groups.
754	We want to keep all our grazing rights, water rights, hunting rights and any other rights we were born with in this great country known as the "Land of the Free."
762	Maintaining access for BLM lands for hunting, recreation.
771	Permanent camp ground facilities be planned along the Paradox Trail at locations including Tabeguache Creek and Z-26 Rd North Fork Mesa Creek and P-12 Rd and at "Biscuit Rock" Area Hwy 141, North of the Hanging Flume site.
779	Manage mountain bikes as non-motorized users similar to hikers and equestrians as outlined in the 2002 BLM document "National Mountain Bike Strategy"
782	Ease the permitting requirements for field trip groups from our public schools on to public lands including local WSA and SMA.
784	Since this area sees a small about of users I see no immediate need for restrictions of the type or number of user groups. This could change if certain areas become very popular but I believe it will be many years, if ever, we see that occur. There are specific areas that have been popular for camping that could use permanent facilities as a way of resource protection that were outlined earlier.
786	As a stakeholder (COPMOBA, MWR, WESB) in our public lands here in the West End I want to expand the opportunities for locals and visitors to our area to use this great resource we call wilderness. Its unique characteristics, vast area and remote nature add up to a potential backcountry, wilderness experience that most people never have an opportunity to have. For economic development, this holds much promise for our small communities. I believe this kind of resource development (tourism) is compatible with the traditional ranching/mining/milling uses of this area. It's big enough for all of us to use and enjoy. If we all remain open to other's needs I think we can co-exist.
794	4-wheeler control during hunting seasons.
798	I have some concerns about multi use- the fact that people can hunt out there is very strange to me. I don't like hearing gunshots so close to our kids and pets and house. I have nothing against hunting at all, but why would you combine shooting guns with children and joggers and hikers on the same land?
799	I'm not a huge fan of the ATVs either. Again -I'm not against ATVs, but I don't like being around them when I'm hiking with my kids. And I don't like it when they crash into my neighbor's house by accident (which one did).
800	Dogs are fine. I don't care if there are dogs running around out there as long they are on a leash.
802	The ditch paths are so perfect for cross country skiing in the winter.
836	Quality of area for recreational hiking.
838	Try to limit gas engines on rivers, lakes.
839	Limit trail for motorized vehicles (off road)
845	(But for the fun of it, I would like to see users who tolerate multi-use rewarded with larger systems and networks of access and those
846	Kind of answered that above. Group size is a problem because a group of 50 will impact resources more than one from a time snapshot, but it is more a bout volume of use to an area, not PAOT

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864	A sign can also protect the health of the user, such as an area that has been sprayed, people then know to steer clear, and keep their pets away too. God help the wildlife in the area.
865	# of users in certain areas need limited, and time spent in an area, and sometimes this needs to change during certain times of the year. Someone needs to take a serious look at the impact of rifle hunting seasons on the Uncompahgre Plateau, the impact to all wildlife, roads/erosion, watersheds, spread of weeds, overall damage to the forest, new road closures that are affecting how this massive amount of people is moving during rifle seasons.
866	Behavior of users starts by teaching children in the classroom about public lands. We have to change the thinking of an entire generation of people
868	Target shooting should be done in very specific areas, not places that are way out from town, but closer in so they can be more easily monitored--trash kept up with, facilities, a watchful eye by a volunteer or staff, and hopefully less wildlife is disturbed. There is a target shooting area at the bottom of the "west transfer rd" at the county rock pile. Just below it is a dumping ground. At the rocks people leave all their trash, and targets along with spent shells. Another area like this exists on Hwy 90 in an off road parking area above the Shavano Valley. It to is littered. These are the only target shooting areas I know of. These two places give me the impression that target shooters don't care much about the land they are using to shoot on, therefore target practicing areas should require an access fee so someone can be paid to clean up after the shooters. Users could pay for a permit to use a specific area= It adheres to their vehicle or they carry it in their wallet. Or, they volunteer to care for the area by monitoring its use, picking up trash, maintenance. In exchange for their services, they get to use the area free of charge.
897	Permit large groups so that they can be monitored.
898	Discourage massive bike tours. They ruin it for the rest of us.
899	Snow mobiles are made too noisy.
907	I live, work and play in western Colorado next to coal mines. Where I hunt around mining and drilling there is more game where they have done seeding, roads, ponds, etc.
951	Our preferred form of recreation is hiking. What we care most about on Uncompahgre BLM lands is the quiet and undisturbed enjoyment of these lands. It is our hope that you intend to protect the backcountry silence and solitude, large blocks of undisturbed natural habitat together with the integrity of the ecosystems and wildlife habitat. We are confident that you will have as you highest priority these values over the high impact and damaging effects of motorized recreation, new road and motorized trail development together with extractive uses of uranium, coal mining and logging.
952	Regarding motorized recreation, we hope that you will restrict or close ORV use in sensitive habitat, sensitive watersheds, big game winter range, remote areas that cannot easily be enforced. We believe that we can count on you to protect these precious areas and experiences and resist the temptation to extend the use of the wilderness to ORV use.
953	Failure to address a proper permit allocation system on the San Miguel River.
954	Modification to current outfitter to permit system allowing new outfitters to participate in areas where management objectives are not being met by existing outfitters - non-use, use it or lose it.
955	Permit re-allocation implemented for rafting & fishing outfitters
956	Follow penalties for non-use issues regarding existing outfitters
957	Explore different "launch times" in order to spread out peak time use
958	increase access points and user groups in surrounding communities
959	Allow for regional outfitters with ability to run trips for localized visitors as opposed to non-regional outfitters which cannot serve the general public's goal of guided access.
962	Thirdly, I am concerned about additional trails for motorized vehicles in remote areas. ATVs and dirt bikes!!!! They are rampant, destructive, and their damage is irreparable. Their access needs to be severely limited.
963	I very much enjoy the outdoors, as does my entire family we use these public lands in some basic ways. We enjoy camping, boating, and snowmobiling and with these activities we have the whole year covered.

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968	An alarming increase in motorized use and an increase in the size and carrying capacities of OHV's and their ability to travel terrain regardless of conditions.
972	Increasing need to protect lands due to increasing drought and increasing demand and use by OHV's by restricting and limited OHV's and restricting and limiting livestock grazing.
990	I have lived near Montrose (about 8 miles south of your offices) for 11 years, and a major reason why I live here is to enjoy the natural, open and wild spaces that surround the more developed areas of the Uncompahgre Valley. While I understand that there are many different demands placed on our public lands, my personal use is largely in on- and off-trail hiking, photography and camping, and to a lesser extent mountain biking and exploring four-wheel drive roads.
999	Many uses can be compatible with preserving these systems if done carefully. Grazing, hunting and wildlife management should be done with more attention given to the health of the ecosystem than to the size of the "harvest."
1001	Camping and travel should be allowed in durable areas, and restricted in more fragile ones.
1002	Quiet uses like birdwatching, hiking, horseback riding, skiing, and photography can have minimal impact, but should be restricted if they are causing conditions to deteriorate.
1003	Trails and roads can be intrusive, or can funnel impacts away from vulnerable areas to less fragile areas. Maintain the roads and trails that help preserve the resource (including views), and close the others.
1004	I encourage the BLM to provide access to visitors which helps people appreciate the natural systems, and create adequate interpretive materials like brochures and signage to help people understand how to minimize their impacts and maximize their enjoyment and the enjoyment of others.
1049	It is irresponsible to designate hunting units as trophy hunt areas, while at the same time constructing facilities such as OHV parks that will increase pressure on the wildlife. Keep them separate.
1075	BLM needs to create an allocation and river use application process for organizations that provide river trip support to people with disabilities. These allocations and processes are available in Canyonlands National Park and Dinosaur National Park (this latter has an excellent model for allowing access for people with disabilities to river segments which require restrictions on public use to avoid overuse). BLM, as another division of the Department of Interior, should communicate with these parks for advice on special population allocations.
1181	It is very important to San Miguel County residents and government programs to be able to work with BLM to plan and hopefully build recreational trails. It is a long standing goal to connect San Miguel County to Ouray County and beyond via a trail for hiking and bicycling over Dallas Divide. Parts of the trail are in place on the San Miguel side. This trail would connect to the regional Galloping Goose Trail which connects Telluride and Lizard Head Pass.
1183	In addition, the Norwood Rec District is interested in developing a mtn biking trail system in an area near Naturita Creek west of Norwood. All of these trail concepts would depend on a partnership with BLM.
1188	We believe such designations support the economy of San Miguel County which depends largely on the natural beauty and natural values of the area for tourism and recreation-based business. The designations also support a culture of outdoor recreation and conservation awareness.
1193	The Town recognizes that some motorized use in this particular area is occurring even though there is signage that purports to restrict it. The Town feels that motorized uses should be limited in a manner that ensures good stewardship of the land and compatibility of these numerous and at times competing uses. This may require possible evaluation under a Special Recreation Management Area designation. We encourage good partnerships and collaborative planning to foster these outcomes.
1315	General ATV use should be considered and the safety of the traveling public and the Ranch should be considered.
1316	As the BLM knows, between 2000 to 3000 canoes, boats and other water craft use the Gunnison River [correction noted from follow-up letter to replace Uncompahgre River by Gunnison River] recreation. The Uncompahgre RMP should specifically discuss this use, including the location of where these recreationists can access the River. Currently much of this access includes the railroad right-of way across from the Escalante Ranch property. That location poses a danger to the recreating public and causes a use of the right-of-way that

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	is not intended.
1651	The ORV's obviously enjoy recreating in this area, and they add to the upheaval.
1661	In addition, we are hikers and wilderness backpackers. So many areas we used to hike near Grand Junction are now too crowded. Specifically, ORV use in the area is already too high. Please do not permit more ORV use and control existing use to maintained trails.
1685	Limit all dispersed camping to existing campsites.
1687	Jumbo Mountain near Paonia is a popular recreation area. It should be managed exclusively for recreation with trails designated for specific uses. The BLM should investigate new access points.
1715	I live in Ridgway and have enjoyed the area east of Ridgway State Park. I support the local mountain biking group TRED which wishes to manage this area for mountain biking and hiking. Motorized use of this area would be at cross purposes to Ouray County's needs
1746	My wife and I are lifelong residents of Colorado. We enjoy camping, hiking, fishing, hunting, rock-hounding, and most recently gold prospecting.
1765	Encourage BLM to emphasize resource protection in this RMP, providing extensive unroaded areas where quiet-use recreationists can experience solitude and natural soundscapes and viewsheds, and where wildlife and wild rivers can thrive unimpeded by off-road vehicles or energy development. BLM should complete a comprehensive travel management plan as part of the RMP to ensure that planning is done at a landscape level, accounting for impacts of all uses.
1777	ORV may be fun for the user but they destroy the area for all others, including erosion & excessive noise, which of course if what they like the most.
1832	Another area is the parcel across Highway 550 from the State Park. This is being proposed as a mountain bike and hiking recreation area. ROCC is in support of this proposal and sees this as a possible positive attribute to the economy of the area and as a bonus to campers in the State Park. We would urge the management of this area to be used as proposed and closed to motorized use to avoid user conflicts. It would also be wise to put a seasonal closure for biking activity to protect wildlife habitat during wildlife calving season.
1833	A third area of interest is the McKenzie Butte. This area has some historical significance as well as a recreational possibility. There is an old roadbed, (possibly stagecoach) a railroad bed and some very striking scenic values. Because of the proximity to the State Park it would seem that there are some easily developed recreational possibilities for quiet use activities.
1834	Across Highway 550 from McKenzie is the Chaffee Creek drainage that abuts Billy Creek DOW area. This area is reputed to contain a burial tree and may contain some historically and archeologically significant sites. It would also be a suitable area to be developed for quiet uses such as bird and wildlife viewing as well as hiking.
1848	Other portions of the field office should be studied and designated as primitive and undeveloped SRMAs (Special Recreation Management Areas) to protect the remote and rugged landscapes the BLM is famous for, as well as the quiet use experience! Keep back country primitive and un-crowded, limit trail densities to reduce habitat fragmentation and maintain open space. No new trail build-up in WSAs and areas that have wilderness or natural character.
1863	Dolores River Canyon Special Recreation Management Area (SRMA) The 1985 San Juan/San Miguel Planning Area RMP designated the Dolores River Canyon as a Special Recreation Management Area. The boundary took in the entire corridor from the McPhee Reservoir to Bedrock, and included the Dolores River Canyon WSA. Since BLM management boundaries have since been changed, a portion of the SRMA is now within the San Juan FO and a portion is within the Uncompahgre FO. We recommend that The Dolores River Canyon SRMA retain its special management status, including the portion within the Uncompahgre Field Office. The San Juan Public Lands Draft Land Management Plan released in 2007 maintains a special designation for the portion of the corridor in their jurisdiction. Pertaining to specific SRMA planning and management procedures we ask the UFO to refer to the broader conservation community's comments we incorporated above regarding "Recreation and Special Recreation Management Areas."
1879	We briefly polled a few of our members who regularly visit the UFO who live in the Grand Junction, Delta and Montrose areas and they were very specific insofar as what they would like to see in a new Land Use Plan: More Single Track Trails (motorized and mountain bike)!! More ATV trails!! More 4x4 trails!! More Rock Crawling

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	Trails!! (They asked me to make that point with BRC's characteristic gusto, so that you folks on the planning team would incorporate this important comment into the decision making process.)
1880	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 · 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 as first-time buyers. National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands, U.S. Department of Interior Bureau of Land Management, January 21, 2001, p. 1- 2. "[BLM's OHV] Strategy recognizes, as does policy outlined 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 (FLPMA), 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, U.S. Department of Interior Bureau of Land Management, January 21, 2001, p. 2-3. At least one Alternative should seek to meet the need to provide for increase motorized recreation experience.
1881	BLM planning should take into account the substantial already existing non-motorized opportunities in balancing the input from conservation groups who desire that motorized recreation be drastically reduced. BLM should also take this into consideration when/if the consideration of minimizing recreation conflict is addressed in the revised RMP. BLM must recognize the abundant opportunities already present for "non-motorized" solitude. Wilderness advocacy groups often assert that there are conflicts in values anywhere and everywhere that involve OHV access. But BLM must balance the many venues presently available for wilderness experiences and the limited numbers of people who recreate in wilderness areas. The relative minority cannot be allowed to destroy the recreational opportunities of the majority, especially where they already have abundant non-motorized recreational opportunities. The Planning Team will, no doubt, get many letters from members of Wilderness advocacy groups indicating the overwhelming need for a non-motorized recreational experience. When considering the input of people who desire an experience away from those who use vehicles for recreational access, the Planning Team must consider the already abundant recreational opportunity available to those persons both within and adjacent to the planning area.
1882	All of the Alternatives should focus on educational opportunities to eliminate, minimize or reduce user conflict. The Planning Team should consider management alternatives with a strong public land user educational component.
1885	The Planning Team should look for management alternatives that provide for mitigation and management of these "staging areas" or "Tot Lots" instead of closure.
1886	The Planning Team should seek input from county and local governments, individuals and OHV clubs for input on where popular play areas are located and how they could be better managed.
1887	BRC emphasizes the need to provide for trials motorcycle and 4x4 rock-crawling opportunities in the new RMP. Trials motorcycling and rock-crawling are very popular in the area. There are many areas in the UFO where providing this type of use can be provided in a sustainable and manageable manner.
1888	Permitted and Competitive events should be planned for in the RMP. In anticipation of Special Recreation Permit requirements for organized recreation activities as well as to streamline the permitting process for mountain bike events and off highway motorcycle races, BRC suggests the UFO consider developing an Alternative that would evaluate certain routes/areas for competitive and permitted events.
1892	There is a need to provide for commercial motorized tour operators. Yet another popular activity that is expected to grow, motorcycle and ATV tour operators provide a needed service and economic benefit to adjacent communities. Similar to our recommendations regarding permitted and competitive events, 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.
1893	BRC emphasizes the need to follow through on existing activity plans. BRC appreciates the efforts made to

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	implement the existing UFO RMP over the years. All too often, BLM planning seems to be an academic exercise, with little site-specific implementation resulting from the plans. Where possible, the BLM should consider the RMP revision an opportunity to expedite the implementation of the existing recreation activity plans.
1896	And the OHV community also understands that not every area is appropriate for OHV use, and areas need to be provided for non-motorized and primitive recreation opportunity.
1897	What we do not support is being presented with a "range" of management alternatives which all represent a significant reduction in OHV and other recreation opportunity. NEPA imposes a mandatory procedural duty on federal agencies to consider a reasonable range of alternatives or preferred alternatives analyzed during a NEPA process. 40 C.F.R. § 1502.14; 40 C.F.R. § 1508.9. "[A]gencies shall rigorously explore and objectively evaluate all reasonable alternatives." 40 C.F.R. § 1502.14. The alternatives section is considered the "heart" of the NEPA document. 40 C.F.R. § 1502-14 (discussing requirement in EIS context). There is a need for, and BRC strongly encourages the UFO to develop, 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.
1901	Cumulative loss of OHV recreational opportunity The cumulative loss of OHV related recreational opportunity is a significant issue that should be incorporated into the analysis and into the decision making process. NEPA requires federal agencies to properly analyze the direct, indirect, and cumulative effects of the proposed action. 40 C.F.R. § 1508.8. Cumulative effects include "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions..." 40 C.F.R. § 1508.7. In NEPA, the term "environment" includes the "human environment" which "shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment." 40 C.F.R. § 1508.14. Thus, the agency's duty to analyze impacts does not end with impacts to the physical environment, but includes all of the effects on the human environment, including the effects by vehicle-assisted visitors. Discussion: BRC emphasizes the need to provide sustainable travel routes for motorized recreation. This need has resulted from both an increase in the popularity of OHV use and the elimination of OHV opportunities in the area. It is necessary to develop an Alternative that will focus on the designation and development of motorized trails in the UFO. Motorized recreational opportunity has been and will be drastically reduced throughout the region. Travel management plans on adjacent BLM and National Forest lands have reduced opportunity for motorized recreationists, while at the same time provided additional opportunity for those who prefer a non-motorized experience. Future restrictions, including road and trail closures pursuant to the recently finalized Moab District Office RMP and Travel Plan, as well as adjacent USFS offices in Colorado, will amplify this situation. It should be noted, and incorporated into the decision-making process, the fact that in recent years much in the way of world class recreational opportunity has been provided for nonmotorized public lands visitors. Here are just a few examples: - Changes made to Travel Management resulted in the loss of traditional motorized access in order to provide for an increase in popularity of non-motorized recreation. - There is a new National Conservation Area with a new management plan. - There is a new designated Wilderness Area. - New non-motorized emphasis areas near Fruita via the 21 Road route designation plan. - New mountain bike trails across the UFO, including the planning area. The amount of motorized route and area closures has reached a critical mass. Every single mile of motorized route that is open today is extremely important. Further closures will have a larger impact than those in the past.
1903	Regarding: - Managing public lands and resources, including authorized and permitted land uses, for a growing population and expanding urban interface, with consideration for community values and needs. - Managing increasing numbers and types of human activities and uses; In increased population and development adjacent to the planning area and the controversy over how the agency should respond make these excellent planning issues. We aren't clear as to what exactly the distinction between the two issues are, so it seems logical to recommend the planning team put a bit of effort into better descriptions, or if warranted, combining the two issues. Like every good planning issue, these come with classic "opportunities and constraints." From the perspective of BRC's members and supporters, regional population growth increase the importance of recreational uses on adjacent public lands. Population growth increases the need to provide a diverse range of recreational opportunities. BRC's members also understand and support the need to increase management when the adjacent communities are growing. We note that the vast majority of our members supported the recent travel management activities in the UFO, even though they reduced our opportunity for access and recreation. This has resulted in an interesting conflict. Increased population has increased the need to provide motorized recreation – recent planning process significantly reduced recreation. What to do? In response, we

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	formally request that at least one Alternative should seek to enhance a diverse range of outdoor recreation opportunities in response to this issue.
1915	BRC intends to challenge alternatives, or elements thereof, that are based on junk science or anecdotes. For example, we have observed and documented big horn sheep choosing to pasture immediately next to Highway 91 just north of Moab. We have observed deer choosing to pasture near roads and even residential roads. We are aware of studies that show that wildlife are not disturbed by motorized vehicles but are more likely to be disturbed by walking persons. Therefore, we intend to vigorously challenge any proposed seasonal restrictions on motorized uses of roads and trails. The agency must document a nexus between any alleged need to protect and any resulting decision to restrict motorized travel. The alternatives and analyses must consider the useless effects of restricting motorized travel. For example, if protection of deer fawning is supposedly an issue, the discussion must acknowledge that humans will still be present who are mountain biking, hiking or horseback riding. By acknowledging the continuation of these activities, the agency will have no quality basis to discriminate against motorized travel.
1916	When developing Alternatives, the BLM should recognize the public's desire to keep existing opportunities open. BRC participated in two surveys conducted by Public Opinion Strategies, Inc. Both studies show substantial widespread public support for managing recreational uses, but also for keeping existing roads and trails open, as well as substantial public opposition to proposals made by preservationist groups that would eliminate a vast majority of the motorized access. Although questions were not asked regarding the UFO specifically, we believe the surveys provide some valid information that should be considered as you develop the Final Plan. PSI Utah Poll Summary: OHVs are by far the most desired and utilized means to obtain solitude in nature. A poll conducted in April, 2000 by Public Opinion Strategies, Inc. (POSI), a nationally respected polling firm located in Alexandria, Virginia, found that nearly two-thirds of Utahans use public lands for recreation either "a lot" (27%) or "some" (38%). Only 13% of Utahans said they never recreated on public lands. An overwhelming eighty-six per cent (86%) of Utahans said they used motorized vehicles to travel to Utah's federal lands or when they use the lands for recreation. Of the eighty-six per cent, two-thirds said they utilized a truck or four-wheel drive. In response to the POSI poll, 82% of Utahans said they "strongly" favored (48%) or "somewhat" favored (34%) maintaining roads and trails to disperse use and address environmental concerns. Sixty-eight percent (68%) strongly agreed with the statement "Roads and trails on federal lands in Utah which have historically been open to public use should remain open to public use." An additional 23% somewhat agreed, bringing the total support of the statement to 91%. BLM must recognize that providing for OHV use and protecting the environment means fully utilizing the inventory of existing roads and trails. In some areas providing that reasonable balance may require additional access and additional recreational opportunities. PSI Western Slope Summary: Public Opinion Strategies conducted a survey of 500 registered voters in the eight counties in or surrounding the Grand Mesa, 1. Those counties are Gunnison, Hinsdale, Montrose, Ouray, San Miguel, Delta, and Mesa. Interviews were collected March 21-23, 2006. The margin of error associated with a sample of this type is + 4.38%. Nearly three-quarter of the region's voters reject Forest Service changes that could limit public access. - Fully 73% of local voters say the Forest Service should not change the current regulations to reduce public access on the Grand Mesa, Uncompahgre and Gunnison National Forest. A majority of 58% say they strongly feel this way. More than six-in-ten voters in every single county oppose efforts to reduce public access, with opposition most pronounced in Delta County (78% should not change regulations), Mesa (74%), and Montrose (72%). Opposition is across the political spectrum, as 65% of Democrats, 76% of Independents and 74% of Republicans oppose these proposed changes. Sportsmen are particularly opposed, as 81% of hunters and 76% of anglers say the Forest Service should not change regulations to reduce access. - Opposition to reducing access is HIGHER among the 45% of the electorate who say they had heard about these proposed changes already. Fully 78% oppose the Forest Service reducing access among those who have seen "a lot" or "some", as compared to 69% opposition among those who have seen little or nothing about the issue. - Even when voters are provided with greater detail about the potential changes, a majority of resident stand firm in their opposition. Voters were told that... One proposal being considered by the Forest Service would more than double the area that would be closed to residents who choose to use a motorized vehicle to access the back country. Residents would still be able to hike, bike or horseback ride on trails. Having heard this additional information, six-in-ten (59%) continues to believe the Forest Service should not change the current regulations to reduce public access, with 49% strongly feeling this way. Perhaps most stunning is the fact that a majority (52%) of self-described environmentalists oppose these proposed changes. Voters in the GMUG area are much more inclined to support a plan that features a variety of uses and recreation opportunities than the priorities stated in the Mountains to Mesa (M2M) proposal. [see: http://www.hccaonline.org/page.cfm?pageid=2059] -

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	Two-thirds of respondents choose a plan that emphasizes balanced uses, while rejecting an exact description of the priorities detailed in the executive summary of the M2M plan. When asked what the most important priority for the National Forest Service should be, by greater than a two-to-one margin, voters select... 65% Ensure a balanced approach that allows many uses of the land by maintaining access residents have now to the trails, natural areas and streams, and allowing diverse recreation and human uses of the forest 27% Protect and restore the native biological diversity of this area, through stopping the fragmentation of the forest, allowing natural processes like wildfires, and recognizing that recreational and other uses are less important than the primary goal of sustainable ecological management A plurality of voters in every single county supports the multiple-uses approach. Moreover, a majority of self-described environmentalists side with maintaining access (50%) versus the goals from the M2M plan (40%). In addition to access, voters also place personal importance on energy independence and economic vitality. - The personal importance of maintaining access on National Forest land is 24 points higher than increasing the amount of National Forest land set aside as wilderness. As seen below, the percentage of the electorate which places strong personal importance on energy and economic issues far exceeds other concerns: Reducing our nation's reliance on foreign energy imports 75% very important issue to me personally Increasing the number of good-paying year-round jobs in our communities 74% very important issue to me personally Maintaining access to trails, streams, and natural areas on National Forest land owned by the federal government 65% very important issue to me personally Helping small businesses grow and expand, so they can provide more people with good-paying jobs with benefits 62% very important issue to me personally Increasing the amount of National Forest land which is set aside as pristine wilderness with limited access 41% very important issue to me personally Even when faced with a purely economic rationale for preserving access to public lands, local residents are more likely to side with tourism, energy and economic uses. - There is very strong agreement with a number of economic reasons for maintaining access, including... 80% agree, 53% strongly agree The ability to drive into the back country to hunt and fish is important to the rural economy. Hunters and anglers spend millions of dollars every year in Colorado. We should not risk making changes that could negatively affect many small towns who rely on hunting, fishing and tourism for their local economy. 62% agree, 35% strongly agree The ability to drive on existing roads is necessary for energy companies to explore and produce energy in this area. Imposing these so-called Clinton roadless rules could mean the loss of many good paying jobs, and a multi-million dollar hit to the area's economy. We should not risk making changes that could negatively affect our regional economy. This is not to say that local voters are anti-conservation - significant numbers take part in outdoor activities. However, the data demonstrates that they believe that access to public lands is an important element in preserving a conservation ethic. - The vast majority of respondents take part in outdoor activities, with one-third having engaged in motorized recreation recently. 79% Visited a natural area, forest or park to take part in non-motorized recreation such as hiking, rafting, horseback riding, fishing, or mountain biking in the last year 70% Visited a natural area, forest or park to view wildlife or for bird watching in the last year 50% Purchased a hunting or fishing license in the last three years 33% Visited a natural area, forest or park to take part in motorized recreation, such as riding off road vehicles or snowmobiles - Thus, it is not surprising that regional voters support encouraging access to the outdoors - not limiting access. 87% agree, 44% strongly agree Whether it is from the backseat of a jeep or hiking with their family, the more children get out in the outdoors, the greater their appreciation for nature will be. We should be encouraging people to visit the forest, not limiting access to it. 72% agree, 44% strongly agree The best way to instill a love for our area's natural beauty, wildlife and special places is to encourage people to visit it. Limiting access to over one million acres will backfire in the long run, as people who do not experience the outdoors do not value and want to protect it. In summary, voters strongly resist the proposed changes in the GMUG, which could limit public access to National Forest land. Voters in this area are accessing the outdoors for a number of reasons. Voters go so far as to agree that the National Forest Service should be encouraging access instead of contemplating limits on access. In addition, the electorate in this region is more likely to place emphasis on protecting access for industry and energy production, and views those interests as personally important to them. These results are meaningful for the UFO and are consistent with the documented increase in the popularity of vehicle-based recreation. Please consider this information as you develop Alternatives.
1945	Analysis of impacts will consider potential interaction between management decisions and changes in the larger social and ecological context. In particular, impacts will be analyzed to consider potential interaction with larger-scale dynamics such as climate change; proliferation of invasive species, insects, disease and wildfire; exurban development; changing recreational patterns, and the like.
1985	The Uncompahgre Field Office appears to be leading the charge in creative management of high-impact uses such as off-road vehicles. Based on Peach Valley, we have a high level of confidence that, with adequate

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	resources, the UFO will develop creative approaches for other parts of the field office as well.
1986	RMRI's main perspective in these comments is exploring how recreational trails can be designed to reduce habitat fragmentation for wildlife and restore a sense of wildness to the land. RMRI is also interested in, but doesn't have a solution to, the dilemma of how to maintain the uncrowded backcountry feeling of UFO lands even as they become more popular. The only obvious solutions we can think of are confining high impact trail uses to contained areas, and leaving trail opportunities unpublicized.
1987	The 2007 Colorado BLM Recreation and Visitors' Strategy emphasizes the importance of 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 [the BLM's] recreation settings" (p. 7). The new Benefits-Based Management approach is intended to retain "more primitive, natural-looking and undeveloped recreation settings" and acknowledges that the traditional "activity-focused approach" has been "diminishing the character of the lands that produced beneficial outcomes to the public" (p. 4). Some portions of the Uncompahgre FO not just WSAs and Citizen Proposed Wilderness still retain their primitive, undeveloped character but are at risk for losing their naturalness. The BLM should identify and actively manage these lands to protect and enhance their primitive, backcountry character. For example, in the Nucla/Naturita/Paradox Valley area, we encourage the UFO to use the RMP to reverse the downsliding of recreational settings that is occurring with the increased motorized use .
1988	The 2007 State BLM Instruction Memorandum directs managers to: "Ensure that travel management decisions...maintain prescribed setting character..." (p. 2). We recommend that the RMP maintains---and even restores---less developed recreation settings wherever they are found. Returning impacted areas to a more natural condition is justified because so much of the ROS downsliding has occurred only in the last 3 – 5 years.
1989	Tools exist for preventing ROS slippage in the future. For example, the 2007 State Director's Instruction Memorandum states 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. The notion of limiting numbers of motorized users is new, but it may not be too early to look ahead to this possibility to maintain remote backcountry settings. Besides setting user thresholds, other ways to maintain open space as mentioned above are: a) reducing route densities that take the wildness out of the land b) containing and more intensively managing high impact recreation uses such as ORVs and shed antlering c) identifying and protecting the last wild places land. RMRI sent a letter separately postmarked March 29, suggesting a method for doing this last.
1994	Reducing motorized recreation impacts As trail machines get faster and more versatile the land shrinks accordingly. Recreational trail expansion is on a collision course with land health; the land base, vast as it is, is too small to accommodate indefinitely expanding trail systems. The trick is to accommodate more use and provide satisfying opportunities on less acres and less miles of trails, something the UFO has commendably managed to do in Peach Valley. Other examples that could be studied are the Oregon Dunes, Arizona Strip, and OHV areas in California
1995	Principles for sustainable motorized trail systems: • Concentrate use in a contained areas and corridors near population centers where it can be managed and patrolled • Make loops, destinations, close or tie together dead end spurs, eliminate parallel routes, avoid tempting off-trail areas • Use intensive---and expensive—management in the form of signage, fencing, field presence • Make paper maps and kiosks the basis for enforcement, not signs, as signs are torn down • Publicize a policy that if a route is not signed or found on a map it is closed---create a "culture of compliance" • A final tool for maintaining quiet settings is limiting numbers of motorized vehicles, as authorized by the 2007 State Director's IM quoted above. This is not yet common but is a tool that will become more so as competition for trails increases. Other tools for preserving less crowded, more natural-feeling settings are quotas, or even alternating days for types of use.
2000	Capacity We support the capacity recommendations in the SRCA letter. See Price, Utah, permit process.
2001	Event promotion There can be a disconnect between the outside world's unfettered promotion of BLM lands and the BLM's ability to accommodate the demand this generates. Widespread publication of new mountain bike

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	and motorized tail systems invites unanticipated increases in use adding to management burdens. Events also attract new attention to an area. In response to this problem, Appendix C of the LUP Handbook and the State Recreation and Visitors Strategy contain guidance on how to manage marketing so as to maintain targeted recreation settings. For example, the SRMA definitions section in Appendix C includes "appropriate restrictions on marketing" as one of several implementation actions to be done on SRMAs. This can apply to events as well. Group events should be approved contingent on the BLM's proven ability and resources to manage them, and a formal framework established whereby all the components of a well-managed, low-impact event are in place prior to the event. The Calamity Pass Enduro in the Parks Ranger District in North Park is an example of a permitted event where the Forest Service set conditions sufficient to allow the agency to keep the initiative in the negotiations and to somewhat protect the land.
2002	Dispersed Camping Motorized use off roads and trails should be discontinued except for designated parking and pull-out areas. Dispersed camping should be restricted to designated campgrounds Off-road parking should be allowed one car-width from a road or motorized trail Disallow ATV game retrieval
2003	Consistent management with adjacent FS lands Manage motorized use to be consistent with management on adjacent jurisdictions, for example Tabeguache and Camel Back/Roubideau where management on both sides of the boundary need to match.
2006	Set limits on new technology As mentioned above, ORV and mountain bike technology is on a collision course with the limits of the land. Long distance, go-anywhere vehicles have out-paced the ability of BLM lands to meet the need. Unlike grazing, mining, and logging, no laws provide a safety net for the land from new trail technologies. We recommend the RMP include a field office-wide permanent closure to any new technologies that crop up in the future such as rhinos, segways and others, until their impacts can be analyzed under NEPA. Another example is ATVs wider than 50 inches. These too should be banned until their impacts are studied. In any case they should be limited to full size vehicle roads. The definition of a trail should not be altered to include them. It is not the BLMs responsibility to accommodate indefinitely the spread of a use that has no upper limit. The BLM needs to establish a threshold for the number of vehicles it can accommodate based on carrying capacity, and for anything more, trust the industry to fall back on itself.
2007	Concentrate, do not disperse trail use Many arguments have been put forward against closing motorized routes on the theory that dispersing use on more miles of trails reduces crowding, resource damage and user conflict. This would be true if there were an upper limit to growth in motorized use. Since there appears to be no upper limit and since resource damage is already exceeding Land Health standards, motorized use needs to be concentrated in defined, well maintained corridors. The bottom line is the land, not endlessly expanding recreational access. The BLM cannot be expected to accommodate open-ended growth indefinitely.
2009	Special Recreation Permits - Outfitter-guides, fund-raising, competitive events In granting permits, put the needs of the land and of the general visitor public ahead of the demands of outfitter guides. Retaining remote settings, meeting land health standards, protecting wildlife and non-outfitted activities should come first. Set capacity limits as the Price Utah BLM did to establish limits for commercial outfitter guides and Special Recreation Permits. Allow competitive recreation events only if they can be managed to have low impacts.
2010	Mountain bike management: Much of the above applies to mountain bike trails We recommend some trails for horse-hiking only Do not locate mountain bike trails in difficult-to-patrol areas with easy off-trail access/ For example with the Paradox Trail, avoid wildlife areas, sensitive plant communities, grasslands, riparian, cryptogamic soils, etc. Trails stay open contingent on users staying on trail
2011	Shed Antlering: In this activity the ATVs move in a grid pattern going off roads cross-country, disrupting and displacing big game at a critical time in the spring when their body reserves are down and forage is not yet greened up and producing nutrition. In addition to disturbing animals, antlering damages sage brush, grasses, soils, and causes erosion and other unacceptable resource damage. The RMP is an opportunity to enact strict new regulations; and the use should be permitted like lion hunting, fishing and other highly damaging or depleting activities Antler hunters should be restricted to existing routes like other motorized users and ATV antler gathering should be prohibited altogether with a March-April seasonal closure. Like anyone else, antler gatherers should park and walk to protect the fragile soils and vegetation. Even if ATV antlering is restricted to "existing" routes, so many existing routes are out there that further closures are necessary to eliminate the impacts of this damaging activity.
2012	SRMAs/ ERMAs: ERMAs are used when there is no perceived "desire" for "structured recreation activities." We believe the Benefits Based Management outlook may be overestimating how much "structured recreation"

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	people want or how universally on the landscape they want it. Mesa State and other studies show that most BLM recreationists want a natural setting and experience. SRMAs, emphasizing "structured recreation," may also be at variance with the 2007 State Recreation and Visitors Strategy that calls for maintaining the BLM's wide open spaces. SRMAs are appropriate in concentrated areas where high impact recreation threatens to overwhelm the environment, but most places in the UFO more appropriately lend themselves to ERMAs. Undeveloped SRMAs may in rare cases be appropriate for hiking and other low impact uses where these uses need intensive management to prevent incursions and loss of primitive settings.
2013	Setting visitor numbers too high: Because the life of an RMP is 15 to 20 years, there is an incentive to set visitor encounters and group sizes artificially high on the Recreation Settings Matrix to accommodate increased recreation use over time without amending the RMP. Specifying use numbers higher than those reflecting the current situation can become a self-fulfilling prophecy, especially if a community or destination SRMA is widely advertized. We recommend instead that settings, visitor encounters and group sizes be adjusted from less crowded to more crowded incrementally over time through Adaptive Management as was done in Jack Morrow Hills.
2014	Recreation in balance with natural values: We also question a perception inherent in BBM that BLM lands are primarily for recreation, rather than recreation being presented equally with biodiversity. Mesa State studies that focus on human uses, experience and connections to the land may not have fully teased out the segment of the public who either will never go to remote lands but want to know they are protected, or those who feel that human use is not the only goal of land management but rather that landscape integrity has value in and of itself independent of its use as a recreation experience.
2015	SRMA promotion and advertising: Another contradiction that may be built into the SRMA framework is that the fact of designating a SRMA can potentially attract use that downgrades the very settings the SRMA is intended to protect. Entities such as the Colorado Tourism Bureau may also promote shoulder season" recreation on BLM lands and other opportunities that are not in sync with the BLM's intentions and capabilities. The 2007 State Recreation Strategy suggests 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" (p. 6). "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 dilemma, Objective 2 in the Recreation Strategy says the BLM will "Encourage Sustainable Tourism Collaboration" with business and tourism entities. The Recreation Strategy encourages BLM field offices to "engage the business community and local governments in …..managing….use of public lands that meet or exceed land health standards" (p. 9). We recommend measures that will allow the UFO to implement Objective 2 on page 9 of the Strategy and help outside promoters "understand approved recreation setting prescriptions and management objectives" and "market public lands responsibly." For example, the Glenwood Springs Field Office, has obtained an agreement from local government to limit marketing efforts to ensure its Community SRMAs do not morph into Destination SRMAs.
2016	MOUs/collaboration: We understand that recreation partnerships expand management capability and provide higher service delivery levels. However, in the same way that unmanaged promotion can get off track, MOUs with non-BLM entities risk stretching the BLM's land stewardship mission toward that of the partner. RMRI recommends that the BLM's mission always come first
2017	Lion Hunting: While for the most part lion hunter trucks stay on roads this activity is damaging sage grouse habitat and other sensitive resources some parts of the UFO. There are numerous lion hunting permit applications showing on the UFO website. Because lion outfitters cover so much terrain with trucks, dogs and people, up to 200 miles a day, we recommend caution in approving too many new permits on top of existing ones. We recommend that DOW lion quotas be generously accommodated.
2018	Rock Climbing: This is yet another sport that impacts plants and wildlife. Cliffs and ridges are concentrated areas for raptors, bats, and a host of bird, plant and other species. The UFO has many cliff and canyon areas and we encourage the BLM to take a strong stand in support of cliff ecosystems and place adequate constraints and regulations on this increasingly demanding sport.
2027	Whitewater enthusiasts, naturalists, and other backcountry users of all stripes value the rugged beauty, wildlife, quiet solitude, and connection to history these canyons offer.

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2029	The river supports a variety of economic and recreational activities that benefit nearby communities. Working farms and ranches, professional outfitters anglers, historians, river runners, hikers, archeologists and recreationists all share an interest in preserving the Dolores River Basin.
2034	If managed in this recommended manner, WSAs and CWP lands in the Uncompahgre FO will not only remain available for possible future designation as Wilderness, but will also ensure and expand the opportunities for backcountry recreationists to experience a sense of adventure and discovery
2041	Dolores River Canyon Special Recreation Management Area (SRMA): The 1985 San Juan/San Miguel Planning Area RMP designated the Dolores River Canyon as a Special Recreation Management Area. The boundary took in the entire corridor from the McPhee Reservoir to Bedrock, and included the Dolores River Canyon WSA. Since BLM management boundaries have since been changed, a portion of the SRMA is now within the San Juan FO and a portion is within the Uncompahgre FO. We recommend that The Dolores River Canyon SRMA retain its special management status, including the portion within the Uncompahgre Field Office. The San Juan Public Lands Draft Land Management Plan released in 2007 maintains a special designation for the portion of the corridor in their jurisdiction.
2042	Pertaining to specific SRMA planning and management procedures we ask the UFO to refer to the broader conservation community's comments we incorporated above regarding "Recreation and Special Recreation Management Areas."
2064	This is an outstanding natural landscape, which includes several unique plant and animal communities and provides one of the most spectacular recreational boating experiences in the country
2073	Importance of less-roaded lands: Due to their less roaded condition these areas may be among the few left on the landscape where vegetation is relatively intact, where forage, soil, water courses, archeologic, paleontologic and historic resources are relatively undisturbed and where wildlife security, silence, solitude, quiet use, hunting, wildlife viewing and other such qualities can still can be found.
2074	To underscore the importance of less roaded and trailed land, we trust the UFO has access to the large bibliography of studies that show the negative impacts of roads and trails on wildlife and natural resources---- research which applies to mountain bike and hiking trails as well, not just to motorized trails!
2079	Designating these areas nonmotorized is further justified by the fact that these areas have managed to stay roadless for so many decades of mining, grazing and logging that there are likely good reasons why nonmotorized designations will not preempt other uses. For the most part these areas are mesas or ridge tops with poor access or little uranium potential.
2083	Plus, the overwhelming need on this particular landscape is not for ~motorized routes, but for more unroaded undisturbed backcountry for wildlife and quiet users alike!
2085	Next Steps: Identifying less roaded areas like this could be a first step in identifying other values that make these lands worth protecting. As an example, we visually correlated the highlighted areas with maps of deer severe winter range and elk winter concentration areas, to hone in on their wildlife values. Several of the areas for example are used by wintering big game.
2092	Final Step: The final step involves management direction, giving the areas non motorized and perhaps nonmechanized management prescriptions, identifying levels of protection for plants and wildlife, levels and intensities of quiet use, whether the areas will be identified as ERMAs or SRMAs, finding citizen adopt groups, etc.
2095	This Forest Service roadless area in combination with the Tabeguache SMA forms one large, undeveloped wildlife security area that includes Spruce Mountain and a prized big game hunting area adjacent to the SMA on the north. The area is in Game Management Unit 61, one of the most soughtafter hunting units in Colorado. And much of the area appears to border an elk winter concentration area on the GIS elk map enclosed.
2099	Mountain Bike Management: The BLM Tabeguache Special Management Area is a wilderness area in everything but name and as such needs to be managed for horse and hiking use only, not for motorized or mountain bike use. We understand the BLM has been actively managing it this way and we would like to thank you and strongly recommend that mountain bikes continue to be disallowed.
2114	Nyswonger Mesa is an example of an area that should be actively analyzed by the BLM for its forage and wildlife values and for its potential to be set aside as a rare and needed quiet use area.

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2121	Skein Mesa and Wild Steer Mesa: It is not clear if these areas are inside the UFO boundaries, but like the other areas highlighted on the map, they appear to have potential nonmotorized, quiet use areas.
2125	The UFO management unit contains some of the most heavily used and productive Colorado Division of Wildlife (CODOW) game management units (GMU) in the state. Any development within the UFO TRCP Scoping Comments: Uncompahgre Field Office RMP 2 management unit should be planned to uphold and maintain the wildlife and sportsmen's values of these GMUs.
2126	The eleven GMU's (52, 53, 60-65, 70, 411 and 521) that partially or wholly fall within the UFO management unit are used by sportsmen to hunt mule deer, elk, turkey, mountain lion, desert and rocky mountain bighorn sheep, black bear and pronghorn antelope. In 2009 24,239 elk hunters (12% of the total elk hunters in the state) frequented the GMU's falling within the UFO management unit and this activity accounted for 125,364 recreation days (12% of the total elk hunting recreation days in the state). These GMU's also hosted 8,007 mule deer hunters amounting to 36,495 recreation days last year. In terms of harvest, a total of 6,364 elk (13% of the state total) and 4,508 mule deer were harvested within these GMU's. Out of the 185 GMU's in the state, GMU 62 ranked first for total number of elk hunters and total elk hunting recreation days while ranking fifth for total elk harvested in 2009. GMU 70 ranked fourth in the state for total number of elk hunters, third for total elk hunting recreation days and second for total elk harvested in 2009. These two GMU's were also extremely productive for mule deer hunters as shown in the harvest data from 2009. GMU 70 ranked second in the state for total number of mule deer hunters and total mule deer hunting recreation days while ranking first for mule deer harvest. GMU 62 ranked third in the state for total number of mule deer hunters, total mule deer hunting recreation days and total number of mule deer harvested. The BLM lands that fall within these two highly touted and productive GMU's (primarily San Miguel, Montrose and Ouray counties) should be given special consideration in the UFO Resource Management Plan (RMP). It is also worth noting that only three GMU's in Colorado were licensed for desert bighorn sheep hunting last year, two (GMU's 62 and 64) of which occur within the UFO management unit. Montrose, Delta, Gunnison and Mesa counties were very productive for turkey hunters in 2009, accounting for 16% of the total statewide turkey harvest.
2133	The BLM should detail in the UFO RMP how public lands within the UFO management unit will be managed for a balance of uses, as required by the Federal Land Policy and Management Act (FLPMA). The FLPMA mandates multiple-use on BLM administered lands. The RMP must address the current and future effects of management and development on outdoor recreation and fish and wildlife conservation with regard to several key species including elk, mule deer, trout, bighorn sheep, pronghorn antelope, turkey, black bear and mountain lion
2136	The UFO RMP should recognize the areas of significant value for outdoor recreation and plan accordingly.
2140	The UFO should take close consideration of Executive Order 13443, issued on Aug. 16, 2007 and Instructional Memorandum No. 2008-006 issued Nov. 12, 2007. (Available at: http://www.blm.gov/nhp/efoia/wo/fy08/IM2008-006.htm) According to Bureau of Land Management (BLM) Instruction Memorandum No. 2008-006, Implementation of Executive Order 13443, Facilitation of Hunting Heritage and Wildlife Conservation, the Bureau of Land Management directed State Directors to: Evaluate trends in hunting participation and implement actions that expand and enhance hunting opportunities for the public; Establish short and long term goals to conserve wildlife and manage wildlife habitats to ensure healthy and productive populations of game animals in a manner that respects state management authority over wildlife resources and private property rights; Seek the advice of state fish and wildlife agencies, and, as appropriate, consult with the Sporting Conservation Council (SCC) in respect to Federal activities to recognize and promote the economic and recreational values of hunting and wildlife conservation. The Order also directs the Chairman of the Council on Environmental Quality, in coordination with federal agencies and in consultation with the SCC, state fish and wildlife agencies and the public, to convene, within one year after this Executive Order is signed, and periodically thereafter, a White House Conference on North American Wildlife Policy to facilitate the exchange of information and advice needed to fulfill the purposes of the Order. In addition, the Order calls for a comprehensive 10-year Recreational Hunting and Wildlife Conservation Plan that will set forth an agenda for implementing the actions called for in the Order. 1. Presidential E.O. 13443 and BLM Instruction Memorandum No. 2008-006 further requires the BLM to take the following actions: To carry out the Order, the BLM must collaborate with a diverse cross-section of state, local and tribal governments, scientists, landowners, individual sportsmen, non-profit organizations and other interested parties (Non-Federal Partners). To facilitate collaboration, it is important that we identify the near-term and long-term actions currently ongoing or under consideration throughout the agency. This will result in a coordinated approach to implementation,

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	while also giving due consideration to the missions, policies and authorities unique to each agency. 2. Furthermore, according to Executive Order 13443, which states that the United States Department of Agriculture, and the Department of Interior shall: • Evaluate the effect of agency actions on trends in hunting participations and, where appropriate to address declining trends, implement actions that expand and enhance hunting opportunities for the public; • Consider the economic and recreational values of hunting in agency actions, as appropriate; • Manage wildlife and wildlife habitats on public lands in a manner that expands and enhances hunting opportunities, including through the use of hunting in wildlife management planning; • Work collaboratively with State Governments to manage and conserve game species and their habitats in a manner that respect private property rights and State management authority over wildlife resources; • Ensure that agency plans and actions consider programs and recommendations of comprehensive planning efforts such as the State Wildlife Action Plans, the North American Waterfowl Management Plan and other range-wide management plans for big game and upland birds. 3. UFO RMP should adhere to the direction of the President and the director of the BLM by implementing the instructions of this order and instructional memo. These actions will help ensure that planning and development within the UFO is better balanced with the needs of fish and wildlife and sportsmen.
2145	In our view, there needs to be a new strategy to conserve fish and wildlife habitat and associated hunting and fishing recreation while minerals are being extracted from all federal public lands, including BLM lands. The current strategy employed by BLM in Wyoming, Colorado, Utah and other states, has and is resulting in unreasonable losses of fish and wildlife resource values that hunters and anglers believe are avoidable with a new approach to public lands management. The TRCP stands ready to assist the UFO in devising a RMP that balances the needs of fish, wildlife and their habitat with responsible energy development.
2180	Some of our members are natives, others are decades-long residents, still others are more recent arrivals; but all have increasing concerns about the proliferation of vehicle travel off established routes and into previously undisturbed country. Before and during WW II much off-road travel was related to managing livestock operations. During the 1950's tracks were bulldozed in a variety of locations looking for uranium. And in the 1960's The BLM undertook the chaining of pinyon-juniper stands, and the disc plowing of sagebrush flats in vegetation management efforts. The transportation net produced by these activities was consolidated each Fall by an influx of big game hunters (increasingly mechanized) throughout BLM lands, but especially on the Uncompahgre Plateau
2181	In reviewing the categories to be addressed in the RMP which were presented at the open house sessions, with few exceptions the impact of unrestricted machine travel on the subject of those categories was an important, and sometimes crucial element in the problems identified or management actions contemplated. Cultural and paleontological resources can in some cases actually be damaged by machine wheels or tracks, but in any case, unrestricted and uncontrolled travel can increase the opportunities and probability of vandalism. Wilderness Study Areas not only require control, but exclusion of vehicles. In many of the other categories vegetation is the crucial landscape element whether special-status plant and wildlife species or wildlife habitat in general, livestock management, weed control or water and soils are concerned. And it is the vegetation and often the soil that is most immediately and destructively impacted by machine travel.
2186	We urge the UFO to control and strictly limit gas production, mining, motorized recreation, and other uses that threaten the long-term health of natural ecosystems
2189	We urge you to preserve BLM land for future generations and to favor the following low-impact uses: Backcountry silence and solitude. Areas for bird watching, hiking, quiet use, nonmotorized hunting. Quiet, natural soundscapes and landscapes, free of motorized noise
2197	Recreation Permits: Allow competitive recreation events only if they can be managed to have low impacts and if they do not significantly increase overall use. Set carrying capacity limits and other restrictions on commercial outfitter guides and Special Use Permits

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2198	Antler collection: Continue to implement and enforce prohibitions on elk and deer antler collection to stop impacts on soils, vegetation, watersheds and wildlife.
2199	Dispersed camping: All motorized travel should be restricted to existing roads and trails and designated parking and pull-out areas. Dispersed camping should be restricted to existing campgrounds, which should be designated as official campsites. The BLM should not allow vehicular camping anywhere else.
2204	Limit off-road vehicles to areas where they will have minimal impacts on wildlife habitat, quiet users and the solitude of BLM backcountry. According to retired Forest Service wildlife biologist Craig Grother, "It is clear that motorized vehicles affect big game populations, security, distribution, and reduce habitat effectiveness
2293	The fact that TMW member ship is 55 + years should give the planning team the Idea that we have not always been motorized users. Most of our members ride ATVs because we are not able to enjoy public land any other way. This does not mean that we want exclusive use for motorized users. Instead we as a user group want to protect the rite for anyone to use public land as long as they respect and protect the recourses.
2294	Further through the availability of grant funds(from registration fees through state parks) the motorized community brings more monetary clout to the table than any other user group.
2295	I have concerns about the methods of control presently used by public land managers in their decisions. Too often it seems that scientific data is often used in misleading ways to reach a desired goal. Example !! motorized use is detrimental to wild life. In my experience and in most studies a man walking with a dog is the most disruptive to wild life. Motorized is in most cases listed quite a ways down the list. Also too often the protection of plant species when used to restrict use is often only a front for the obstruction groups.
2296	The increase of ATV use and extreme Jeeps is on the increase while over night and extended camping is decreasing. This trend needs to be addressed in this planning process.
2340	Although most of this letter is a "standard" letter composed by The Wilderness Society, I wanted to stress my personal impression of the importance and value of the Uncompahgre lands. I have hiked and climbed in this area, and marveled at the unbroken expanse of wild beauty. Please ensure that the RMP maximizes protection, and prohibits development, of the remarkable wilderness characteristics of Uncompahgre. Thank you!
2357	Although what follows is essentially a form letter, I have backpacked in the Uncompahgre area numerous times, & I feel strongly that permanent protection is well deserved.
2359	I travel from New Mexico to the Uncompahgre area every year to enjoy the wilderness
2364	I have rights too!!! I and others who enjoy quiet hikes and camping in our national parks should not be subjected to the noise and pollution of orv's!!!!! Their rights do not trump mine!!!!!!!!!!!!!!
2373	Recreational use should be carefully controlled as well, and be of the quiet type.
2382	Please don't allow this land to be exploited. Low impact backcountry recreation is rapidly becoming more popular and that is an environmentally sensitive way this land could contribute to the economy. Please don't allow development and non-human-powered recreation which will irreversibly damage another great tract of land.
2385	There is enough land in the West which has been used for oil and gas development and that allows ORV use.
2391	And for people to hike, camp, observe and breath in quiet
2393	I'm commenting on the Uncompahgre RMP revision. My wife and I want a large part of this area set aside to protect wilderness-quality lands, wild rivers, and opportunities for quiet, backcountry recreation.
2406	The Uncompahgre Field Office includes some of Colorado's best wilderness-quality lands, wild rivers, and places to go hiking and bird watching.
2410	The BLM needs a thorough management plan as part of the RMP to make sure that planning is done carefully with wilderness and wildlife in mind. Lands with wilderness characteristics should be closed to motorized and mechanized use. These lands should not be open for drilling of any kind.
2431	Aloha, My husband & I vacation in Colorado and truly enjoy your wild areas. We both enjoy the wild areas; hiking, fishing and wildlife viewing.
2438	I grew up in Colorado, climbing its mountains and fishing its lakes and streams. As a student in Forest Recreation at Colorado State University, I wrote my first letter to Congressman Wayne Aspinall, begging him to spare the

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	Gunnison from development.
2439	My husband and I camped in the Delores Canyon area last October and we were pleasantly surprised. What a beautiful and hidden gem of Colorado.
2456	An excellent way to ensure that taxpayers have environmentally-safe access to these lands is to encourage mountain biking. This method of travel on trails allows users access without damaging ecosystems. Compared to allowing people on horses, for instance, mountain biking does not damage trails and mountain bikers are typically very environmentally aware individuals.
2464	Additionally, my kids and I enjoyed rafting in one of Colorado's rivers with a Wipe-Out turn. Lots of fun and we got drenched. LOL!! Good times!!
2467	I strongly support wilderness, just last year I traveled to that area to recreate. I am a hunter an outdoorsman & a taxpayer & I support wilderness and protections for wildlife.
2496	I go to these places of peace to seek the solitude of my soul. To me it's like going to the highest church in our lands. We must remain the stewards of these spiritual environs and protect the wild life that live there. The Uncompahgre must stay in its pristine state. We must leave it as God's country
2500	My family and I are outdoors recreationists -- hike, backpack, paddle. There are 10 voting age Davidsons, from WV, MD, GA, and TN. Our comment is unanimous: We have all been in the Uncompahgre, we know it is rugged and gorgeous country. We all support its protection at highest levels. Wild rivers, roadless areas, wildlife corridor protection -- all of that.
2521	As the BLM has noted, recreation is the predominant activity on these lands. Protecting these lands for non-destructive recreational uses has the added benefit of helping protect wildlife habitat, cultural resources, and mitigating the impacts of climate change. Use fees should be avoided where possible, but particularly in an age of tight budgets, affordable user fees are a responsible way to let the public contribute to the management of the resources they value and allow planners more options for thoughtful protection and utilization of BLM lands
2527	Having walked up to the peak of Uncompahgre and camping in the meadows below, I can say first-hand that this place is one of the most peaceful places I have ever been. It deserves to remain so.
2541	Thank you for the opportunity to comment on the Uncompahgre RMP revision. As a former New Mexico resident, I enjoyed many of my vacations hiking and enjoying the Uncompahgre. Those days are some of the most blessed and treasured of my entire life.
2553	Though I currently live in Texas, I have spent at least one month every summer since 2000 in southwest Colorado. Some of my finest outdoor memories come from hiking, camping and fishing in the region near and around the Dolores River. I urge you to increase protections for this vital region.
2555	As active outdoors enthusiast - by active I mean getting out there with my own two feet, across Colorado's natural areas, I encourage the BLM to emphasize resource protection in this Resource Management Plan.
2577	We love and have enjoyed many spectacular hikes in the Uncompahgre
2589	The lands to be covered by this plan are lands that I do visit for recreational purposes because I am fortunate enough to live relatively close. As such, I truly appreciate these lands' incredible scenic and recreational values--values that your new plan, as its highest priority, should protect. Thank you for considering these comments.
2632	Motorized recreation has been and remains largely unpatrolled, unenforced and is bordering on an outlaw activity because riders of ATVs, dirt bikes, etc understand there is none to minimal enforcement. In view of the President's declaration that our dependence on foreign oil is a National Security issue and we must engage in conservation, BLM should take this mandate seriously to minimize greenhouse gases, soil erosion and noise pollution. The science on this issue as presented in the new book, Thrillcraft by George Wuerthner is a comprehensive source that BLM must consult in evaluating any alternatives regarding Motorized Recreation
2633	The BLM should at a minimum, analyze alternatives including No Action (status quo), No ATVs, Dirt Bikes or Snowmobiles, or the new experimental playtoys, Personal Aerial Vehicles, and the level of use allowed in the current set of alternatives. Some of the science regarding this issue is presented in the following paragraphs.
2634	Enforcement: The USU Institute for Outdoor Recreation and Tourism has conducted studies showing that nearly 40% of riders admit going off legal trails on their last ride. The Forest Service published a Technical Report in 2005 (RWU – 2905) that recognized there is a lack of evidence that educational programs lead to

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	behavioral changes in motorized users. The DEIS must provide evidence that any proposed mitigation and enforcement efforts will be effective for those alternatives that allow any level of use by these machines.
2635	Noise and Safety: The DEIS must address safety and noise effects to non-motorized users and wildlife. Quiet environments are becoming extremely rare. In a recent study by a professional sound recorder who visited 15 western and Midwestern states, it was found that quiet periods longer than a minute and a half without the sound of motors were difficult to find. Another study pointed out that in 1999, the decibel levels of conversation among Americans had risen to 65 decibels, up 10 decibels from a decade earlier, or a doubling of volume due to elevation of background noise levels. While it is recognized by OSHA and other health officials that exposure to noise of 85 decibels and higher leads to hearing loss, noise at even lower levels can lead to physiological changes in blood pressure, sleep, digestion, and other stress-related disorders. Former U.S. Surgeon General William H. Stewart stated that, "Calling noise a nuisance is like calling smog an inconvenience." , , , , Loud noise, even within established health guidelines, can lead us to feel, angry, frustrated, annoyed and prone to violence in addition to contributing to hearing loss. In the period between 1982 and 2000, the incidence of measurable hearing loss increased by 15 to 60%, depending on the age group. In 1999, the U.S. Census Bureau rated noise as the single biggest neighborhood problem among those surveyed. More than one in ten people cited traffic noise as of concern and nearly half of those said they had considered moving as a way of escaping such noise. The EPA has found that 20% of those surveyed are "highly annoyed" when sound levels reach 55 decibels. Federal regulations for highways dictate that if a new or expanded road will yield noise levels of 67 decibels or higher, efforts must be made to bring about a substantial reduction in noise levels. Generally this involves construction of sound barriers. After Zion National Park banned private vehicles and instituted a low pollution shuttle bus system, visitors commented that the absence of RVs with generators running, buses with clouds of diesel fumes and noise were noticeable and that they could now hear birds calling, streams running, and other low-volume sounds of nature that were previously obliterated by "vehicle noise". Noise is a particularly objectionable aspect of snowmobile use. A Park Service report showed that even "quiet" snowmobiles could be heard more than two miles away, thus affecting a four-mile wide area adjacent to travel corridors or use areas. This means that a snowmobile traveling 50 miles in one day, which they can easily do, can affect an area of 200 square miles. A visitor survey at Grand Teton National Park found that 96% thought snowmobiles had a negative impact on the park because of noise, air pollution and negative effects on wildlife.
2636	Air and Water Pollution: Public Lands and National Forests should function primarily as the watershed for local communities and for preserving natural stream flows and water quality. The combined effects of sediments from watershed uses such as roads, OHVs, grazing and logging, have not been addressed in a comprehensive analysis. No evaluation has been done for the contribution of hazardous pollutants to the air and watersheds where motorized vehicles are used. Atmospheric inversions and canyon environments can trap and hold these hazardous air pollutants and raise exposures to people and wildlife. Fuel and lubricants used in these machines spill on the ground and are carried out in exhaust streams and then deposited into the snow and soils wherever they go. They contain benzene, xylene, toluene, polycyclic aromatic hydrocarbons and other hazardous organic chemicals. As the Montana DEQ states, "A portion of the air/fuel/lubricant charge escapes directly to the atmosphere with the combustion products, producing poor fuel economy and releasing high levels of hydrocarbons as air pollutants. This phenomenon is known as "short circuiting." EPA models and emission factors should be used to determine the impacts on the environment and exposures to cross country skiers and snowmobile users from these machines. Other information is available showing that noise levels of both two-cycle and four-cycle engines reach levels up to 110 dB even in four stroke engines. EPA and the Montana Department of Environmental Quality have provided research on this issue. The EPA and Montana DEQ websites provide links to much of this information and EPA has modeling protocols to allow prediction of emissions from these vehicles . Accumulations of motorized hydrocarbon pollutants from rubber tires, fuel and motor oils collect on rocks and within pothole waters within streams and canyon (USDI, 2005 Jeep Safari EA) which can support and adversely affect wildlife, growth of amphibians and invertebrates used for prey bases (Lefcort et al, 1997). Vehicle disturbance within streams can also negatively affect reproduction of amphibians where eggs and growth occur in warm pools which can be fatally crushed or covered with silt as vehicles pass (Schelz, Salt Creek Report 2001). Limitations on the number of motorized uses and areas of use need to be included in the BLM Preferred alternative of the DRMP/EIS to reduce these motorized impacts. The pollutants emitted by these machines are carcinogenic to humans and highly persistent in the environment, adversely affecting terrestrial and aquatic organisms, including reduced plant productivity, tree mortality and making plants susceptible to disease and pests.

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2638	Western Colorado is one of the most beautiful and fragile regions in the West. I have spent many days exploring the wild Uncompahgre Plateau, floating the Delores and Gunnison Rivers, and enjoying the solitude and peace found on these lands
2644	In addition, many hikers/campers travel to this region to enjoy the solitude and lack of travel and resources infrastructure. Their recreational dollars add to the region's economy.
2649	I live in Maryland, but vacation frequently in Colorado. We have rafted on several occasions in the area that you manage and have also hiked many wilderness areas in Colorado.
2678	I'm a recreational hiker and believe Colorado contains some of the most beautiful hiking areas in the world
2685	We live much of the year near Placerville, Colorado and drive, raft and hike this area often.
2689	I have hiked in, backpacked in, camped in, mountain climbed in, loved, appreciated & been awed & inspired by these lands since I was a teenager - and I'm 54 now. Please protect these precious, irreplaceable lands for our kids and theirs!
2694	Hello, I have rafted 100 miles of the Dolores River and I believe that it is a truly rare and wonderful part of our country and Colorado
2707	As a sportsman that applies annually for the opportunity to pursue game in Colorado, thank you for the opportunity to comment on the Uncompahgre RMP revision. The unspoiled wildlands of Colorado are the main draw that brings me and the money I spend in local economies back to Colorado each year.
2713	I appreciate the opportunity to comment on the Uncompahgre RMP revision. The Uncompahgre is the one place in this entire country that I fell in love with as a youngster and to which i now return over and over again. Though I now live in Pennsylvania, nonetheless I still take my own kids back to the area and in fact we're coming once again this summer for backpacking on the Continental Divide Trail.
2741	As a child I spent countless summer days hiking and camping in the Uncompahgre wilderness. It is the most beautiful, pristine, and wild part of Colorado. Now, as a parent with two daughters of my own, we return to Colorado, and to that part of the state specifically, to give our daughters the opportunity to experience wild places at their best and most beautiful. This land needs to be preserved for their children as well.
2744	As a hiker and camper I have thoroughly enjoyed my family visits to the Uncompahgre
2759	Almost 30 years ago, my son and I hiked to the summit of Uncompahgre Peak. It remains, for both of us, a peak father-son adventure in several senses of the word. I want future generations to have a chance for the same kinds of adventures.
2810	National Visitor Use Monitoring Program: The Moab Field Office completed a National Visitor Use Monitoring Program (NVUM) as a pilot project for visitor use monitoring on BLM lands. The NVUM for the Moab Field Office was developed through an interagency agreement with the Forest Service to be useful, in part, for making decisions during the planning process. BLM's website on the program explains the NVUM's relevance and applicability: Such visitor monitoring information enables BLM to incorporate statistically valid visitor use monitoring information into planning and management decisions as well as long-term monitoring assessment. The FS NVUM system provides BLM with accurate data with high confidence levels for reporting to Congress and constituents, thereby building credibility and establishing legal protection in decision-making. BLM, Visitor Use Surveys &Research, http://www.blm.gov/wo/st/en/prog/Recreation/nationalrecreation/visitorusesurveys.html. The information provided from the NVUM shows that motorized use is a small portion of recreation activity on public lands in the Moab Field Office. The NVUM states: "In terms of total participation, the top five recreation activities of the visits to the Moab Field Office were viewing natural features, hiking/walking/trail running, relaxing (hanging out, escaping heat and noise), viewing wildlife and driving for pleasure (Table 16)." The Uncompahgre Field Office should conduct a similar survey in preparation of the RMP. If the UFO also finds that quiet-use recreation is the most prevalent type of activity on public lands within the field office, it should ensure the RMP reflects that finding and adequately accommodates quiet users.
2811	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,

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	will not be designated in RMP revisions." 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 Uncompahgre Field Office. The Forest Service Travel Management Rule (36 C.F.R. § 212.51(b)) provides, in relevant part: 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). 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 provides, in relevant part: 2. [This authority] should be used sparingly to avoid undermining the purposes of the travel management rule and to promote consistency in its implementation. 4. Responsible officials should consider providing designating [sic] routes to dispersed camping sites as an alternative to authorizing off-route use... 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: 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 b) Motor vehicles may access signed campsites via designated camp spur routes that are signed and demarcated on a travel management map. In certain places or certain times, the BLM may need to restrict dispersed camping altogether. These provisions should be incorporated in the Uncompahgre RMP. We recognize that the Uncompahgre Field Office has recently become a leader on this issue and we commend the UFO for the dispersed camping policy established in 2009 in the Dry Creek TMP. The Dry Creek EA seemed to describe the situation clearly and due to this established a very strong and well-supported policy. For example, page 184 of the EA stated: Off-Route Parking, Camping, and Game Retrieval Policy: For BLM Public Lands and National Forests the distance that OHVs are currently permitted to drive off existing or designated routes for parking, camping and game retrieval is 300 feet. This regulation applies generally to most BLM and Forest Service-managed lands, with the exception of developed recreation facilities and other areas of concentrated use where parking or camping is restricted to designated parking areas and camping spurs. Due to higher levels of public use on the Public Lands and National Forests, BLM and Forest Service managers are concerned that the longstanding 300 foot regulation is outdated and no longer provides adequate protection of vegetation and other resources. One of the major concerns with the 300 foot regulation is that new routes are often created through repeated use, and these new routes in turn become the starting points for additional 300-foot long or longer extensions. As a result of these concerns, both the Forest Service and BLM are revising their regulations to decrease or eliminate the distance that motor vehicles can legally drive off routes to park, camp, and retrieve game.) The Dry Creek Record of Decision CO-150-2008-33 EA, Page 3, states: Parking In order to minimize resource impacts and help prevent new user-created routes, users are allowed to park motorized or mechanized modes of travel immediately adjacent and parallel to available designated routes for any purpose. Parking is limited to one vehicle-width from the edge of the route. Users are encouraged to park motorized or mechanized modes of travel in already disturbed areas whenever possible, consider safety, and keep routes passable for other users. Camping Short spur routes leading to popular dispersed campsites are designated and identified. Dispersed camping is allowed in other areas, consistent with parking requirements described above. We fully support this policy and therefore request that this policy be carried over on the entire Uncompahgre Field Office in this RMP. The Dry Creek EA acknowledges the many impacts to resources associated with routes created for dispersed camping. The RMP should not ignore those impacts which BLM already found to be significant and lasting; the RMP should assess those impacts field office-wide and take comparable steps to mitigate them.

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2812	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.
2813	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 Uncompahgre Field Office. Many portions of Uncompahgre 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 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.
2814	Guidelines for Managing Access between BLM and Private Lands: Attached to these comments are guidelines that have been adopted by the Royal Gorge Field Office and endorsed by the BLM's Front Range Resource Advisory Council. The guidelines 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 Uncompahgre RMP.
2816	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 Uncompahgre Field Office. The BLM Handbook on Recreation Permit Administration (H-29301) 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-29301 at 17. The Uncompahgre 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.13 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 Uncompahgre 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. 13 Analysis of the Impacts of permits on a cumulative basis Is also best accomplished in the RMP, since it will provide for a more

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	comprehensive, Informed analysis that can look at both cumulative and site-specific environmental consequences, as required by NEPA.
2817	Criteria for Addition of New Motorized Trails: In order to ensure that priority ORV management is addressed, the BLM should implement a prioritization hierarchy in which new construction is secondary to and incumbent upon successful restoration and prior achievement of other ORV related management goals. Management activities such as restoration and rehabilitation of existing impacts, signage and achieving compliance should take precedence over approving new motorized construction or adding motorized system trails that further increase the agency's management burden and might further retard other resource actions that are critical if not addressed first. The goal of this priority hierarchy is to 1) take care of the resource impacts from past ORV related activities; 2) establish conditions to prevent new and/or reoccurring ORV related impacts; 3) secure long term commitments, stipulations, and thresholds of new and existing system routes; and (4) once above priorities have been met, new proposals can be considered and reviewed through NEPA. Thus, in assessing whether additional motorized trails are to be considered, and if appropriate, approved, we recommend the following set of principles which builds upon the Royal Gorge Field Office's criteria set out in the Arkansas River Travel Management Plan Environmental Assessment, Appendix 6 (pp. 225-227). To provide for appropriate motorized uses, while also protecting the area's resources, the BLM should establish the following criteria for addition of new motorized trails to help guide future management and development of the ORV activities on the Uncompahgre FO: Approve construction of new or additional trails only after the following conditions have been met: a. The decision to approve the trail(s) has been authorized under a site specific EA or EIS that analyzes the site-specific environmental effects of the proposal. b. The proposal would further the goals and desired future conditions (DFCs) identified by the agency. c. Priority implementation of effective on-the-ground closures (Le. barriers, gates, berms) and restoration work (i.e. ripping/seeding, decommissioning, re-contouring, re-vegetation) has been completed and adequate funding and grants, partnerships/volunteer commitments, staff time allocations has been secured and employed. d. Implementation of all necessary signage (for closed and open routes) has been fully installed and adequate funding and staff/volunteer time for installment has been committed to. e. 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. f. The proposal is accompanied by long-term commitments, and stipulations and thresholds are agreed to that if surpassed, corrective management actions will be taken to protect resource health. 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. With the participation of cooperating partners, establish a system and procedures for monitoring trail conditions and performing necessary maintenance work. Continue and strengthen long-term partnerships with motorized user groups for the purposes of maintaining existing trail networks. Note that new construction does not include incidental construction in order to reroute, mitigate, and/or prevent resource impacts as this would be included under number 1 (c); rather, this refers to new ORV opportunities that are considerable and are added to the current system and agency burden. This approach is consistent with the letter and the spirit of BLM's obligation to minimize impacts from ORVs to other users and resources. As discussed previously in these comments, Executive Orders (EO No. 11644 (1972) as amended by Executive Order No. 11989 (1977)} and the BLM's regulations (43 C.F.R. § 8342.1) require BLM to ensure that areas and trails for off-road vehicle use are located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability; to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands; and to minimize distress and other impacts to wildlife.
2818	Recommendations: In managing recreation on the lands of the Uncompahgre Field Office, the RMP should

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	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 Uncompahgre BLM lands.
2819	In the Uncompahgre 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 Uncompahgre 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 their lands from other uses and activities that will destroy the undeveloped recreation setting and experience. 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. 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 Uncompahgre Field Office, particularly for portions of the 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. 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

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	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. 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.
2820	Preserving the "Backcountry" recreation setting One of the factors the BLM uses to determine setting prescriptions is "distance from an improved road," or the "remoteness" criterion 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. We have noticed a tendency for "distance from a road" to be justification for classifying an area as 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. Like many Colorado BLM lands, the Uncompahgre 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-fulfilllng 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. 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. 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. 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. 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." 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. Setting motorized use levels through permits, in desired but overcrowded settings such as rocking crawling areas and other intensive motorized use areas in Dry Creek, should not be ruled out. This recommendation applies not just to places where motorized use is occurring under a formal Special Recreation Permit, but to areas where general public use is occurring not under any permit. 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

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	absorb increased demand.
2821	Managing promotion and marketing: A key aspect of implementing SRMAs is marketing (H-1601-1- Land Use Planning Handbook, Appendix C, pp. 15-17, Recreation and Visitor Services, C, 4). Experience shows that designating new trail systems and other recreation opportunities can lead to unanticipated increases in use, potentially straining BLM resources and shifting less crowded settings into more crowded ones. The 2007 State Recreation and Visitor Services Strategy points to the inconsistency between the "recreation tourism demand" generated by a "vigorous Colorado Tourism Office promotion budget" and the BLM's "fundamental duty to meet or exceed land health standards" (p.6). The Recreation Strategy goes on to state: "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, both Appendix C of the LUP Handbook and the State Recreation Strategy direct the BLM to manage marketing so as to maintain targeted recreation settings. For example, the SRMA definitions section in Appendix C includes "appropriate restrictions on marketing" as one of several implementation actions to be done on SRMAs. Objective 2 in the Recreation Strategy similarly calls upon businesses and local governments to "agree" to the BLM's "approved recreation setting prescriptions and management objectives" and to "market public lands responsibly" (p. 9). For example, the Glenwood Springs Field Office, has obtained an agreement from local government to limit marketing efforts to ensure its Community SRMAs do not evolve into Destination SRMAs. The Recreation Strategy further directs BLM field offices to "engage the business community and local governments in .....managing....use of public lands that meet or exceed land health standards" (p. 9). Recommendations: In accordance with this direction, we recommend that the Uncompahgre 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 are manageable within budgets, and 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 SRMA or other recreation area.
2822	Areas needing special attention to recreation management. In addition to designating new SRMAs and protecting lands with wilderness characteristics in accordance with our separate proposals, certain areas in the Uncompahgre Field Office merit special attention for management of recreation. At this time, we would like to highlight the following areas: • Adobe Badlands: The lands immediately adjacent to the Adobe Badlands WSA and citizen-proposed wilderness area are severely degraded by intense motorized use, causing noise and dust pollution and impacting the WSA. The revised Uncompahgre RMP should give special attention to managing this area to reduce and minimize impacts to the WSA or the citizen-proposed wilderness from motorized vehicles. • Tabequache: The Tabeguache area managed by the Forest Service was congressionally designated to protect its Wilderness values. The BLM should close motorized and mechanized routes in the adjacent BLM lands in order to avoid motorized or mechanized intrusions into the Tabeguache area and to otherwise ensure preservation of the wilderness values there. Specifically, the relatively unroaded, unmotorized BLM lands north of the Tabeguache Creek Special Management Area, including the Shavano, Campbell, and Burro Creek drainages, should be closed to motorized recreation. • Roubideau: The Roubideau Area managed by the Forest Service was congressionally designated to protect its wilderness values. The Uncompahgre Field Office closed a deteriorated jeep trail in the Monitor Creek area, creating a large contiguous area adjacent to the FS Roubideau Area, covering over 20,000 acres on BLM land which includes the Camel Back WSA and citizen-proposed wilderness. The RMP should reaffirm this closure and manage recreation in this area to protect natural values.

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2794	BLM must manage oil and gas development in a way that retains special status species and moves them toward recovery. As we have noted in our citations of FLPMA and the BLM Manual above, the BLM has a mandate to conserve imperiled species. The agency cannot prioritize oil and gas drilling or recreation at the expense of meeting its duties toward special status species. This includes all aspects of oil and gas development and off-road vehicle use - the BLM must ensure that its authorized activities do not 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 (all phases, including leasing, exploration, infrastructure construction, drilling, and reclamation) 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.
2801	Travel management decisions should be made in the RMP. BLM's internal guidance states that "each RMP will divide planning areas into OHV area designations that are open, limited or closed." IM 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. H1601, Appendix C, Section 11.0 (Comprehensive Trails and Travel Management). The Land Use Planning Handbook states that BLM should: 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) Furthermore, Colorado IM No. CO-2007-020 directs Colorado BLM Field Offices to complete comprehensive travel management plans as part of the RMP process: 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 0, 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. 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: • 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 • 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.
2802	We understand that BLM is not planning to complete comprehensive travel management planning as part of the Uncompahgre RMP revision. We also note that the Dry Creek area has a travel plan in place, and the Field Office-wide travel plan for the remainder of the field office is in progress. In this context, we would like to provide comments for travel planning to be incorporated in the RMP, as well as comments for the future comprehensive travel plan. The Land Use Planning Handbook provides guidelines for addressing travel planning in the RMP even if comprehensive travel planning is deferred. Appendix C, pp 18-19 states: If the final travel management network is to be deferred in the RMP, then the RMP should document the decision-making process used to develop the initial network, provide the basis for future management decisions, and help set guidelines for making road and trail network adjustments throughout the life of the plan. The identification of the uncompleted travel management networks should be delineated in the land use plan and the following tasks completed for each area: 1) Produce a map of a preliminary road and trail network; 2) define short-term management guidance for road and trail access and activities in areas or sub-areas not completed; 3) outline additional data needs, and a strategy to collect needed information; 4) provide a clear planning sequence, including public collaboration, criteria and constraints for subsequent road and trail selection and identification; 5) provide a schedule to complete the area or sub-area road and trail selection process; and 6) identify any easements and rights-of-ways (to be issued to the BLM or others) needed to maintain the preliminary or existing road and trail network. If the decision on delineating travel management networks is deferred in the land use plan to the implementation phase, the work normally should be completed within 5 years of the signing of the ROD for the RMP. Colorado IM 2007-020 further instructs that: "limited to existing roads, primitive roads and trails" designations should be used only as an interim measure prior to your next scheduled RMP revision. Where the Field Offices choose an interim designation of "limited to existing roads, primitive roads and trails", a map showing the existing travel and transportation network is required. • An inventory and map of roads, primitive roads and trails is necessary to assess and evaluate the need for individual routes as part of the travel and transportation network. • Without baseline inventory the Field

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	Offices will not be able to confirm and document when new routes have been created or adequately monitor resource conditions. Baseline inventory maps are essential to effectively respond to the issue of user created route proliferation. • Inventory and baseline data is needed to provide supporting rationale to justify management actions such as closures and rehabilitation of routes created after the interim designation is made. • The BLM needs to provide the public clear and consistent information regarding access opportunities and provide a map showing the location of existing roads, primitive roads and trails that are available for public use and access. The Uncompahgre RMP must set out the process that will be used to complete a comprehensive field office-wide travel management plan. The RMP should also provide a baseline route inventory and use that data to institute road closures that cannot wait until the full travel plan is completed. The RMP should also set travel management prescriptions for special management areas, such as lands with wilderness characteristics and ACECs. The Little Snake Field Office did not complete comprehensive travel planning as part of its recent RMP revision; however, the RMP (available online at http://www.co.blm.gov/lsra/rmp/index.htm) identified priorities for sub-regions to receive comprehensive travel management planning, which can also be useful for guiding implementation. Appendix F of the Little Snake Draft RMP (attached) sets out criteria for prioritizing areas to receive comprehensive travel management planning, including: • Special management areas • Areas identified as "limited to designated roads and trails" • Areas that meet fragile soil criteria • User and resource conflicts • Excessive complaints • Wildlife/wild horse population trends • Evidence of trail/road proliferation • Areas with high road densities • Impacts on cultural resources • Unacceptable erosion • Degradation of water quality • Impacts on visual resources • Loss of trail integrity • Habitat fragmentation and damage • Impacts on sensitive plants • Need to provide a variety of user experiences We encourage the Uncompahgre RMP to prioritize areas in this manner. One additional type of subregion that should be prioritized for travel planning is areas with low road densities that have the potential to be managed as primitive, backcountry, nonmotorized wildlife or quiet use areas. The RMP should identify specific areas that will be prioritized for travel planning and establish time commitments for completing each specific area, in addition to the S-year deadline for completing travel planning for the entire field office. Travel and recreation planning are inextricably linked, and recreation planning decisions affect travel planning (and vice versa). The comprehensive travel plan for the Uncompahgre Field Office must be coordinated with recreation planning efforts in this RMP. Recommendations: The Uncompahgre RMP should establish the methodology for comprehensive travel planning, establish interim travel management, and identify priorities for completing travel management planning. Special management areas, such as ACECs, special recreation management areas and citizen-proposed wilderness, will include travel designations within their boundaries. 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.
2803	2. Landscape level planning. Travel planning requires the agency to manage human travel across the landscape. The land use planning process, which addresses the broader landscape within a planning area, provides one of the best opportunities to make travel planning decisions in the appropriate context. While we understand that BLM does not have authority to close or relocate highways, major roads, or County roads, BLM must include these routes when analyzing the transportation network as they have a great impact on habitat fragmentation and reduction in core area size (discussed in length later in these comments and in Appendix 1). The placement and design of travel routes defines which areas will remain or become roadless, and which areas will be disturbed and how. In other words, route decisions determine the fragmentation of the landscape, and, thus, how naturally or unnaturally a landscape will behave in terms of water flow and quality, wildlife migration, and species composition and function. NEPA requires federal agencies to assess the direct, indirect and cumulative environmental impacts of proposed actions, taking a "hard look" at environmental consequences and performing an analysis commensurate with the scale of the action at issue. 42 U.S.C. § 4321 et seq; 40 C.F.R. § 1508.8; see also Metcalf v. Daley, 214 F.3d 1135, 1151 (9th Cir. 2000); Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 348 (1989). Travel planning affects the entire landscape and can only be thoroughly and properly assessed by considering potential impacts and making decisions at a comparable level. In terms of how to evaluate the potential impacts of travel management decisions, NEPA's definition of "cumulative impact" is instructive: the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. 40 C.F.R. § 1508.7. (emphasis added). BLM must account for the direct, indirect, and cumulative impacts of all roads in the Uncompahgre Field Office when completing a comprehensive travel management plan. Recommendation: BLM should address travel management on a landscape-wide basis by addressing the impacts of all roads in the

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	planning area and accounting for the landscape-wide impacts of these roads.
2804	3. Mapping of routes. As part of comprehensive travel management planning, we anticipate that BLM will produce route maps to illustrate a base travel network, to generate various route designation proposals, and for purposes of receiving public comments. In these contexts, it is vital that the agency clearly mark on all maps or proposed maps areas with existing restrictions on motorized use, such as: wilderness areas, WSAs, primitive non-motorized designations, Wild and Scenic Rivers, and ACECs. Depicting existing restrictions will ensure that public comments are informed by the knowledge that additional routes will not be permitted in certain areas. Further, maps should indicate resources that could be affected by motorized use, such as wilderness characteristics and wildlife habitat. Public comments will then be informed by the potential resource conflicts and the best opportunities for designating areas for non-motorized recreation. Route maps should also distinguish user-created routes from roads that were created and are maintained by the BLM to serve planned transportation needs. Also, user-created routes in areas that have motorized restrictions should only be shown as closed and/or for prioritizing restoration. To be added to the transportation system, user-created routes must go through NEPA analysis to ensure they are not damaging resources and comply with BLM regulations, such as the minimization criteria for ORV use discussed in these comments. In addition, as part of designating routes, BLM should use consistent definitions of roads, primitive roads, and trails. 1M 2006-173 ("Implementation of Roads and Trails Terminology Report"), sets out and defines these terms, and includes a definition of a road as: A linear route declared a road by the owner, managed for use by low-clearance vehicles having four or more wheels, and maintained for regular and continuous use. It is important that BLM use these terms to distinguish both the types of routes and the appropriate types of motorized use. Recommendations: 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. User-created routes should be distinguished from legitimate roads on travel planning maps, and, where they were created illegally, should be excluded from the baseline inventory.
2805	4. Habitat fragmentation. As mentioned in the beginning of this section of our comments, BLM must address travel management on a landscape level to ensure that BLM meets its responsibility as stewards of the public land and mitigates against habitat fragmentation. We have included "he Wilderness Society's recent Science and Policy Brief, "Habitat Fragmentation from Roads: Travel Planning Methods to Safeguard BLM lands" (Appendix 1). Also included in Appendix 1 are four scientific reports prepared by TWS and discussed in the habitat fragmentation report. These include Fragmenting Our Lands: The Ecological Footprint from Oil and Gas Development, Protecting Northern Arizona's National Monuments: The Challenge of Transportation Management, Wildlife at a Crossroads: Energy Development in Western Wyoming, and Ecological Effects of a Transportation Network on Wildlife. In addition to summarizing the four reports included, "Habitat Fragmentation from Roads: Travel Planning Methods to Safeguard BLM Lands" provides a summary of available scholarly and government reports and studies on the impact of habitat fragmentation on wildlife, provides methods for calculating habitat fragmentation, and provides recommendations on how to integrate fragmentation analysis into travel management. We also recommend you look at the travel planning criteria set out in the Record of Decision for the Dillon (MT) RMP (relevant sections attached and also available on-line at: http://www.mt.blm.gov/dfo/rod/contents.htm). as an example of criteria that incorporate key aspects of BLM's ORV regulations as well as ecological metrics. This field office did not complete a comprehensive travel management plan as part of its RMP revision; however, it included road density targets and included an appendix outlining the principles it will use when completing a comprehensive travel management plan during implementation. The Uncompahgre Field Office should adopt a similar approach. Recommendation: BLM should use the information provided in Appendix 1 to measure habitat fragmentation, conduct a thorough fragmentation analysis, and inform decisions regarding road closure and other limitations on use in the Uncompahgre RMP. Specific fragmentation analysis can be done as part of the future comprehensive travel plan; route density targets and roads in need of immediate closure should be addressed in the RMP.
2806	5. Principles of travel management. When completing a comprehensive travel management plan, it is vital to complete it in a systematic and transparent manner. Key principles of travel planning (1) Travel management is part of land use planning and should address both recreation and transportation needs from a landscape perspective; therefore, travel planning must be coordinated with recreation management planning. (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 or misrepresent the official status of the existing network of unauthorized

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	ways/routes 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. 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 RMP revision and future comprehensive travel plan provide opportunities for BLM to evaluate its travel system goals and whether the current system of roads and trails is furthering or hampering these goals. BLM should create a travel network that best serves the many resources which the agency is tasked with managing and does not inadvertently do a disservice to any other resource or public land visitor. 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 RMP as the process for future travel planning. Recommendations: BLM should follow the eight travel planning principles detailed above to ensure that only routes which truly serve a valid purpose for the public remain open. BLM should also create comprehensive travel and recreation management goals and designate routes accordingly.
90	Not only is the access useful for oil and gas exploration and production it benefits other resource uses such as 4-wheeling, mountain bike riding, snowmobiling, coal mining and timber harvest to name only a few. Basically, the closure of roads and off road access is not considering multiple use of the many resources in the Resource Planning Area. GEC encourages a strong multi-resource approach with the new Plan.
125	TMW ATV club fully supports the concept of the transformation from "ride anywhere" to "designate trails". Our paramount concern with the implementation of the new concept of public land resources is the inventory of current and existing OHV trails and Jeep roads. The long lasting effect of an accurate and complete inventory is essential in the success of future Travel Management Planning (TMP) in the upcoming specific areas.
126	TMW would like to re-visit the complications of substantive public input created by the BLM on the Dry Creek TMP when the trail numbers were left off the public maps presented to the public for comment. This omission substantially hindered the ability of the responding public to accurately submit proper and meaningful input. Please consider such in the RMP for such action in the future.
127	Motorized OHV travel on the UFO has a verity of user groups ranging from standard passenger vehicles driving on maintained roads to off-highway vehicles (OHV's) traveling on primitive roads and specialized trails. Present day there is little to no signage of such routes making it very confusing for the traveling public. TMW encourages the proper posting of RMP/TMP results immediately on completion of the appropriate process.
128	OHV travel is an integral part of virtually every activity that occurs on BLM public lands. Many anti-motorized user actually use either full size vehicles or OHV to gain access to the non-motorized areas. TMW strongly suggests that during the RMP the planning team have a high priority on establishing a true and accurate inventory of existing trails, roads, and pathways.
129	There is a multitude of HISTORIC routes throughout the UFO management area. TMW asks that the RMP team accurately GPS the existing travel routes and be aware of these treasured travel pathways and pre-plan your future TMP to reflect such concerns. An accurate inventory is of existing trails is paramount it public input. One of the most contentious OHV issues generally comes from the removal of a HISTORIC route from the designated OHV inventory.
130	With the continued onset of housing developments and private property in the low regions of BLM lands we ask that the RMP planning team take special note of areas that are open to motorized use, but are only accessible thru private property. Generally this has created user-created routes starting from existing routes and sometimes causes unnecessary resource damage. Pre-planning allowing access would be fruitful in the RMP/TMP process.
141	We strongly suggest for future planning purposes during and after the TMP process, the BLM take a page from the Forest Service's travel management local initiative of the District Rangers and have quarterly meeting with the OHV community. These meeting have been invaluable in continued collaborative relations and successful in understanding and acting on both parties concerns. This has provided the vehicle to get the travel management decisions implemented and then collaboratively address site specific situations or concerns.

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161	The Tabeguache Trail is a valuable corridor. By connecting Montrose to Grand Junction on a historic route the trail is a centerpiece of the backcountry in south west Colorado. It is used by all means of backcountry visitors. It should remain open to all.
169	First is the fact that the Colorado OHV program has grown from 55,000 registrations in 2000 to 133,000 registrations in 2009. With the amount of growth within the public wanting to recreate in this area utilizing off road vehicles it would make sense to me that our public land manager would recognize the demand and carefully plan for this increase by providing better access and more loop system trails for this growing demand.
170	There exists a multitude of historic multiple use routes throughout the UFO management area. I believe the OHV community deserves the RMP team accurately GPS all existing travel routes. An accurate inventory of existing routes is paramount towards the outcome of multiple use routes being evaluated. The most contentious OHV issue comes from the removal of any historic multiple use route without any justifiable scientific bias.
173	I really appreciate the fact the RMP is looking at recommending the Adobes north of Delta as an open multiple use area. I adamantly commend the BLM for seeing the value of this type of multiple use for the future. I'm proud to share this Adobe land with the county landfill and look forward to sharing it in the future.
177	I live in a suburb of Denver yet ride all over the state and look forward to riding peach valley in Montrose. Unless its closed for OHV use.
203	I recommend a travel management plan and the creation of managed, new single-track trails in these areas (Unit 3).
207	The BLM should actively solicit input and involvement by the Montrose Economic Development Council, the Montrose Chamber of Commerce, and the Montrose Visitor's and Convention Bureau. These organizations should more actively promote the recreational opportunities near Montrose, which would encourage sustainable and economically beneficial uses.
215	I am a mountain biker and I want to see more trails designated and protected as single track. There are no trails that I am aware of that are both single track, and non-motorized currently in the UFO. I would like to see some non-motorized single track. The Grand Junction area has many miles of non-motorized single track on BLM land, but we don't have any. I like being on trails with other non-motorized users. We like the quiet experience, the slower speed, the lack of exhaust in the air, and less disruption to wildlife.
217	My main concern is that we have more single track trails, with some of them being non-motorized.
218	Regarding single track trails, they should not be intensely developed. We will need trailheads with parking and restroom facilities, but a well built single track leaves a minimal scar on the land and is sustainable. If properly constructed, it shouldn't either cause erosion around it or provide a pathway for erosion within it.
227	Where appropriate, agencies should work together to identify trail systems where it makes sense to incorporate areas of different jurisdiction, rather than planning such systems only on one agencies jurisdiction.
231	Seek out other agency comment when considering trail systems near those agency's lands.
253	Travel management- Reclamation's operations and maintenance roads and interior park roads should not be included as public travel routes without Reclamation's concurrence. Also, Reclamation lands are closed to off-highway vehicle (OHV) use until special areas or trails are specifically opened for OHV use by Reclamation through a public involvement process.
279	The area included in the RMP boundaries contains some fantastic "wild places". In a West that continues to urbanize and develop rapidly, these places (especially those outside of the rocky mountain ridges that often fall under USFS jurisdiction) are increasingly valuable. I would like to see an end to further road construction; better designation of OHV use and non-use areas; the elimination of non-renewable energy development and careful consideration of the footprint associated with any renewable energy projects such as solar or wind installations; and continued maintenance of facilities such as the (very much appreciated) picnic/camp areas on the San Miguel.
320	issues/concerns? road closures
339	Saltado Creek Canyon is a spectacular steep sided, deep and wild canyon adjoining the San Miguel River canyon. It is the only major tributary canyon/stream to SMR that has no roads or bridges. It is a key wildlife corridor connecting Uncompahgre Plateau to the Delores Mountains and wilderness areas to south. The current level of access should be maintained and no further development of access should occur. It should be designated a "wild" river section as proposed in the WSR Eligibility Report. Hunting and grazing should be maintained with the

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	possible exception of better protection for riparian habitat from cattle. No motorized access, other than emergency vehicles or maintenance, should be allowed. This area should be managed with wildlife being the predominant management goal. It is also prime Lynx habitat.
355	Maintain the following policies on OHV restrictions: Designations of OHV areas is primarily directed at maintenance or restoration or riparian areas and scenic values. Roads will be designated at the time the activity plan for the SRMA is developed. Beaver Creek Canyon, Saltado Creek, and the San Miguel River Canyon from the Sanborn Park road to Horsefly Creek, would be closed to off-highway vehicles. The access road in lower Beaver Canyon must remain usable for utility line maintenance, but would be closed to public vehicle use. Within the remainder of the ACEC, vehicle use would be limited to designated roads or trails. Designation of the roads to remain open will occur in the Recreation Area Management Plan (Integrated Resource Management Plan).
378	Closing roads or areas from being used is not right.
381	Roads that have been in use for many years should be left open.
383	Relative to Issues 1, 3, 4 and 5 it is suggested that access to the Uncompahgre Planning Area be limited to existing roads and trails. No new roads should be created . This approach will protect vegetation and help to preserve the extant terrestrial and aquatic habitat, as well as minimizing the potential deleterious effects to the water resources as a result of potential increased human access or use of the area. This approach will also assist in managing the human activities in the area, as well as defining permissible lanes of travel in the utility/energy corridors while still permitting public and commercial access and use of the Planning Area.
397	The following describes an area that at the present time does not have any roads. The Dolores River Canyon is a pristine slickrock desert canyon area. I bring this area to your attention because on two visits this fall to Coyote Wash we found motorized vehicle tracks at two locations. We hiked into Coyote Wash from Silvey's Pocket and were surprised to find a vehicle had driven all the way into Coyote Wash and then up the wash. It may have been a Hummer gauging by tire tracks. The signs at the wilderness boundary are knocked down. It may be possible to barricade the side canyon to stop motorized travel. A second visit to the area was from Wray Mesa. We walked down a side canyon to Coyote Wash and found tracks from a motor bike. Access may have been gained via Utah where a road crossed the wash. Uranium mining in the area may be part of the problem. Montrose County reopened several of the roads in the area, which had become impassable due to disuse. The county spent several days doing road work on Wray Mesa and in other Uranium mining areas.
402	There are several locations where native art work can be found along La Sal Creek and along the Dolores River. One large rock has a good number of dinosaur tracks near the trail. I have a difficult time recommending any type of wheel travel in special areas but this is an exception. Bicycling could be made possible if a few small bridges could be placed across the La Sal Creek. Hikers could use these bridges also. Some bridge design would be needed to keep out motorcycles. Many hikers are discouraged because of the stream crossings. Bridges would increase hiker use. Bicyclers could do a round trip. Hikers would need to make other arrangements as a round trip would be nearly 20 miles.
404	If public lands are going to maintain both animal and plant diversity, management is critically important. We need to be closing roads not making new ones. We need to be protecting water sources, springs, streams and rivers. We need to return to a more natural rhythm in fire control.
408	Mining and roads are a threat. If the Uranium mill is not built mining will never return to its former days. If it is then we need to brace ourselves for a big increase in population, lots more motorized vehicles and a lot more roads, mostly unofficial. Just look to what has happen in Mesa, Delta and the east end of Montrose counties. Our saving grace has been little increase in population. High gasoline prices have kept a lot of off road vehicles a little closer to home and away from western Montrose County.
410	I have concerns about the illegal closing of access roads and trails in certain areas of our public lands.
414	As far as physical changes to the landscape of our public lands is open up all the access trails and roads and maintain them instead of sitting at a desk wasting or tax dollars on regulating our public lands through a management plan to keep us off the recreational land.
423	Issues/concerns? Travel plans.
427	Definite limits on all motorized travel & to some extent motor biking- except on designated routes carefully signed and enforced- consider use of a crime stoppers regimen.

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437	The valley wants more connecting/destination trails. I share this view. I don't want to close trails.
444	As you know, there is a growing network of social trails that are being created by hikers and bikers in on the south slope of Jumbo Mt. near town. Ideally, those trails will get formalized with proper signage, easements and liability covered.
445	We also need to develop some trails appropriate for hiking/walking that are separate from the bike trails. Currently, many people walk on our road (a private road) because it is of a gentler grade and is an all weather access. We also need consideration for horseback riders.
448	Those access points should be separated by distance and topography so that the activities do not conflict.
455	ORV and other motorized activities should be strictly monitored and encouraged to operate in specifically defined and limited zones. All efforts should be made to keep the backcountry in a primitive state.
484	If mechanized or motorized equipment has been historically used and significant off-road damage to the resource has not occurred existing forms of access should not be restricted.
487	I'm also concerned about the vulnerability of roadless areas, and encourage you to limit expansion of trails for off-road vehicles, and any additional roads in public lands.
505	Regarding motorized recreation: Since there is likely to be a serious amount of lag time between the announcement of "limited to existing" and specification of designated routes, the BLM should actively close all damaging routes in sensitive ecological and riparian areas, as well as sign, close and barricade any new user created routes in the Field Office jurisdiction which have come into existence since the initial announcement
506	Preserve the less roaded areas of the UFO which can serve as intact and undisturbed wildlife refuges especially those which are adjacent to already established Wilderness Study Areas (WSA) and Special Management Areas (SMA). Specifically areas adjacent to Dominguez Canyon Wilderness, the Adobe Badlands, the Dolores River Canyon SMA, as well as Norwood Canyon.
509	The RMP should mitigate the effects of noise pollution from OHV so as not to impact wildlife and quiet users. When establishing OHV routes consideration should be given to the effects of vehicle noise pollution in adjacent areas set aside for wildlife habitat, hiking, birding and horseback riding.
516	We have been the victims of trespassing, poaching of elk on our ranch, and motorize traffic tearing up our access roads. A significant amount of private investment, in the form of grading and addition of gravel, was made in this road in 2001 to make the road more passable. Since then the roads have been rendered impassable during wet weather by motorized vehicles gouging tracks and ruining the drainage. In addition, motorized vehicles have failed to stay on the marked roads and have torn up the under-story vegetation on top of Monitor Mesa and near the Lee Bench Reservoirs.
518	We are opposed to improving motorize vehicle access in this area and would prefer to close many side roads in this area and limit the access to areas that have been subject to abuse, including Monitor Mesa as well as our irrigation structures, including the Lee Bench Reservoirs.
524	A trail for pedestrians could help restore the logging damage and give the public access to a wonderful canyon experience.
526	Off-road vehicle access should be more closely controlled. We have witnessed significant destruction of terrain due to irresponsible ATV travel. The principle of no access to an area unless specifically designated as open should be applied Areas should be clearly designated and rules enforced as much as possible. This would also prevent intrusion of vehicles into existing roadless regions and reduce the negative effect on wildlife.
531	While we have done excellent work to improve habitat conditions and productivity of our public lands, I feel there is a great need to reduce the impact of indiscriminate OHV use on BLM lands. The GMUG National Forest spent 6 years conducting travel management planning for the Uncompahgre NF. Since the 2002 travel plan decision was signed I have spent much of my time implementing that decision for the benefit of our big game species. I would really like to see the UFO implement similar actions on your public lands that will further enhance wildlife habitat and provide non-motorized opportunities for the public.
533	In general, I recognize the need for BLM to provide a spectrum of motorized and nonmotorized recreational opportunities on public lands but the BLM needs to demonstrate that those uses are compatible with each other and the resource values of the lands upon which those uses occur. I sincerely hope the BLM recognizes the values of unroaded, primitive backcountry areas with no motorized use and that you will provide areas within the UFO

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	that are managed for wildlife habitat effectiveness and security, backcountry hunting and recreation opportunities, and solitude for people. These areas should include, but not be limited to the five WSA's within the UFO.
534	Apparently your regulations require you to "designate all public lands as open, closed, or limited to OHV use". In addition, Colorado BLM policy is to "restrict all OHV use within limited areas to designated routes rather than designate areas as limited to existing routes".
535	I strongly support the continued designation of closed to all lands currently included in the five WSA's and portions of the San Miguel River and Adobe Badlands ACEC within the planning area. Additional closures should be designated for proposed ACECs, T&E plant or animal habitats, or environmentally sensitive areas included in the RMP.
536	I would like to see the UFO conduct an inventory of BLM lands that will identify areas of roadless or low road-density (< 1 mile per section) within the UFO and manage them as primitive backcountry areas with no motorized uses. The lands identified would be designated as closed to OHV's.
538	The BLM should also carefully evaluate the use of mountain bikes within these areas. Mountain biking is not a benign use free of any impacts. Just because they do not have a motor that does not mean they are entirely compatible with the land, wildlife, or people hiking or riding horses in the area.
539	One area that should be closed to motorized uses includes the upper Little Dominguez, Rose Creek, and Open Draw drainages, and the Camp Ridge and Sowbelly Ridge areas adjacent to the Dominguez Canyon WSA. Closing the entire Gunnison Trail and McCarty Trail systems to all motorized vehicles would provide an excellent horse and foot trail system that would compliment the Big Dominguez/Little Dominguez Canyon trails. Closing the area to all motorized vehicles and mountain bikes would provide solitude for people and wildlife, security for big game animals, and a large enough area for people to enjoy peace, quiet, and backcountry hunting opportunities.
540	Another area that should be closed to OHV's for non-motorized uses is the Monitor Creek, Potter Creek, and Criswell Creek Canyons adjacent to the Camel Back WSA. Closing the existing trails and old roads within this area to all motorized vehicles would provide an excellent backcountry area for non-motorized recreation and hunting. It would also compliment roadless values of the Roubideau Canyon Special Management Area on the adjacent Uncompahgre National Forest.
541	Another area I would strongly recommend for closure to OHV's are the BLM lands north of the Tabeguache Creek WSA/Special Management Area which include the Shavano, Campbell, and Burro Creek drainages. This area has very high wildlife values as well as excellent opportunities for non-motorized recreation and hunting.
542	The UFO has experienced several large wildfires in the last 20 years in the west end of Montrose and San Miguel Counties. You have done an excellent job of seeding and revegetating these fires. There were also several roller chops done in burned areas, old P/J chainings, and other sites to improve vegetation condition, induce mosaics for wildlife habitat, increase forage, and to reduce the risk of large-scale wildfires. Many of these projects have created or reestablished roads and OHV trails into areas that were previously inaccessible by motorized vehicles. During the time I have lived and worked here I have watched a steady progression of user-developed OHV trails become established in these areas that have opened up large areas that were previously inaccessible with four-wheel-drives and ATV's. The UFO needs to implement an active program of road closures to eliminate these routes and restore the benefits of the vegetation treatments as well as the hunting experience in these areas. The primary areas I know of are associated with the Burn Canyon fire, including Hamilton Creek, Hamilton Mesa, Callan Draw, Burn Canyon, and McKee Draw. Also the Campbell Creek fire opened up portions of Campbell Creek and Shavano Creek to motorized vehicles. The Bramiers Draw and Wickson Draw areas are additional examples. Another area that has been greatly altered is Mailbox Park.
543	The RMP should include management policy to immediately close fire lines and roads used to suppress wildfires, implement vegetation treatments such as roller chopping and prescribed burns, or for mineral exploration activities. When closing these roads and trails the BLM should leave a small parking area for pickup trucks and horse trailers to facilitate horse and foot access to the backcountry.
544	The BLM's travel management planning process should achieve a management designation of restricting all OHV use to designated routes within the remainder of the UFO. There is no reason to have any areas within the UFO designated as open to indiscriminate OHV use.
545	addition I would like to see the BLM institute seasonal restrictions on lands classified as big game winter range. The seasonal closures need to be coordinated with the areas currently restricted on adjacent National Forest

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	lands as depicted on the 2008 visitor map for the Uncompahgre National Forest. The seasonal closures apply to all motorized vehicles including snowmobiles. Big game winter ranges on the National Forest are closed from December 1 through April 15 each year, regardless of snow conditions. This seasonal restriction, in combination with vegetation treatments and proper livestock grazing use, is primarily intended to encourage elk and deer to remain on public lands. Specific areas within the UFO that should be seasonally restricted to protect big game winter ranges include the area associated with the Burn Canyon wildfire – Hamilton Creek, Callan Draw, Burn Canyon, McKee Draw and the Flatiron. Another significant big game winter range area is Dry Park and Little Bucktail Creek outside of Nucla. On the other side of the Plateau, seasonal restrictions need to be implemented on the Roat Cap, Monitor Mesa, and Dry Mesa portions of the UFO. These areas all provide big game winter range habitat that needs to be managed in coordination with the adjacent National Forest lands to reduce disturbance and stress to wintering big game animals and to enable them to utilize preferred winter range areas located on public lands.
546	Open public meetings and a systematic NEPA process should be initiated to determine which existing routes are clearly needed for resource management, private land access, utility corridors, irrigation ditches, etc. Recreational OHV trails should not be the focus of the subsequent travel plan nor dominate the use of the UFO. Unroaded areas, seasonal restrictions for management and protection of wildlife and to provide areas of solitude, backcountry hunting, and non-motorized recreational opportunities must also be included in the final decision.
547	In addition, one criteria that I would like to see the BLM utilize for travel management is that if monitoring or public input indicates repeated or chronic violations of authorized motorized use occur, those areas or trails will be closed and/or further restricted by the BLM. There is no reason to reward bad behavior or abuse of our public lands.
549	There should be an effort to reduce and eliminate OHV use within or adjacent to the WSA's to preserve the wilderness and backcountry character and values. In addition, I would like to see the BLM prevent the establishment of mountain bike trails within the WSA's and adjacent backcountry areas. I do not believe that mountain bikes are compatible with this primitive setting and use.
564	I'm 60 and as I get older I would think someday I'd rather be on an ATV than a Mtn bike so I feel for the motorized folks yet don't know how public access for them could be worked out. It seems the best solution for them would be some public access thru or on to the power line road. I understand years ago there was dirt road access from Minnesota Creek Road to the power line road through what is to become Whistling Acres Estates Subdivision, but initially they're saying this would be for lot owners only. Perhaps Arch Coal would give access thru their property off of Minnesota Creek Road.
565	But for now let's start by preserving the trails that are there and have been since 2000, 2001. The trails allow a person to walk without getting cheat grass in their socks and give good access for firefighting (Mtn Bikers have put out 2 lightening strike fires in the last few years).
566	The part of our property where a BLM trail joins it, is part of a 16 acre conservation easement with a building site on it and then the trail exits onto Hawk Haven Subdivision's property. So, what would enhance our single path places and make for a long-term outstanding recreational opportunity for mountain bikers and hikers would be for BLM management to sign and declare certain trails for non–motorized use and many of is can help this occur.
599	Restrict target shooting and motorized travel to specific areas.
615	I say this because just about everyone I know prefers a quiet soundscape of the remote back-country. As such, it would be a good idea to lessen or not increase the use of motorized vehicles.
616	As a mountain bike user of the Jumbo area in Paonia I would like to express my interests. I believe that some trails (single-track) should be closed to motorized travel.
626	I would ask that you give this matter your utmost consideration and attention. As a long-time snowmobile rider, I would submit that this requirement would effectively eliminate snowmobiles on BLM Lands. A majority of riding time is spent on wide open meadows and other kinds of terrain that are a challenge to ride. There is no challenge in riding along on a road, like you would in a car or pickup. Roads and a few trails are used to get to the riding areas-they are not a destination. Snowmobiles travel on snow--Rarely do they ever touch soil or waterways. In all the snowmobile rides we've participated in, there has never been any harassment of wildlife nor abuse of terrain. Such a regulation would eliminate 90% or more of snowmobile riding on BLM Public Lands. would encourage you to keep Public Lands open to the Public.

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631	In the interest of coexisting I would give them the ability to ride the Powerline road and the existing double track, But all of the single track should stay motor free.
655	In addition to the current RMP effort, Western is aware that the Uncompahgre Field Office intends to prohibit "open" travel and require that all motorized travel be limited to designated roads and trails. Western's only concern related to the limitation on off-road travel is that some of our access to the transmission line structures is off designated roads and would be considered off-trail travel. Western needs access to its facilities on a continual basis to properly operate and maintain them. We have geographic data that show the location of our facilities and access routes and can provide shape files so that this information is included in your travel management planning effort. We typically conduct our own road maintenance activities and can assist the Uncompahgre Field Office with the use, repair and maintenance of roads or trails used by Western to access its facilities. We can also work with BLM to identify areas where gates or other types of barriers can be used to restrict access for administrative purposes only.
682	As stated previously, San Miguel County believes the interests of the County and the public at large are best served by BLM lands maintaining their natural ecological integrity. Extractive uses of BLM lands have resulted in boom and bust cycles and left indelible scars on our public lands. Historic, and perhaps current, livestock management practices have also contributed to degrading or perpetuating the degradation of our public lands. These activities, along with travel management, have all contributed to the conditions described in the LHAs.
684	We also agree with the recommendation that BLM complete a road and trail map, identify road-caused soil loss, change travel (as you have) from open to limited to existing routes and where necessary, further limit travel to designated routes. As suggested in the LHA, BLM should close and rehab abandoned roads and trails to prevent further erosion.
707	My biggest concern for the revised Plan is how BLM will handle travel management, particularly motorized recreation uses, both on trail and off trail. When the Plan had its last revision in 1989,4 wheel ATV s and similar OHV vehicles were a relatively minor consideration. Since then, there has been considerable growth in usage of these machines on public lands. I have observed over the years substantial increases in resource damage wherever OHVs and particularly ATVs are used- soil erosion, destroyed vegetation, disturbance of wildlife, an- and water pollution, etc . . ATV users have created hundreds of miles of illegal trails and travel illegally on quiet use trails. They present a safety concern for other users because of the high speed at which they can travel, and adversely impact backcountry enjoyment by other users.
708	I recognize that BLM has an obligation to provide a balance between providing recreational opportunities, and protecting resources from degradation by these users. Certainly, ATVs can provide a fun, enjoyable excursion into public lands and if used properly can minimize its impact. There are certainly many responsible A TV users. However, the resource damage created by many A TV users far exceeds the value of recreation experiences received, particularly when compared to other users. Much of this can be attributed to the very nature of the design and operation of the machine- it weighs 5 to 20 times more than a person (500 to 1500 lbs) and it can generate 100 times more horsepower, all of which is applied to spinning, knobby tires, similar to a rototiller. Its impact is generally more severe than other types of OHV s (dirt bikes, jeeps, etc) because of its ability to travel over rough country, maneuverability, size and relative stability. There is also the fact that many ATV (and some other OHV uses) are interested primarily in challenging the natural terrain; i.e' can I cut across that switchback or get over that obstacle or beat my buddy down the trail' .(as opposed to going out for a nature ride). If one had set out purposefully to design a machine to create havoc in the backcountry, they could not have done a better job. Sometimes it seems that BLM feels it is obligated to provide recreational opportunities to whatever type travel machine humans can devise; A TV s, rock crawlers, etc. What will be next: the Dalles D-4 bulldozer club.
710	All OHV s should be restricted to designated trails approved by BLM, and the number and mileage of A TV trails should be based on person- user days (not milage traveled) , balanced against the resource damage they create and impacts on other uses. Which would greatly reduce their designated trail mileage). There is an absolute need for better management of motorized use users; this should be the number one priority in the new Plan.
713	Obliterate old or unauthorized roads.
714	Clearly mark usable motorized trails and fine those going off of them.
722	designated off road trails
729	The only changes would be to maintain the roads that are in the BLM areas.

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733	Snowmobils should not be restricted to trails like other OHVs. If you have never rode a snowmobile and would like to see what it is all about I would gladly go with you so you would see what it is about. If you do not have a snowmobile to ride I have an extra one for you.
768	That all existing trails and roads remain open and recognized for multiple use including Mtn. Biking in the West End (Unit 5)
769	The Paradox Trail is able to retain its original corridor as publicized by COPMOBA/BLM brochures. That a "hike your bike" option is considered for that southern portion of the Tabeguache SMA boundary (800') to allow the hike a bike option.
770	New routes in the east and north sections outside of Nucla proposed by COPMOBA (Sprabin Park bypass, Oct. 2009) for multiple use be allowed for development including almost 2 miles single track to link up existing two track.
772	The new BLM Nucla Section 1:100,00 maps contain many omissions and inaccuracies. It needs to be reviewed and corrected. The older maps are much better for the information they contain. The Paradox Trail should be marked on new maps such as the Tabeguache Trail is.
774	Allow for trail designations for multiple use within Unit 5 specifically along the Paradox Trail corridor but also around the communities of Nucla and Naturita. This would include trail markers, publications, and possible trailhead signage outside or within town.
775	Develop loop routes for multiple users in the West End.
780	Allow for a boundary trail on the South side of the Tabeguache SMA for use of hikers and those wanting to hike their bikes through along the Paradox Trail (800') North of Spradlin Park.
781	Allow for the development of more mtn. biking opportunities around the communities of Nucla and Naturita.
783	Map 3.1 Recreation and Travel Management Plan does not show the Paradox Trail and should be included as is the Tabeguache Trail.
789	Less irresponsible road development and usage of existing roads.
807	Open road that you have closed
840	Continued access to public lands by motorized recreation. Maintaining a managed motorized system (OHC and full size vehicle) that is distributed to unique areas throughout the planning area.
842	Maintain the existing systems.
850	I just want to keep all the 4WD roads open. They are the best multi-use system for people of tolerance, everybody is welcome, just have to learn to share.
860	There are places where roads have caused severe soil erosion. Many of these roads will eventually be closed, according to the BLM Travel Management Plan, but until then, if ever, the erosion continues.
869	3.2 Where should BLM leave areas open to OHV use? Main routes only. Poaching has increased drastically since ATV's have been able to go wherever they want. Weeds have also spread along roadways as the seeds are carried on the tires of the ATV and people's clothing, gear and pets. Although the travel management plan has been finished, I've seen no one out making road closures. ATV use should be limited to certain times of the year, as they cause road damage during muddy seasons in the spring and fall. Since they are newer on the scene than hiking, they should not be allowed on trails that were originally just hiked. They should be kept out of remote areas--walking only. They should not be allowed in canyons or near water, as their bush whacking starts new roads and causes erosion. They should not be allowed on grazing allotments when cattle are present. Too many times we've had to confront people on ATV's chasing our cattle on public lands.
888	Access to these areas may need to be a maintained trail for walking, or footpath. Encouraging easy access is detrimental to the wildlife and vegetation.
912	My wife and I are avid users of the single-track trail system known as Jumbo Mtn BLM area near Paonia. We regularly run, hike and mountain bike on the Jumbo Mtn. trails almost year-round, and we are concerned about the dangers and impact of allowing motorized vehicles on the bulk of these trails. Due to the terrain in this area, the many of the trails offer very narrow sight lines and little passing space, a situation only exacerbated by allowing motorized use on traditionally non-motorized trails. We are also very concerned about the erosive impact of heavy vehicles too large for narrow, steep trails over loose soil. Some of the double-track areas already show

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	significant signs of erosion. As homeowners in the town of Paonia and very avid outdoor enthusiast and athletes who use the Jumbo Mtn. single-track trails regularly, we ask BLM's support in preventing the further encroachment of motorized vehicles on these single-track trails by clearly designating the existing trails for only nonmotorized travel.
918	ATV travel on BLM lands in the area from Jay Creek east past Love Gulch and north onto Oak Mesa needs to be confined to marked routes. It appears from your website "Route Map" that there are no routes in this area. When I try to access the "Existing Road Inventory" maps, I get a message that the requested URL was not found on this server. I recall seeing a map at the Hotchkiss scoping open house showing this area to have travel restriction, but do not recall if restriction was to existing routes or designated routes. At any rate, every year, especially during hunting seasons, there are ATVs in the area, some of which trespass onto private lands. I believe resource damage is occurring from these vehicles in the form of soil erosion, compaction and rutting when soil is wet and spreading of noxious weeds. The above mentioned fencing project might help with the trespass situation. I believe off-road vehicle use on all BLM lands should be restricted to existing or designated routes, though I see no way for adequate enforcement given existing funding levels.
974	I would like to see roads closed permanently - obliterated and revegetated. Roads that are not closed permanently could be seasonally closed with gates. Main routes would remain open.
975	Priority on improving and protecting wildlife habitat and secure areas by decreasing human activity on public lands by implementing and enforcing motorized and seasonal closures.
977	Encourage recreational uses to travel by non-motorized and non-mechanical means.
978	Less motorized users traveling in smaller groups with more respect for the resource by packing out trash, respecting closures and seasonal restrictions and respecting the value of solitude and wild-primitive nature of publics lands.
979	I encourage BLM to make the bold management decisions needed to limit motorized use thereby decreasing the amount of human activity that negatively impacts wildlife.
986	Several times I have hiked in Roubideau Canyon area. I sincerely believe it would be a big mistake to open that area of Patter and Monitor Canyons to Motorized vehicles. For sake of today and future hikers, I urge you protect this great resource from the damage motor traffic causes.
1006	The attitudes of the users is vital to the success of any resource management. In that regard, while I applaud the decision to restrict unlimited travel to a few specially designated areas, I hope the BLM will recognize that a designation of "Limited to Existing Routes" is unenforceable and encourages people to claim, "other people drove there, so it must be existing." I encourage the UFO to move to "Designated Routes Only" as quickly as possible throughout your territory, and to continue to stress informing and educating users about such restrictions. Yes, we all wish we could go wherever we wanted, but that won't work in this populous an area.
1016	Closing those areas to public access and use.
1018	The only changes would be to construct roads to make it more accessible to the public.
1020	In heavily used areas where there is environmental damage taking place, limit the number of users, size of groups, behavior of users, etc. but do not close the areas to no access.
1036	I would like to see more ATV access and trails versus the current assault on motorized access on public lands. In the past 10 years you have only closed accessed during a time when more and more people are starting to enjoy the use of ATV's on our PUBLIC lands. It is my opinion that the only groups that enjoy more access to our public lands are Cattle and Gas Rigs. I've see the damage that is done by both and it far out ways anything I've seen by ATV riders.
1037	I can't believe you actually want to limit pedal bikes to designated trails as well. Where will this madness end.
1038	Here is a question: How many new trails have been opened in the past 10 years vs. how many (undesignated and designated) have been closed.
1039	I rarely use my 4 wheeler while hunting anymore, most of the trails in my area have been closed because they were not "designated". The trails had been there for 20-30 years but they did not have the magic number on someone's map.
1040	In my opinion any established trails should be given a "designated" number - - not closed because it does not

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	have a number. Give it number, give us more access, give us more access just like you give cattle and gas rigs. My favorite is when I watch gas rigs drive down perfectly good gravel roads on public land and the sign says that I have to walk or ride a horse on that very same gravel road. That scenario shows me the BLM's and National Forests true attitude toward the average American.
1056	After reading each of the sections, it seems to me that the Travel Management (Regulation), section -3.2 may be the key to all the other sections. Travel on Public Land is no doubt going to be one of the "hot button" issues that will have proponents for every scheme of regulation that might be devised.
1058	Travel is as old as the earth. Since the beginning of human societies travel was the means that brought them together and provided them with food and shelter. If the BLM thinks it necessary to regulate the travel of we citizens, it must overcome the human desire to travel when and where we want and how we want. So -- let's start with why. Why is any restriction of travel necessary? Is there a calving, fawning, nesting area that would be disturbed by the travel of humans? How will human travel affect the species involved? What period of time will the restriction be in effect -- seasonally or permanently? If this is the case, what kind of travel will be restricted? Will it be foot traffic, horse traffic, ATV traffic, snowmobile traffic, or automobile traffic? Where will the traffic be restricted, in a general area, or a specific area? How will the owners know that traffic is restricted by type and place? Who is going to enforce the travel restrictions and what will be the offense?
1059	If there is something that currently requires a travel restriction, who is going to make that determination? Is that what the scoping is about? If that is the case, I would vote for no restrictions to any kind of travel. I must be convinced that there is a problem that can be solved only by a travel restriction of some sort. For example, if equestrians are using a developed trail and mountain bike riders are using the same trail, there may be no conflict; however, if the terrain and vegetation are such that a horse cannot see a mountain bike coming until it is almost upon it -- a conflict may exist. The conflict can, however, be solved without a total restriction of either mode of transportation. Give the horse the right-of-way, and put up signs for the mountain bike riders to walk their bicycles in those areas. Since the trails and roads on most of the BLM administered land will not be under constant patrol, the signs will put the liability on the bike riders if they do not comply with the warnings. An official sign creates a civil liability in the event of injury to the rider or the horse if the biker ignores the sign. This will require no policing on the part of the BLM. It is a matter of awareness and common sense.
1060	As I've said, restrictions must be justified for motorized travel as well as non-motorized travel. Travel on rivers and lakes should not be restricted unless justified, the same as ground travel.
1061	I'm sure you will get all sorts of excuses for restricting every kind of travel on every acre of BLM administered land. Do not accept excuses. I doubt, however, that you will get much response from the "general public." I'm guessing that most of the responses you get will be from "special interest groups" that will be looking for excuses to close our land to any use that requires travel--except foot travel. Don't be led down the path of believing that damage by erosion will be caused if any kind of wheeled vehicle is allowed on the land. Erosion is part of the life force of the organism called "earth." What little erosion is caused by wheeled vehicles is minuscule in the grand scheme of the life of this earth. In truth, erosion occurs all the time across the landscape, with or without the presence of humans or their machines. Our rich and fertile valleys are the result of erosion, most of which occurred prior to human habitation. The landscape administered by the Uncompahgre Field Office of the BLM is just a small part of the greatness of the total landscape that has been formed by forces other than man. More erosion will be caused by the earthquake in Haiti than all the human travel that will occur in the next fifty years on the lands administered by the Uncompahgre Field Office of the BLM. The Yellowstone National Park fire allowed more erosion than vehicular traffic will cause here in the next fifty years. As the earth breathes, it moves. Man can do nothing to stop it or have any significant effect on its breathing and changing. When a tree dies, it is replaced, not necessarily by another tree but by some vegetation that takes its space for growth. As animals eat and trample vegetation it is replaced. The earth will put forth new growth--whether or not it is what man desires is of no matter. Today's vehicles do much less to initiate erosion than the vehicles of our ancestors. The wagons used by the pioneers going west dug great trenches in the earth. The travois used by the earliest people in North America dug large gouges in the earth. Since the sixteenth century, horses have trampled the earth in most of the western United States. The elk, deer, antelope and buffalo have been trampling the earth for eons and now cattle are trampling the earth. All of this trampling increases the likelihood of some increased erosion. I doubt the BLM wants to get rid of all the hoofed wildlife on the Publics' land.
1064	Guiding the use and travel routes for this land will be much more effective than imposing restrictions.
1065	More access for ALL users, not less. Expand trails, disperse users, improve relations with all users and among all

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	users.
1066	Cutting down on the miles and number of trails is WRONG.
1067	Restrict all off-road motorized traffic to WELL-ESTABLISHED existing routes;
1071	Limited access for people with disabilities. See the 1990 Americans with Disabilities Act and the BLM's MOU with Wilderness Enquiry for ideas. BLM should take the initiative to improve access to lands and river segments it manages (via land access) for people with disabilities.
1107	Please maintain public access to existing ATV trails that provide opportunities for those with limited hiking ability to enjoy public lands.
1121	I have lived in this area, close to Dry Creek, since 1981 and have watched with interest the increase in the amount o fuse this area has been and is currently getting. The Off-Road traffic has really increased in the last ten years. It has been my observation living here and hiking here that there is a problem with these vehicles. That problem being that they do not remain on the numerous roads that are available to them, but instead choose to bully their way up the small rocky canyons here. In doing so they are destroying the small amount of vegetation that is present in these areas and they are tearing up the general landscape. We all know that the desert landscape is fragile and the effect of one vehicle driving over the cactus is visible for many years. In addition they camp down near Dry Creek and leave their trash for others who do not consider this land a wasteland to clean up. I wish I knew the answer for this problem, but I am sorry I don't. Perhaps this planning committee could use the plan that was devised for Peach Valley as a template for Dry Creek Canyon.
1133	In addition, 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.
1173	Road related problems and environmental impacts are often identified as significant elements that impact aquatic and terrestrial resources and affect water quality, stream and wetland processes, fish and wildlife through erosion, sedimentation, and/or fragmentation of habitat. The travel management analysis for the RMP/EIS should include a structured, systematic road inventory, including identification of the road/trail network needed for management objectives and public access, as well as what can be adequately maintained to address water quality, fish and wildlife concerns. Specific attention should be paid to road density, number of road stream crossings, road drainage and surface erosion, culvert sizing and potential for washout, culvert allowance for fish migration, effects on stream structure and seasonal and spawning habitats, and impacts to riparian habitats.
1174	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. OHVs, such as off-road vehicles, trail bikes, all-terrain vehicles, and snowmobiles, are able to access areas much further into isolated public lands than was possible historically. EPA 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 numerous adverse impacts, including: unplanned roads and trails; erosion; spread of noxious weeds; damage to water quality, riparian and wetland habitat, stream channels and fisheries; reduced migration corridors and wildlife habitat; and 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 OHV s to soils, watersheds, vegetation, wildlife habitat, water quality, cultural resources, and other assets of the planning and decision areas.
1180	It is very important to San Miguel County residents and government programs to be able to work with BLM to plan and hopefully build recreational trails. It is a long standing goal to connect San Miguel County to Ouray County and beyond via a trail for hiking and bicycling over Dallas Divide. Parts of the trail are in place on the San Miguel side. This trail would connect to the regional Galloping Goose Trail which connects Telluride and Lizard Head Pass.
1182	Recently, the County Open Space program began exploring the concept of connecting Norwood/Wrights Mesa to the Placerville area. The idea was to try to utilize the old mine roads on the north side of Colorado 145 and the mesa top in some places.
1190	Specific to the Community Assessment, we would like to emphasize the Partnership Opportunities that have been articulated. The Assessment provides the following: * Most groups would like municipal and county governments, community residents, and organizations and clubs to cooperate with BLM on trail planning (including the route

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	designation process) and maintenance, as well as on noxious weeds management. * Some groups would like municipal governments and community residents to work with BLM on improving access from towns to BLM public lands. These are indeed points raised and supported by the Town of Ridgway.
1192	There are several BLM parcels that lie within close proximity to the Town, and one 40-acre parcel that is surrounded by the Town on three sides. With regarding to the outlying parcel located on the east side of Hwy 550 and directly adjoining the Bureau of Reclamation property and the Ridgway State Park, the Town would like to see trail connectivity both to and within this particular parcel. This land is seeing considerable usage for multiple recreational purposes including hiking, mountain biking, horseback riding, hunting and wildlife watching. The usage of the parcel for single track trail is of particular interest to the Town as the topography is well suited for this activity, the area is connected to this community by the RiverWay Trail, and this would present a recreational opportunity that we feel greatly compliments existing uses at the adjoining Ridgway State Park.
1194	With regard to the 40 - acre tract that straddles the Uncompahgre River and includes the RiverWay Trail, the Town notes the specific importance of this tract in terms of trail connectivity, wildlife (the site is occupied by many species including deer, fox, badger, herons and roosting bald eagles), and passive recreational uses including picnicking, hiking and wildlife viewing. Notably, the parcel abuts a Town owned park (Dennis Weaver Memorial Park) and trail connectivity and possible pedestrian bridge access may be enhanced between these two parcels. The Town would like to partner with BLM in meaningful ways to explore these ideas and assist in the needed stewardship of this 40-acre parcel.
1210	CNAP recommends that Fairview South ACEC Natural Area remain designated as 'Closed' to motorized use. The continuing closure of this area to motorized use would assure 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 Fairview South, CNAP recommends a 'Limited to Designated Roads and Trails' OHV designation. As part of this process, CNAP recommends that an implementation plan be prepared that incorporates open road designations for the areas indicated.
1211	Additionally, CNAP recommends that vehicle use within Needle Rock ACEC continue to be limited to designated roads and trails yearlong.
1227	In addition to the Wild & Scenic Rivers eligibility there are several areas within the RMP planning process which warrant additional comment. Travel Management, Water Quality and Soils are of concern to the River District.
1318	as the BLM knows, much of this land was designated as wilderness. Such designation has increased tourism and traffic to the wilderness boundaries. That increased traffic is now going through the private lands belonging to the Escalante Ranch. The Uncompahgre RMP should address the issue of increased traffic, tourism and access to the wilderness so as to not impact the Escalante Ranch private lands.
1343	Motorized cross-country travel should be allowed in areas designated as open, limited to existing roads and trails, limited to designated roads and trails, and closed to motorized use, for maintenance of existing and planned transmission lines and associated facilities. The BLM should leave areas open for OHV use where an existing use or ROW grant is issued, or for those areas designated as critical to the health and safety of the public.
1686	BLM should not allow new motorized trails in remote areas that have few or no trails.
1688	The North Delta Open Area should remain open to ATVs and should be managed to the standard of the Gunnison Gorge NCA. No new open areas should be created in the UFO.
1689	The UFO should continue to manage the Tabeguache Area as wilderness and should not allow mountain bike trails.
1766	Lands with wilderness characteristics should be closed to motorized and mechanized use.
1782	The experience convinced me that we need to keep roads out of wilderness areas. It would not have been as easy for me to get a kayak to that lake, but it would have been impossible for my harassers to get jet skis there. Roads give pure evil a convenient way to the wilderness, and destruction follows.
1788	This is one of the most beautiful places I have ever been, and it would be a disgrace to our National Heritage if we exploit it for uranium, oil, gas, and destructive off road recreational vehicle use.
1825	The closing of roads for public use, mining use and agricultural purposes, keep them open and available.
1827	I think the BLM should leave the roads that are open and used open, there would be less travel off the roads if

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	there were more roads.
1837	We thank BLM for their decision in the Dry Creek Travel Plan to not accede to a request from the motorized groups to designate an ATV loop trail that would descend into Monitor Creek from the 25 Mesa Road and completely change the character of this now wild canyon and urge the BLM to stick with this decision.
1846	Manage for natural soundscapes in the Uncompahgre RMP, crafting a travel plan that incorporates sound management in backcountry, primitive recreation settings. The RMP should include a soundscape policy that acknowledges the impact of off-road vehicle and other noise on wildlife and Quiet Users. The policy should confine noisy uses to selected portions of the field office. Off-road vehicles should be restricted to areas where they will have minimal impacts on wildlife habitat, quiet users and the quiet solitude of BLM back-country.
1847	Institute a policy that designated ORVs routes remain open subject to compliance.. If resource damage and off-route use can not be controlled these routes would be closed.
1883	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 be kept available for those who value this type of recreation. Other 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 recreate with their friends in an area close to parental supervision are highly valued. Some OHV events, such as trials competitions, require the "open" designation to be viable. Staging areas for competitive and other commercial events are another example.
1884	The Planning Team is cautioned not to segregate users who value the "open" designation into smaller and smaller areas. Crowding users who require the "open" areas can increase safety risks to the public as increasing numbers of OHV enthusiasts are compacted into ever-smaller areas
1889	It would provide a public benefit to all trail users, both motorized and non-motorized, to approve routes for permitted events in the programmatic travel planning process. We also believe this would benefit the agency by helping to reduce the future workload when processing permit applications.
1890	Need for "point-to-point" recreation opportunity. Long distance, "point-to-point" recreation is becoming increasingly popular with motorized and mountain bike enthusiasts. The UFO is a key hub for this type of recreation. Several routes exist between Loma and Moab, between Fruita and De Beque and between Clifton and Delta are becoming quite popular. BRC strongly encourages the plan to acknowledge this need and direct activity planning to meet the current and future need.
1891	Need for connecting existing routes and areas in the UFO and adjacent offices. Similar to the concern mentioned above, BRC encourages the agency not to "land lock" trails or areas. Long term planning that allows, or at least does not restrict, connecting recreation opportunities within the UFO and beyond should be considered.
1894	BLM should develop a wide range of Alternatives responding to Issues raised by the public. BRC supports active recreation management on all public lands and National Forests. Insofar as active management of OHV use, the OHV community generally supports the "travel limited to designated roads, trails and areas" paradigm.
1991	Set route density targets In the uranium zone we also recommend that the BLM use methods recommended by The Wilderness Society (see SRCA letter), setting road density targets based on studies (and observations) of plant and wildlife sensitivities to roads.
1992	Close spurs/duplicate routes Reducing densities could also be done by examining route maps to identify obvious duplicate routes and spurs for closure. As mentioned in RMRI scoping letter # 2, this should be done in the RMP rather than waiting for the subsequent travel plan. The Land Use Planning Regulations, as repeated in UFO RMP Travel Management Handout, state that a RMP "will delineate Travel Management Areas….[and]..a map of a preliminary road and trail network." In other words the RMP can do a lot to reduce route densities without waiting for the travel plan.
1993	Reduce habitat fragmentation in the west end of UFO On the West End Route Inventory Map 2, produced with the proposed 2008 RMP Amendment, very high road densities needing reduction appear in the following locations: • A proliferation of routes and spurs SW and NE of the Opera Box Mine on Road DD19 • A dense concentration of routes branching north off Road EE22, north of Long Park and the Honey Moon Mine • Route proliferation east of Hieroglyphic Canyon and west of the canyon in the vicinity of Tramp Mine west • Comparing the West End Inventory Map with the 1999 BLM topo map, there are many new routes north and south of the San Miguel River

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	west of Nucla, on which more use may have become recently established and which need to be looked at for closure • There is also a dramatic increases in route development on the BLM parcels west of Norwood, including Spring Draw, Callan Draw, Burn Canyon and McGee Draw. While some of this could have been missed in 1991, some routes appear to be new roads built in association with prescribed burning and vegetation treatments. Such roads should long since have been closed, let alone being shown on publicly distributed maps. This landscape does not need more roads There may be a similar high density area south of the Dry Creek travel planning unit but RMRI did not have time to look into it.
1996	Less miles, more saddle time - Accommodating more use on fewer miles and acres The National OHV Conservation Coalition (NOHVCC?) is developing motorcycle trail guidelines to allow more opportunity on fewer miles of trails, in response to closing opportunities everywhere. How can riders obtain an enjoyable day's experience on fewer miles of trail? One way is to retain the difficulty level not just of motorcycle trails, as well as 4WD roads, ATV, and even mountain bike trails. This includes avoiding heavy maintenance on level 2 roads and preventing single track trails from being widened by ATVs. Land management agencies and counties have a tendency to improve roads and trails that the motorized community prefers keeping rough and rugged to retain the desired challenge/rock crawling experience. When challenge routes get upgraded ORV users forge into new areas to find these opportunities, perpetuating the cycle of route proliferation. For this reason the RMP should include a policy of not widening single track or ATV trails and not upgrading challenge level motorcycle trails and 4WD roads except to address resource damage. Keeping high challenge levels in motorcycle trails can also reduce user numbers to more manageable levels and even keep shared-use trails with hikers from becoming high traffic motorcycle corridors that displace hikers. Not just remote settings but trails themselves can be kept more natural and less "improved" thereby creating a more natural user experience.
1997	Compliance as a condition for keeping trails open Use compliance and minimal impacts as conditions for keeping motorized trails open—placing the burden of enforcement on users, which will be helpful in remote areas not frequently patrolled. The Salida Ranger District is exploring an OHV patrol position that would be jointly funded by the Forest Service and non-profit recreation groups. As an example of a "keeping motorized areas open conditionally" policy, we point to the UFO's closure of a damaging rock crawl area. Other conditions for opening new trails should be a commitment up front on the part of ORV users for long-term funding for maintenance and patrol. Such conditions are laid out in Appendix 6 of the Royal Gorge BLM's Arkansas River TMP EA as follows: • The [trail] proposal would further the Desired Future Conditions of the sub area • 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. • The specific location of the proposed trail has been flagged on the ground • The decision has been authorized under a site-specific NEPA RMRI recommends these conditions be in place prior to trail designation, rather than trails being approved with these conditions remaining a mere wish list for the future.
1998	Process for designating motorized and mountain bike trails The Pikes Peak District of the Forest Service is working with a consulting firm, (EDAW, but has a new name) on mapping decision constraints on motorized trails, such as permitted activities (grazing), topography, private property and other access barriers, WSA, ACECs, PCAs, management on adjacent jurisdictions, and resource constraints such as sensitive wildlife habitat, watersheds or soils. We recommend an approach like this for UFO travel planning. Of course in remote areas enforceability should be the bottom line criterion for new trail locations.
1999	Interim Management Interim management is a challenge. Below are some ideas on managing motorized use until travel planning can occur: • Close and sign everything not on the "existing route" inventory • Physical closures • Emergency closures of damaging routes where terrain allows • The Field Office Wide Route Inventory map appearing on the RMP website appears to show recently established user-created trails –in color. Although they are "existing" on the ground, displaying user-created trails publicly will ensure they get more use and will be harder to close in a final decision. RMRI also supports the interim management recommendations in the SRCA letter.
2067	The areas highlighted in red on enclosed 1999 Nucla BLM topo map (copy) are areas on the west side of the UFO that appear on the topo map to be less roaded than surrounding lands, or to have no roads at all.
2068	The boundaries nevertheless show how rare and isolated these less roaded lands are, suggesting in itself that they

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	bear further study as potential wildlife and quiet use areas.
2075	To underscore the importance of less roaded and trailed land, we trust the UFO has access to the large bibliography of studies that show the negative impacts of roads and trails on wildlife and natural resources---- research which applies to mountain bike and hiking trails as well, not just to motorized trails!
2076	The current RMP is a one-time opportunity to set aside these less roaded areas for the uses above, by closing the remaining roads and establishing the areas as unroaded, non motorized quiet use or just plain wildlife areas.
2078	It is especially appropriate that this be done in the RMP rather than waiting for the travel plan because, as the UFO RMP Travel Management (illegible), the RMP (illegible)Travel Management Areas .... [and)..a map of a preliminary road and trail network." In other words, the Land Use Planning Regulations mean the RMP needs to identify both motorized and nonmotorized areas as a basis for later motorized trail designations, as well as a preliminary route network where roads and trails will and---presumably---will not go.
2088	We recommend the BLM recommend this overlay process, adding cultural and paleontologjc layers, visual/scenic resource, soil, slope and vegetation layers, CNHP element occurrences, existing and potential ACECs, big horn sheep and other big game layers, Breeding Bird Atlas layers, first hand observation, and soundscape analysis to identify levels of natural quiet. This analysis will flesh out the values these less roaded areas have that make them worth protecting for future generations.
2090	Final Step The final step involves management direction, giving the areas non motorized and perhaps nonmechanized management prescriptions, identifying levels of protection for plants and wildlife, levels and intensities of quiet use, whether the areas will be identified as ERMAs or SRMAs, finding citizen adopt groups, etc.
2093	The area delineated in red on the map forms a needed extension of the Tabeguache SMA because it fills in a corner necessary to connect the SMA with the large Forest Service roadless area to the east. This roadless area was included in a core reserve proposal RMRI helped design in the 1990s in conjunction with the Uncompahgre Travel Plan. A Forest Service map attached here shows this area as clearly unroaded and, thanks to RMRI's and other groups' efforts, the area was designated as a Closed Travel Area" in the final TMP.
2096	The western boundary drawn on the map has been extended to Long Mesa to incorporate a piece of the Potential Conservation Area. Providing a nonmotorized/nonmechanized prescription for this entire area represents an important opportunity to safeguard an unusually large and rare chunk of diverse and unroaded land, as BLM and Forest Service lands surrounding Tabegache are densely roaded everywhere else.
2098	Mountain Bike Management The BLM Tabeguache Special Management Area is a wilderness area in everything but name and as such needs to be managed for horse and hiking use only, not for motorized or mountain bike use. We understand the BLM has been actively managing it this way and we would like to thank you and strongly recommend that mountain bikes continue to be disallowed.
2100	Saw Tooth Ridie Sawtooth Ridge on the southern tip of Long Mesa is virtually unroaded on the 1999 top map. This map was done only 11 years ago, suggesting that the roads appearing on the Field Office-wide Road Inventory on the website are recent, user-created and, not having a long history of use, can be closed to create an important quiet use and habitat area. Saw Tooth Ridge is in mule deer severe winter range. The northern boundary could be drawn along the road that dissects Section 8 to the north.
2102	South of Saw Tooth Ridge there appears to be a less roaded area in the upper reaches of Dry Creek canyon. As with Saw Tooth Ridge, some of the routes appearing on the RMP inventory map appear to be recent incursions and should be closed, as they are not appearing on the 1999 topo map.
2104	Saucer Basin Saucer Basin is across the Paradox Valley to the north. The boundary drawn on the map includes lands that appear roadless on the 1999 topo map even though a few, likely user-created, routes that could be closed, have cropped up on the RMP inventory map.
2107	Altogether, we recommend the BLM give this entire combined area extending from the Dolores River on the north to the vicinity of Honeymoon Mine to the south, a non-mechanized, nonmotorized management prescription.
2117	Sharp Canyon West of Nyswonger Mesa another roadless area is marked on the map in the vicinity of Sharp Canyon. This area is in an elk winter concentration area and further GIS analysis would likely show other values that would benefit from keeping the area nonmotorized.
2118	Lion Creek And just north of Route 90 is another area that is clearly roadless on the RMP inventory map,

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	between Spring Creek and Lion Creek. Like Sharp Canyon, Lion Creek should be studied by the BLM as a unique if small example of roadless land. If these areas are roadless now after so many decades of uranium exploration, that in itself is worthy of note.
2120	Wray Mesa While not roadless, we note that this area is Desert big horn sheep habitat with good condition grasslands. It needs to have a spring seasonal motorized closure to protect big game.
2123	Other solutions of course are reducing road densities by setting road density targets, closing spurs and duplicative routes and narrowing motorized use down to a few logical, linked loops and travel ways that provide opportunities without the broad scale cross-country impacts that are now occurring.
2182	UVA supports in most respects present efforts in managing the various categories, but feels that in developing the new RMP that significant travel restrictions specifically restrictions to established routes, and in some cases the closing of routes, will be necessary for management plans to succeed in preserving and improving resources. We feel that the Dry Creek Travel Management Plan can serve as a useful model for the entire area administered by the UFO. And in this regard it is essential that the Dry Creek Plan remain intact and that the road and track closures in the Potter and Monitor drainages be maintained. The Dry Creek Plan was not quick, or easy or without controversy, but the systematic, unwavering commitment to public involvement, input, consultation, compromise and collaboration have laid the groundwork for a successful formulation of a new RMP. We send our best wishes for a successful outcome. The welfare of our home territory depends on it.
2194	North Delta Designated OHV Play Area. On the basis of the excellent signing, fencing, patrolling and other management that the UFO has implemented in the OHV open areas in Peach Valley/Gunnison NCA, we recommend that the North Delta motorized open area remain open with management practices in place that are equivalent to Peach Valley/Gunnison NCA.
2195	We do not want other OHV Play Areas created because of likely damage to native ecosystems.
2196	Jumbo Mountain. Historically Jumbo Mountain, near Paonia, was sparsely used, primarily by hikers. However, use has increased greatly in the past 20 years, with ATV users and mountain bikers appearing as new user groups. Because Jumbo Mountain is so close to Paonia and because it is used intensely for recreation, it should be used exclusively for recreation. For safety reasons, BLM should exclude mountain bikes and ATVs from trails designated for hiking and horse riding. The BLM should investigate whether new access points might be developed that would decrease conflict between user groups. Several of our members are adjacent property owners and we urge the BLM to work closely with them on access issues
2200	Limit motorized use in the UFO to existing trails.
2201	As soon as possible complete ORV route designations on all UFO areas where this has not been done.
2202	In the interim, make a plan for how to contain expanding use.
2203	In the interim, close all damaging routes
2205	Identify and close sensitive areas • Sensitive areas/habitat needed by elk, deer, big horn sheep, antelope, rare and sensitive plant and animal species such as Gunnison sage grouse, prairie dogs and burrowing owls • Sensitive watersheds, riparian areas • Erosive soil areas • Fragile vegetation types • Big game winter range, calving, lambing and fawning areas. Studies, for example those by Michael Wisdom, have shown that deer and elk are disturbed and leave areas frequented by both ATV's and mountain bikes. • Remote areas that cannot easily be enforced • Areas where motorized noise will disturb wildlife and Quiet Users. • Some of these areas also may need to be closed to mountain biking or even hiking in the case of highly sensitive areas. • Any sensitive sites should be closed (seasonally, if appropriate) to antler collection, as is now being done on UFO to protect sage grouse habitat
2206	Close or keep closed the following places to motorized recreation • BLM lands north of the Tabeguache Creek WSA/Special Management Area including the Shavano, Campbell, and Burro Creek drainages. • Monitor Creek, Potter Creek, and Criswell Creek Canyons adjacent to the Camel Back WSA. • Portions of San Miguel River Corridor. • Undeveloped areas in and adjacent to all WSAs. • Camp Ridge and Sowbelly Ridge, Rose Creek, and Open Draw drainages, adjacent to Dominguez Canyon Wilderness, • Close the Gunnison and McCarty Trail systems to ORVs and mountain bikes and set them aside as horse and foot trails. • Dolores River Canyon. This area has red sandstone cliffs, river otters, peregrine falcons, etc. WCC supports the more detailed recommendations as outlined in the Dolores River Coalition's comments. • Norwood Canyon. This portion of the San Miguel River corridor provides habitat for mountain lions, hawks, eagles, and both rare and familiar native

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	fish. • Roubideau/Potter/Monitor canyon system west of Delta. Maintain existing road closures and do not build a new ATV loop into Potter and Monitor Canyons. These areas are relatively undisturbed and provide excellent habitat. • BLM lands north of the Tabguache Creek WSA/Special Management Area which include the Shavano, Campbell, and Burro Creek drainages. This area has very high wildlife values and excellent opportunities for non-motorized recreation and hunting. • Conduct road closures of user-developed OHV trails in the west end of Montrose and San Miguel Counties where they were established following vegetation treatments (e.g. chainings) and post-fire revegetation projects. Areas associated with the Burn Canyon fire include Hamilton Creek, Hamilton Mesa, Callan Draw, Burn Canyon, and McKee Draw. The Campbell Creek fire opened up portions of Campbell Creek and Shavano Creek to motor vehicles. Other examples include Bramiers Draw, Wickson Draw, and Mailbox Park.
2207	Conduct an inventory to identify areas of roadless or low road-density (< 1 mile per section) and manage them as primitive backcountry areas with no motorized uses. An evaluation should be done as to whether to close these areas to mountain bikes as well.
2208	Keep routes open conditional on user compliance Institute a policy that designated OHVs routes remain open subject to compliance. If resource damage and off-route use can not be controlled these routes would be closed
2288	I am writing to oppose the idea of allowing an ATV loop in Potter & Monitor Canyons, southwest of Delta, Colorado. As a hiker, I have enjoyed exploring these areas from the Roubideau Canyon access off of 25 Road, and I can't imagine---don't want to---the impact of ATV traffic there. From excessive noise to disruption to wildlife to damage to the land itself, allowing ATVs and the numerous people who ride them is an all-around bad concept.
2289	Please continue to prevent the allowance of an ATV loop in Potter & Monitor Canyons.. We want these areas saved and NOT open to ATV users.
2290	Roubideau/Potter/Monitor canyon system west of Delta. Currently Roubideau Canyon has pretty thorough protection as does one side of Potter Canyon (the left side of the stream as you hike up the canyon from below). But flowing into Potter Creek, a mile above where Potter flows into Roubideau is Monitor Creek, and that 10-mile long, mile wide, 750 foot deep canyon is in some ways the wildest of the three. It is currently protected only by road closures. A year ago the BLM UFO completed a Travel Management Plan (TMP) revision, which reaffirmed the road closures in that area, and designated the entire Dry Creek management region "Designated Routes Only," which was a huge step toward keeping vehicles from tearing up fresh terrain. Under pressure from motorized users to build a new ATV loop into Potter and Monitor Canyons, met with opposite pressure from quiet users and wilderness advocates, the office reaffirmed the road closures in 2009 and did not allow new routes to be built. PLEASE CONTINUE TO DISALLOW!!
2291	As an avid rider and an environmentalist (unlike the obstructionists) I want to see and mingle with all users of public land. This said I have found that loop routs have the effect of preventing user produced trails.
2292	Also foot traffic and horse back riders do not in most cases need established trails.
2297	On aspect of planning that needs special attention is wild land and urban interface. This phenomenon is being used by special interest groups to provide themselves with a private playground on public land. Historic use of these lands
2325	Off-road vehicles and energy development projects do not belong in sensitive areas.
2330	Unroaded areas are needed where wildlife and wild rivers can thrive unimpeded by noisy, dust-creating off-road vehicles or energy development.
2339	Over time, nature tends to self-regulate and ultimately serve humanity best when it is largely left alone - have you noticed ? I can't think of a single example in which a given patch of the earth was better off with ATVs and oil rigs all over it.
2344	Quite frankly, I do not see where these offroad vehicles have the right to desecrate this beautiful land. There are more of us who visit these wild lands in order to enjoy the solitude and the voice of Nature....not the roar of engines. Relegate them to a fenced-in area somewhere away from this beautiful area and let them play in their own manmade sand box.
2365	I have rights too!!! I and others who enjoy quiet hikes and camping in our national parks should not be subjected to the noise and pollution of orv's!!!!! their rights do not trump mine!!!!!!!!!!!!!!
2371	"Management" so often amounts to an excuse for development, whereas this area would be best served if it

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	remained entirely free of human interference, including off-road vehicles, energy development, and especially mining, which is always very nasty
2394	Most BLM land is open to vehicles, off-road sports and oil, gas, grazing, mining and other tear the- land-up uses. In this Plan revision I ask for as much land to be set aside as roadless as possible. As time marchs on this will become the most valuable part of the area.
2408	Please protect this area as much as possible from off road use and drilling for oil and gas. This is a great place for people who want peace and quiet
2418	Lands with wilderness characteristics should be closed to motorized and mechanized use.
2420	I have seen the effects of motorized off road vehicles such as ATVs and snowmobiles on our own piece of river property in Northern Minnesota. Just one uncaring ATVer made ruts in the land which may mar the pristine quality forever. Imagine what many could do to the wildlands. Lets not allow this carnage.
2443	Although the text is 'boiler plate' I have read and agree it with it wholeheartedly, particularly the plea to prevent motorized and mechanized use. Wheeled vehicles belong on roads AND NOWHERE ELSE.
2457	An excellent way to ensure that taxpayers have environmentally-safe access to these lands is to encourage mountain biking. This method of travel on trails allows users access without damaging ecosystems. Compared to allowing people on horses, for instance, mountain biking does not damage trails and mountain bikers are typically very environmentally aware individuals.
2495	The thought of allowing uranium mining or gas and oil development is just wrong - and off-road vehicles should never be allowed. All of these things will destroy the magic that was millions of years in the making. It makes me shudder to even think that this is being considered
2498	Species are disappearing at an alarming rate, due to over-mining, privileges granted to ATVs (which I feel are extremely destructive), and unnecessary destruction of the wilderness.
2503	Thank you for the opportunity to comment on the Uncompahgre RMP revision. No off-road vehicle use, fossil fuel drilling, or mining should be allowed. Protect the land's biological integrity.
2507	Off-road vehicles and energy development need to be very strictly limited and roadless areas for quiet-use recreation should be given top priority.
2528	Motorized vehicles and energy development will spoil this otherwise pristine place that should be preserved for all future generations.
2557	There is nothing worse than hiking along and having to deal with off-road vehicles, the ilk they contain, and the noise and destruction they cause.
2558	The Uncompahgre RMP revision should, in my opinion, include: 1. Limitation on off-road vehicles as much as possible, keeping them in areas where they do the least damage. 2. Emphasize roadless areas.
2562	As part of resource protection in this RMP, extensive unroaded areas must be salvaged for quiet use recreationists and wildlife, ie, it must not be opened for off-road vehicles or energy development.
2592	PLEASE, keep roadless areas roadless!
2601	My family has had a cabin in this region for many years and the impact of increased off road travel has been disturbing to say the least. Please protect this unique and fragile region.
2614	Off-road vehicles including dirt bikes, ATVs, aerial vehicles should be banned from the RA. Four wheel drive vehicles (Trucks, SUVs) should be limited to main roads and dispersed camping areas adjacent to roads. Self-powered recreation should be emphasized. No new dispersed camping locations should be allowed
2656	Please make sure that motorized vehicles are restricted to areas that do not have wilderness characteristics, important wildlife populations, or unsuitable soils or slopes.
2665	We actually need less roads & more habitat for other species, in my opinion.
2671	Off road vehicles should not be allowed. BLM should complete a comprehensive travel management plan. Planning needs to consider all aspects of land use.
2691	As for off road recreation, is it really worth it to wreck this jewel of natural beauty and habitat for endangered species for a few hours of unnecessary, testosterone fueled off road foolishness? Come on…

Table C-20
Issue 3: Travel Management

Comment ID	Comment
2695	You need to limit off highway vehicle use, and support wild and scenic protecti0ons for the Dolores River.
2709	Nothing disturbs me more than having my tranquility and enjoyment of nature disrupted by loud, obnoxious machines. I escape the city for the quiet of the wilderness and do not wish to have my quiet ruined by people with loud, offroad vehicles and motorcycles. When that happens the animals move to other areas and I will not have a chance again to see or enjoy them in their natural habitat. I don't believe that people or animals always have to have their quiet lives interrupted in such a way. There is a time and place for such vehicles but I don't believe our wilderness is one of them.
2737	Surely we can create a sensible way to protect the environment while utilizing the natural resources. The off road pleasure vehicles must go somewhere else. We're talking about the environment here.
2755	PLEASE! Emphasize resource protection in the Uncompahgre RMP revision: ? provide extensive unroaded areas (MAINTAIN natural soundscapes, viewsheds, where wildlife and wild rivers can continue THEIR natural ways) ? Yes, I'm saying that off-road vehicles/rallies/jamborees etc have NO PLACE in these precious and fragile ecosystems
2765	Development of such lands should be held to an absolute minimum if at all, especially where such development is of the destructive nature as oil and gas exploration and development, uranium mining, and off-road vehicle use.

Table C-21
Issue 3: Noise

Comment ID	Comment
454	In general, we would ask that you place the preservation of views and maintenance of silence as very high priorities for lands managed by the BLM.
2008	Protect Natural Soundscapes The RMP should include a soundscape policy that acknowledges the impact of off-road vehicle and other noise on wildlife and Quiet Users. The policy should confine noisy uses to selected portions of the field office. See new TWS GIS sound analysis methods
2242	Noise policy for wildlife The BLM should institute a noise control policy that minimizes the impact of off-road vehicles, extractive industries, and other producers of noise on wildlife and quiet users. Sources of noise should not be allowed in habitat that is critical to noise-sensitive species.
2823	Natural Soundscapes Evaluating and protecting natural soundscapes is essential to the land use planning process. As part of providing opportunities for quiet recreation, BLM must consider activities that interfere with the soundscape associated with quiet recreation opportunities. Research shows that for many people, especially quiet recreationists, the primary reason for visiting primitive landscapes is to attain a sense of solitude and tranquility, which are interrupted by non-natural noises. A study performed by psychologists at Colorado State University found that acoustic stressors impact visual landscape quality, meaning non-natural noise actually affects the perceived naturalness of a landscape (Mace 1999). Therefore, in order to preserve the naturalness of an area, BLM must preserve the natural soundscape. Furthermore, the authors of the study note that "tranquility" and "solitude" are explicitly addressed in the Wilderness Act as values that must be preserved by land management agencies. BLM guidance directs the preservation of "naturalness" in Wilderness Study Areas, Visual Resource Management I zones, and other areas managed to protect wilderness qualities. All of these values are negatively impacted when the natural soundscape is impacted; therefore, BLM must retain the natural soundscape in wilderness-quality lands and primitive recreation areas. A. BLM's Obligation to Preserve Natural Soundscapes Executive Order 11644 (1972), as amended by E.O. 11989 (1977), orders the BLM to locate areas and trails to Minimize conflicts between off-road vehicle use and other existing or proposed recreation 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. BLM regulations at 43 C.F.R. Sec. 8342.1 reiterate this E.O. In order to effectively and appropriately achieve this goal, the Colorado BLM issued "A Recreation and Visitor Services Strategy" ("Recreation Strategy") to help field offices provide quality recreation experiences for all users. The Recreation Strategy recognizes that BLM's obligation to provide recreation areas for many user types requires designation of quiet recreation zones. It defines "quiet recreation" as "Outdoor recreation enthusiasts such as hikers, skiers, mountain bikers, equestrians, bird watchers, hunters and anglers who seek the opportunity to enjoy natural soundscapes" (P. 17) (Emphasis added). We encourage the Uncompahgre Field Office to similarly implement BLM guidance for minimizing conflict between user groups by establishing quiet use areas and mitigating potential noise impacts on these areas. Additionally, courts have upheld the responsibility of federal land management agencies to evaluate noise impacts on the natural soundscape. See Izaak Walton v. Kimbell, 516 F. SUpp. 2nd 982,985,995-96 (D. Minn. 2007). (EA prepared by USDA Forest Service for plan to construct snowmobile trail adjacent to Boundary Waters Canoe Area Wilderness failed to properly analyze noise impacts from snowmobile use, as required by NEPA; EA provided no quantitative evidence of analysis of decibel levels to be projected by snowmobile use of the trail into adjoining wilderness.) B. Effective Soundscape Analysis In order to effectively preserve the natural soundscape in quiet recreation areas, BLM must quantitatively measure (1) the decibel (dB) levels of the natural soundscape; and (2) ORV dB levels on the natural soundscape. Quantification of ORV traffic volume, duration, and frequency are thus necessary components of soundscape analysis. There are many tools available to BLM to adequately measure noise impacts and set prescriptions to prevent negative impacts. The Wilderness Society recently created a GIS model based on the System for the Prediction of Acoustic Detectability (SPreAD), a workbook issued by the Forest Service and Environmental Protection Agency for land managers to "evaluate potential ... acoustic impacts when planning the multiple uses of an area." The Wilderness Society adapted the SPreAD model to a GIS environment so that potential noise impacts could be integrated with other variables being considered in the planning process. We believe the Uncompahgre Field Office has an up-to-date version of this software, and we would be happy to provide more information at your request. The SPreAD-GIS model can be implemented in your existing ArcGIS software at no additional cost. The SPreAD-GIS model was developed for the Forest Service, but its applicability extends seamlessly to BLM lands, as the inputs include vegetation and topography. The Uncompahgre Field Office should use the SPreAD-GIS model to determine what sounds will impact visitors in each segment of the planning area, and what steps must be taken to mitigate these impacts. It is important to note that the original SPreAD operates under the premise that in primitive recreation areas, no noise should be audible above the natural soundscape. We envision this model as eventually being used throughout the field office, but at this stage believe BLM should at least apply it to special management areas and/or other strategically prioritized

Table C-21
Issue 3: Noise

Comment ID	Comment
	portions of the field office. Recommendations: The preservation of natural soundscapes is important to provide visitors with adequate opportunities for quiet recreation. The USGS finds that dissatisfaction with recreational opportunities can "diminish public support for land-management programs" (Douglas xiii). We encourage BLM to utilize the SPreAD-GIS model to analyze and preserve the natural soundscape of the Uncompahgre planning area, especially in special management areas managed for quiet use recreation.

Table C-22
Issue 3: Visual Resources

Comment ID	Comment
137	TMW strongly encourages a comprehensive inventory and analyst of the many scenic values in the UFO.
138	Assigning the inventory one of the BLM Visual Resource Inventory Class Objectives is very important. Very few areas are Class 1 areas. Most are Class 2 & 3.
139	The assignment of these areas obviously dictates the travel management criteria in or around the various sites. In the RMP processes please remember that such areas are historic and should be enjoyed by the public with the appropriate restrictions of preservation. A hand's on viewing is not required to still be open and available to the public. TMW would collaboratively work with the BLM in signage and education for such areas
453	In general, we would ask that you place the preservation of views and maintenance of silence as very high priorities for lands managed by the BLM.
475	This comment pertains to the management of sensitive viewsheds and corridors. Sensitive viewsheds and corridors should not affect energy or mineral development. Energy and mineral development is temporary in nature. When the resource is gone so will the development. Visual considerations imposed on energy and mineral development should not create a significant economic impact or restrict the development of the resource.
476	Existing mechanized or motorized use, dispersed camping and other recreational uses should not be restricted due to sensitive viewsheds and corridors.
589	View sheds should be protected
660	Hotchkiss Area seems good, but I would bump up the area N. of Town to Class 1, and add Leroux Creek to the Class 2 level. That's a value judgment I place on those lands. (not data driven)
870	This information was very interesting, as I had not given this much thought. Thank you for thinking of how people feel about open space in their neighborhoods and the views. This is important to healthy living for humans, and wildlife.
992	I am also thrilled with the amazing archaeological remains found in the area, and the spectacular views, and wish to see them preserved as much as possible.
1176	Visual impacts associated with the resource management activities may affect the visual character and scenic resources of the area, including the aesthetic and/or functional quality of recreational experiences. This may include impacts out of character with the setting, including the visual impact of equipment and crews during construction and operational activities. The severity of these effects depends on a number of factors, including whether the surrounding landscape can integrate visual changes without attracting attention, how far the activities are from sensitive viewing areas and/or roadways, how much disturbance will occur, what mitigation efforts are put forth to integrate activities and structures with the area, and/or the potential to reclaim disturbed landscapes. The RMP/EIS should evaluate these aspects, and detail mitigation steps that will be taken to minimize associated impacts. Interim and final reclamation work should allow disturbed sites to blend into the natural surroundings, to the extent possible.
1208	CNAP recommends retention of the VRM Class I designation for the Needle Rock ACEC to retain the existing character of the landscape that appears unaltered by man.
1209	We also recommend consideration of VRM Class II designation for the Fairview ACEC.
1334	As for visual considerations you desired input on, much of beauty is in the eye of the beholder. The land where uranium has been mined for a century is rugged country.
1784	BLM should also be aware of the visual damage done by oil and gas development. These lands are rare and precious. Please act to protect them.
2111	Nyswonger Mesa South across the valley is another less roaded mesa top that appears to have stunning views of the Dolores River Canyon and surrounding lands
2333	The Dolores River Basin in southwestern Colorado represents some of the most colorful and spectacular wild lands in the state. Geological formations millions of years in the making, healthy river systems, and unspoilt desert all provide a pristine environment for wildlife, including the endangered peregrine falcon, mountain lions, and river otters. Much of this land has been identified by Colorado conservationists as prime lands for Wilderness protection.
2341	Although most of this letter is a "standard" letter composed by The Wilderness Society, I wanted to stress my personal impression of the importance and value of the Uncompahgre lands. I have hiked and climbed in this area,

Table C-22
Issue 3: Visual Resources

Comment ID	Comment
	and marveled at the unbroken expanse of wild beauty. Please ensure that the RMP maximizes protection, and prohibits development, of the remarkable wilderness characteristics of Uncompahgre. Thank you!
2354	I have been in the mountains there, and found the beauty to be as grand as anywhere in the US.
2472	Colorado the Beautiful....but not for long. If all the unique landscape is changed and all the wildlife with it. Think about it.
2481	I lived in Colorado for sixteen years and love how beautiful, wild and open it is. Please do all you can to keep it that way. Thank you for the opportunity to comment on the Uncompahgre RMP revision. The Uncompahgre Field Office encompasses some of Colorado's most beloved wilderness-quality lands, wild rivers, and opportunities for quiet, backcountry recreation. The resource area is also home to important and imperiled wildlife, such as Gunnison sage grouse, that rely on large intact tracts of habitat free from roads and other infrastructure.
2512	My family just last week drove through the lands in question. I get home and discover that this beautiful area is threatened. I am a flatlander who believes that sometimes those who have mountains simply take their beauty and the scenery for granted. Please protect this wonderful place.

Table C-23
Issue 3: Livestock Grazing

Comment ID	Comment
226	The National Park Service and BLM should continue to share information, partner on projects, and otherwise cooperate on issues that affect the lands we administer near our common boundaries. This would include grazing allotments where allotments bleed across our administrative boundaries.
322	issues/concerns? grazing,
340	Saltado Creek Canyon is a spectacular steep sided, deep and wild canyon adjoining the San Miguel River canyon. It is the only major tributary canyon/stream to SMR that has no roads or bridges. It is a key wildlife corridor connecting Uncompahgre Plateau to the Delores Mountains and wilderness areas to south. The current level of access should be maintained and no further development of access should occur. It should be designated a "wild" river section as proposed in the WSR Eligibility Report. Hunting and grazing should be maintained with the possible exception of better protection for riparian habitat from cattle. No motorized access, other than emergency vehicles or maintenance, should be allowed. This area should be managed with wildlife being the predominant management goal. It is also prime Lynx habitat.
345	Protection of riparian areas from grazing impacts in Saltado Canyon to protect willow and other species. Continue grazing but fence or otherwise protect Saltado Creek riparian areas. Note the following for ACEC Record of Decision: There is no indication that current livestock grazing levels and methods are detrimental to the majority of riparian systems in the amendment area. One known exception occurs on Saltado Creek, where livestock are concentrating to the detriment of the riparian system.
380	Ranchers need pasture in the high country.
458	My family has a ranch within the planning area Unit 3 in which we also have grazing allotments for sheep. We have lived and worked in this area for more than 50 years. The allotments we operate or graze are as follows: Dave Wood, Shavano Mesa, Cushman, Big Sandy Wash and Canal allotments. I would like to be involved in the RMP process to make certain that livestock grazing continues in the same manner within the Planning Area with no net loss of AUM's or livestock numbers.
459	I also want to encourage that the use of grazing allotments continue to have the main emphasis for the units within the planning area.
460	Grazing allotments help maintain our lands for not only for our own operational needs but also open spaces for wildlife and open space that people seem to have high esteem for.
461	Livestock are also a very important economic base for Montrose/Delta/San Miguel counties
462	The overall land health standards of grazing allotments within the Planning Area are of an upward trend. I believe that ranchers and range technicians have worked well together over the years to maintain these lands. Grazing has many benefits to rangelands by providing anything from better seed germination to increase plant vigor.
463	Again, I ask that grazing remains as the major emphasis for the Plan. Area, with no net loss of AUMs.
491	Ranching, placer mining, uranium mining, wildlife developments, recreation are among some of the areas for growth.
620	Disallowing the use of roads, grazing land, mineral and energy development, as well as recreational use, would be a poor use of public land. The point of public land is that it belongs to the people. Public lands should be available to all people. The combination of grazing lands and mineral/energy exploitation allows business and employment growth for our county, and recreational use should also be encouraged, not restricted.
677	We have reviewed the Norwood Land Health Assessment (LHA), which covers the BLM lands in San Miguel County. We also compared the results of this LHA to the results summarized in the table found on handout 6.1 for vegetation that was distributed at the scoping open houses. We assume the other LHA were done with similar methodologies to those described on page 47 of the Norwood LHA. We recognize BLM's limitations in resources for monitoring the condition of the lands they manage, and in fact these assessments represent a great effort for BLM staff. However, these are very coarse, qualitative evaluations that are extremely subjective. According to the table on RMP Planning Fact Sheet 6.1, the current assessments were done between 1999 and 2009. The next assessments in each unit will not be done until 10 years later. We believe that BLM needs to commit more resources to ongoing monitoring of their lands to ensure achievement of the five Public Rangeland Health Standards. BLM needs better data to be able to make more defensible and timely management and policy decisions. The Norwood LHA was conducted in 2005-2006. There is no reference to when the lands were assessed last and if the same points were evaluated. "Problems" were defined as a score of 1 or 2 for various health indicators. There is no description of how the presence or absence of these indicators results in an area

Table C-23
Issue 3: Livestock Grazing

Comment ID	Comment
	"on balance" meeting a health standard and being classified as "meeting with problems" rather than judged to be "not meeting" the Rangeland Health Standard.
678	In addition, there is no description of trends in meeting the Rangeland Health Standards. As there has been a requirement for BLM to achieve these standards or modify management practices to move toward their achievement for over 15 years, it seems critical to know if you are moving toward or away from achievement of the standards to appropriately modify land management as required by BLM policy. If there is additional information that is to be the basis of deciding management policy in the RMP revision, its source, indications, and conclusions should be disclosed and discussed in the RMP EIS.
679	However the conclusions on compliance with the Rangeland Health Standard were developed, hundreds of thousands of acres of BLM lands in the planning area have "problems" or are "not meeting" the five Rangeland Health Standards BLM is obligated to manage its lands to achieve. BLM should identify and discuss its conclusions on why lands are not meeting land health standards in the RMP and develop a specific road map to ensure progress toward compliance.
681	As stated previously, San Miguel County believes the interests of the County and the public at large are best served by BLM lands maintaining their natural ecological integrity. Extractive uses of BLM lands have resulted in boom and bust cycles and left indelible scars on our public lands. Historic, and perhaps current, livestock management practices have also contributed to degrading or perpetuating the degradation of our public lands. These activities, along with travel management, have all contributed to the conditions described in the LHAs.
683	We agree with the recommendation in the Norwood LHA that BLM "implement grazing practices that leave more litter on the soil surface, prevent grazing on re-growth by limiting the time of use to two weeks or less, and minimize the instances where livestock graze the same areas in both spring and fall seasons". The "most common problems" identified in the LHA involving lack of perennial forbs, low levels of warm and cool season grasses need to be corrected. Also the problems with the presence of noxious weeds, and other invasive alien species, particularly cheatgrass needs to be more actively addressed.
703	I am cognizant of the fact that BLM manages its public lands under the principle of multiple use and sustained use, and must provide a balance between usage, and protection of its resources. It is my observation that BLM is doing a good job in managing livestock grazing, vegetation management for both logging and wildlife habitat, and in watershed protection.
739	Grass should be grazed to prevent height to curtail fire damage.
742	Public land should be used for the good of the public. Drill holes for coal mining, gas wells, logging should be allowed. Drill sites reclaimed, trees replanted. Grazing of cattle, sheep and the hunting of wild game encouraged.
752	We want to keep all our grazing rights, water rights, hunting rights and any other rights we were born with in this great country known as the "Land of the Free."
791	Must put multiple use first! More and more we are forgetting about the Taylor Grazing Act. Read that and remember that is why your agency was created.
903	I believe it should be open to mining, logging, ranching & drilling.
917	Another problem of BLM grazing allotments is that livestock are damaging riparian areas, specifically, in Jay Creek and Love Gulch. I'm not sure what can be done about this, short of temporary fencing which also has drawbacks, but would like to discuss with BLM and see alternatives in the RMP.
973	Increasing need to protect lands due to increasing drought and increasing demand and use by OHV's by restricting and limited OHV's and restricting and limiting livestock grazing.
998	Many uses can be compatible with preserving these systems if done carefully. Grazing, hunting and wildlife management should be done with more attention given to the health of the ecosystem than to the size of the "harvest."
1028	I request BLM consider the retirement of a vacant grazing allotment. The allotment for which this request is being made is the San Miguel Rim allotment located about six miles north of Norwood along the San Miguel Canyon Rim within the portion of the BLM currently designated as an Area of Critical Environmental Concern (see attached map). The allotment was last active in 1986, so there would be no impact on any current operations. As the map indicates, at the time the allotment was active the permitee owned the adjacent land and had an ongoing livestock operation. These lands were subdivided in about 1985 by the permitee and sold off as 35-acre residential parcels

Table C-23
Issue 3: Livestock Grazing

Comment ID	Comment
	and one larger 300 plus acre parcel, which is used as a residential parcel as well. About 10 of these parcels have an unfenced boundary with the BLM lands in this allotment. There are 709 acres of BLM lands included in the allotment, most of which are on very steep slopes that are not really suitable for grazing. It is likely that this allotment was created not because the lands within it were suitable for grazing, but as a matter of convenience for BLM and the permitee. The canyon rim created a natural boundary for the private land used in the livestock operation, but there was a narrow strip of BLM land between the private and the rim. In order to not have ongoing trespass issues between BLM and the permitee, this allotment was probably created. This was a reasonable management decision at the time. There are only about 130 acres of relatively flat land contained in the allotment. Most of this land has mature Pinion Juniper forest or sagebrush cover. Only about 40 acres has predominantly grassland cover. The rest has patchy and cool season bunch grasses intermixed in the sage and P J, which is heavily used by wintering mule deer and elk. The useable forage accessible to livestock is probably about 10 AUMs. The forage in these areas and on the hillsides is annually cropped close to the ground by deer and elk during the spring green-up. This, along with inevitable trespass conflicts with residential property owners, probably explains why there has been little interest expressed in this allotment since it was vacated 24 years ago and none in the last 15 years in which most of the residential development has occurred. The Norwood Land Health Assessment contains additional support for the retirement of this allotment. Although there were apparently no survey points located within this allotment during the LHA to characterize its current condition, some of the conditions noted in areas nearby upstream, may also apply. These include low perennial cool season grass cover (P. 63), low forb cover (P. 66), and cheatgrass (P. 70). It is not known if these situations occur on The San Miguel Rim allotment or if livestock were the causal factor in the adjacent areas, but I think the allotment in question could be valuable to BLM as a comparative to evaluate the impacts on allotments that are in use. As it has been largely vacant of livestock for 24 years, it could be used in evaluating differences in soil stability, plant density and diversity, and wildlife use in an area not used by livestock. Its value as a reference area exceeds its value as a livestock production area. In the ongoing RMP analysis, this area of BLM lands has been found to be eligible for Wild and Scenic designation with the most high quality "Wild" designation. One of the ORV s found in this segment is wildlife. The eligibility analysis states" The area in and around this section has been identified as an Important Bird Area by the Audubon Society, supporting a diversity of birds and containing regionally outstanding habitat for the Yellow-billed Cuckoo (*Coccyzus americanus*), a federal candidate species". This finding directs BLM to manage to protect this ORV to the extent possible. On the Norwood LHA (pg. 39) Biodiversity Focal Areas map, CNHP has also identified this area as a Biodiversity Conservation Area. The Norwood LHA (pg. 75) notes "winter range quality and quantity is declining in some key winter concentration areas ... " The area in this allotment is identified in the LHA figure 1.10 depicting crucial deer and elk winter range and bighorn sheep range as both Deer and elk severe winter range. In addition to not being cost effective for BLM to provide the staff resources to administer this allotment given it minimal utility for grazing, reactivation of this allotment would result in adjacent private property having to install miles of fencing in this important winter range to control trespass to the detriment of wildlife and at a cost to property owners of tens of thousand of dollars. Livestock also competes with wildlife for available forage. The combined use by livestock with the existing heavy use by wildlife risks overuse of the plant community leading to a decline in its value as wildlife habitat. Also, the allotment has significant amounts of weeds present, particularly in the dryland pasture area historically most used by livestock. The allotment has patches of Musk Thistle, Canada Thistle, Whitetop, and cheatgrass. Use of the allotment by livestock will increase the opportunity for weedy species to be spread along the canyon rim and potentially move from the rim down into the canyon. Another complicating factor is there is no access to this allotment except through another allotment or private lands, which further limits its utility. For the reasons elaborated above, I believe the use of this area, as an allotment should be re-evaluated. I believe it is no longer suitable as a grazing allotment and it would be more cost effective and better meet BLM management goals if it were retired.
1041	I always like to end my emails to the BLM with the friendly reminder that removing cattle from public lands will not affect the price of cattle by 1 cent in our grocery stores and that the noxious weeds are spreading at a rate of 5,000 acres per day.
1205	The 1989 Uncompahgre Basin RMP proposed that Needle Rock ACEC be unalloted for livestock grazing. CNAP recommends the continuation of this assignment.
1206	At Fairview ACEC, livestock grazing has been allowed to occur unless studies determine that endangered plant species or their potential habitats are being degraded. Sheep grazing on the ACEC was renewed as part of the 2008 renewal of grazing permits within the Colona Land Health Assessment area. As part of this renewal, BLM has been conducting quantitative monitoring on Fairview South over the past two years to assess potential impacts to

Table C-23
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Comment ID	Comment
	E.pelinophilum from sheep grazing. The Colorado Natural Areas Program was part of the team advising the design and implementation of this monitoring due to our involvement in monitoring of *E. pelinophilum* on the adjacent Wacker Ranch. Preliminary BLM monitoring results seem to indicate that sheep grazing on the ACEC may be having some negative impacts to both *E. pelinophilum* populations and their potential habitat (Charlie Sharp, pers. comm.). Additionally, the lessee who was grazing sheep on the Fairview South ACEC and surrounding BLM land accidentally trespassed onto state land by driving his sheep onto Wacker Ranch in early 2009. The impacts of having his sheep enclosed in the small 43-acre parcel are uncertain, but were not deemed beneficial to the rare plant preserve and were not within the Wacker Ranch management prescription.
1207	Livestock grazing can be a beneficial tool for land management, and CNAP generally supports multiple uses on Natural Areas as long as those uses are compatible with the protection of the significant features on the properties. However, it is our belief, based on both quantitative monitoring performed by the BLM and direct qualitative observations, that sheep grazing on the Fairview ACEC is detrimental to the *E. pelinophilum* population and its potential habitat in this case. Given that *E. pelinophilum* is subject to a wide array of threats throughout its range including development pressures, OHV incursions and climatic change, we believe that any additional pressures on this highly important population should be minimized or eliminated. Therefore, we recommend that the Fairview South ACEC (and any lands included in a potential expansion) be unalloted for livestock grazing.
1288	We graze our cattle on the Green Mountain and Grizzly Gulch allotments.
1289	We provide water to the guzzlers for the Gunnison Sage Grouse and the pipeline provides water to all wildlife in the area. We have a deferred rotation in place that is consistently monitored to meet objectives. We have participated in treatment projects to benefit the habitat for not only the Gunnison Sage Grouse but big game also. All of this has been done in concert with a multiple use resource plan that acknowledges the livestock industry in the Uncompahgre area boundaries.
1293	These data are mentioned to stress the importance of the livestock grazing and maintain economic viable ranches within the UFO. Livestock grazing is a sustainable use of the resource and it should be viewed as a program and not a problem. Too many times, because livestock grazing is the only controllable variable, it is penalized. The allotments have to maintain their economic viability or the entire ranch is in jeopardy. The credit crisis that faces this area worsens when the tenure of allotments become questioned. While we realize that grazing is not being eliminated in this plan, there is constant movement to reduce livestock grazing and to eliminate its importance on the landscape. This plan should acknowledge the importance of the constant presence that permittees have on the allotments, the economic contribution, the tie between the ability to use public land and open space of private ranch lands, the sustainability of livestock grazing on our grazing evolved ecosystems and the importance of many of the range improvements to wildlife populations.
1296	The Green Mountain allotment is home to the Crawford population of the GSG. Monitoring results indicate that the GSG vegetation guidelines are being met under our deferred rotation plan for cattle grazing. Additional permit reductions are not needed to meet guidelines. We are active members of the Crawford Sage Grouse Working Group and have been since the inception. The RMP should be written to acknowledge that livestock grazing is being managed in GSG habitats and objectives are still being met.
1298	Finally, our history of partnership, cooperation and willingness to work with the BLM has benefitted not only our livestock but the wildlife and the resource. This happens because of the commitment to the land and the resource that we have. The RMP should maintain that livestock grazing is an important use of the area; livestock grazing should not always be trumped by all other uses and should not be used as the only management tool that can be controlled.
1311	The Escalante Ranch is permitted use of numerous grazing allotments within the Uncompahgre Resource Area. Continued use of these grazing allotments is essential to the stability of the Ranch's operation. The Uncompahgre RMP should ensure that the Ranch's grazing preference rights and permits are fully protected.
1312	Along with protecting permitted livestock numbers, the Uncompahgre RMP should ensure that the Ranch has adequate access to its improvements on the federal lands, including fences, water developments, water rights, etc. It is important for the Ranch to be able to maintain these improvements to manage its use of the federal lands.
1634	Hopefully you will also consider grazing at some time during the future, many areas along the river are heavily overgrazed and overtaken with weeds.
1697	The UFO needs to make sure livestock grazing is done with best management practices, improving rather than degrading native ecosystems. Special care needs to be taken in riparian areas that are easily degraded by cattle, for

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Issue 3: Livestock Grazing

Comment ID	Comment
	instance Jay Creek and Love Gulch in the North Fork area.
1707	Please manage livestock grazing with great care. When hiking in the wilderness, these impacts are easily seen without effort, and visually appear devastating in a number of areas. Please work to protect these sensitive areas from over-grazing, while being sensitive to and understanding the needs of the ranchers.
1853	Grazing allotments should be managed with best range management principles in mind. The Management plan should incorporate Colorado's Standards for Public Land Health and Guidelines for Livestock Grazing Management. Sheep grazing should not occur where the spread of disease could be transmitted to the Bighorn Sheep herds.
2020	Grazing RMRI recommends that the RMP revise standards for grazing allotments to assure that AUMs do not exceed those necessary to meet or exceed Land Health Standards pertaining to vegetation and grasslands, as well as to assure that range is healthy enough to sustain wild ungulates, especially in times of drought. In a time of increasing climate change-induced drought it is critical that wildlife populations not be sacrificed by livestock overgrazing. Grazing allotments should be adjustable, according to changes in moisture conditions, and rotated if necessary. Cattle should be off the range in winter months.
2080	Designating these areas nonmotorized is further justified by the fact that these areas have managed to stay roadless for so many decades of mining, grazing and logging that there are likely good reasons why nonmotorized designations will not preempt other uses. For the most part these areas are mesas or ridge tops with poor access or little uranium potential.
2252	Grazing is a historical use that we value however a balance needs to be struck between the economics of grazing and land health and impact. We recommend that BLM increase its monitoring and managing of lands that are leased for grazing to impede negative impacts to water and vegetation.
2253	Ensure livestock grazing is done with best management practices, improving rather than degrading native ecosystems. Special care needs to be taken in riparian areas that are easily degraded by cattle, for instance the Jay Creek and Love Gulch in the North Fork area.
2254	Impact of grazing should be reduced where grazing degrades high-quality watersheds or wildlife habitat (e.g. winter concentration areas, fawning areas). Examples would be the San Miguel watershed and McDonald Mesa area between Crawford and Paonia.
2255	Unallocated and vacant allotments should remain such. More than 7% of land should be unallocated, and priority should be given to un-allocating lands that have had minimal grazing and that have good vegetation diversity and few weeds.
2605	We are currently litigating 18 RMP's for a wide range of defects including such basic issues is failure to consider a no-grazing alternative. The attachment Utilization Review looks at the common 50% utilization rate allowed and shows it is excessive. We also attach a review of livestock weights and forage utilization that must be taken into account in the analyses
2606	There must be an analysis of the impacts of the thousands of water developments for livestock, the thousands of miles of fences and their impacts on wildlife, the loss of riparian and wetland areas due to water developments nor the thousands of acres of watershed and plant community degradation that occur around livestock water developments. There must be an analysis of the watershed impacts from livestock grazing including the degree of loss of ground cover, the accelerated rate of erosion compared to natural conditions with intact plant and biological crust communities, the loss of ground water and watershed storage or the impacts on the Colorado River System and its endangered species. The Colorado River Salinity Control Act must be directly addressed in regards to livestock, erosion, sedimentation and salinity.
2608	Address livestock grazing and the science of management including that in the Appendices. Livestock have the most significant impacts on soil, water, wildlife and plant communities and ecosystems due to its near universal presence across the RA.
2609	No reallocation of forage should occur for livestock in allotments that have not been grazed except to reallocate that forage to watershed protection and wildlife.
2620	Fire and Fuels Management should include recognition of the role of livestock in fostering cheatgrass, juniper expansion, sagebrush expansion, weeds and invasives, and loss of biological crust. Livestock should not be grazed in areas where cheatgrass exists or areas that are susceptible to cheatgrass invasion.

Table C-23
Issue 3: Livestock Grazing

Comment ID	Comment
2621	Lands not available for livestock grazing should include areas with soils subject to moderately high to high erosion by wind and water and slopes over 30% in addition to the areas listed. Riparian areas should be placed off limits to livestock due to the severe degradation and the need to "accelerate restoration" as required by FLPMA. Tinkering around with Rangeland Health and PFC assessments with their inherent subjectivity and bias or riparian stubble height measures which are universally abused and have not proved effective is a flawed approach. These should be abandoned in favor of definitive actions and quantitative based monitoring with comparisons to reference areas instead of kicking the can down the road while the land, water supply and wildlife suffer for more decades.
2622	10% of the Field Office should be excluded from permitted livestock grazing in order to serve as controls.
2623	The following sections provide additional comments and scientific information which the RMP must consider in its planning and analysis. Livestock Grazing In 2004, WWP submitted a review of livestock grazing management science to all Field Offices and the State Office in an effort to have BLM incorporate the best available science into its range management. A copy of that document is included with these comments. In addition, an update of the AUM forage consumption value to reflect current livestock weights was completed in 2009. This analysis is also attached. It shows that the forage values BLM uses underestimate forage consumption by livestock such that taking into account the most current information on livestock weights would automatically reduce current permitted numbers in each allotment and pasture by 1/3. WWP has also reviewed the impacts of livestock on water quality, watersheds and riparian areas showing that the impacts are well understood.
2624	Additional concerns with livestock grazing are the destruction of soil crusts and removal of soil stabilizing vegetation, thus impairing soil and microbiotic function. Such functions as nutrient cycling, water infiltration and storage are drastically altered. By grazing livestock on the sensitive and erodible soils found in the RA, BLM is impairing watershed function, creating salinity problems in the Colorado River, which is in opposition to the Colorado River Salinity Control Act. This also results in the impairment of habitat for sensitive, threatened and endangered fish. It is BLM's obligation to research and provide citations and a summary of this research that clearly documents the role of livestock grazing within upland and riparian ecosystems in altering watershed function as well as water quality, and delineate what particular practices will be followed to protect water quality, including effectiveness monitoring. For example, sediment load and turbidity increase from watershed inputs, instream trampling, disturbance and erosion from denuded streambanks, reduced sediment trapping by riparian and instream vegetation, loss of bank stability and increased peak flows from compaction. Fine sediments increase in depositional environments (pools, quiet water areas) from the increased erosion and spawning gravels are made unusable due to high sediment content (Belsky and Uselman, 1999). White et al (1983) found sediment yield 20-fold higher in a grazed watershed when compared to an ungrazed watershed. USDA (1981) reported that topsoil erosion rates from grazed forest and rangeland were 4.2 tons/acre-year and 3.1 tons/acre-year compared to less than 1 ton for healthy forest and range. Packer (1998) documented that loss of soil in Utah and Idaho watersheds through erosion and runoff increased as ground cover decreased. A decrease in ground cover from 40% to 16% resulted in 6 times more runoff and 5.4 times more sediment yield. Trimble and Mendel (1995) estimated that peak storm runoff from a 120 ha basin in Arizona would be 2 to 3 times greater when heavily grazed than when lightly grazed.
2625	Even under moderate stocking rates, grazing contributes to the deterioration of soil stability in deserts (Warren et al. 1985) , thus leading to increased soil erosion. Soil erosion is further exacerbated by increased surface runoff triggered by loss of vegetative cover and litter (Ellison 1960) , both of which have been shown by numerous studies to be reduced by livestock grazing. Numerous studies have observed severe erosion in the western United States when comparing heavily grazed areas to ungrazed sites (e.g. Cottam and Evans 1945 , Gardner 1950 , Lusby 1979 , and Kauffman et al. 1983). Furthermore, there are a number of extensive literature reviews on this topic that describe the indisputable impact of livestock grazing on soil stability and erosion (see Gifford and Hawkins 1978 , Fleischner 1994 , and Jones 2000). The Lusby study cited here was conducted on tributaries of the Colorado River and demonstrated the significant change in sediment delivery and runoff in a watershed that was closed to livestock grazing when compared to its paired watershed that continued to be grazed.
2626	The effects of surface disturbance by livestock on soils, biological crusts and plant communities as they interact with wind must be analyzed in an appropriate model that takes into account ground cover, shrub and forest cover, erosion factor, wind patterns and speed to determine the impacts on ambient air quality and human health in nearby communities, National Parks and the region from particulate pollution. This analysis must include consideration of all other surface disturbing activities such as recreational vehicles, normal traffic, oil, gas and mineral exploration, development and production activities. In addition, the release of greenhouse gases (CO2 and CH4) and other organic or inorganic pollutants must be calculated and modeled to determine the impacts on air

Table C-23
Issue 3: Livestock Grazing

Comment ID	Comment
	quality, climate change and global warming, wildlife and human health in a like manner. For example the report recently released by the United Nations, Livestock's Long Shadow, shows that the greenhouse gas emissions from livestock are greater than that from transportation.
2627	The BLM should conduct a capability analysis to determine the areas that might be available for livestock grazing, excluding steep slopes >30%, low forage production
2629	The role of livestock grazing in establishing infestations of cheatgrass or other flammable conditions such as increasing juniper expansion, sagebrush expansion and increasing fuel loads must be addressed and the costs and benefits evaluated. The recent book, Wildfire, by George Wuerthner explores this topic in great detail and its content should be included in the analysis.
2630	As described above, stocking rates and grazing systems must take into account the precipitation and forage production elements with proper stocking rates based on utilization rates that are sustainable. The DEIS must present an allotment by allotment summary of current monitoring information that describes the trend or condition as compared to the existing RMP. Claims of streams and riparian areas in PFC ignore that PFC is a minimal classification that does not address the wildlife habitat attributes of these most important areas, water quality or instream habitat for fish. In addition, springs, seeps and wetlands condition and trend are not described. Where is the analysis of utilization and annual stocking rates? The DEIS must propose science based utilization standards for upland and riparian areas, stream bank stability standards or other critical livestock management mechanisms. The DEIS must provide specific monitoring requirements to satisfy the FLPMA mandate for effectiveness monitoring.
2631	Livestock grazing within arid regions of the west have damaged 80% of streams and riparian ecosystems (USDI 1994a) . Impacts from livestock grazing include affects to soils, vegetation, stream hydrology, channel morphology, fisheries, riparian-dependent wildlife, water quality, water temperature, and sedimentation (Belsky 1999) . However, between 60-80% of birds and other wildlife species are dependent on support from riparian habitats for food, nesting, cover, shade, shelter, breeding and water sources (Ohmart 1996 , Chaney et al. 1990 , Thomas et al. 1979). With similar attractions, studies have found cattle spend between 5-30 times as much time in these highly productive riparian zones which can supply up to 81% of the forage consumed from only 1.9% of the allotment by area (Roath and Krueger 1982 , Skovlin 1984). Saab et al (1995) concluded that 46% of the 68 neotropical migrant birds which utilize riparian habitat declined in abundance in response to livestock grazing. Nutrient concentrations from livestock urine and manure can accumulate within grazed streams, reducing dissolved oxygen and aquatic species composition (Schepers et al. 1982 , , Taylor et al. 1989). Livestock trampling and vegetative removal along streambanks results in increased erosion, wider channel widths, and sedimentation of streams also reducing habitat quality and biodiversity of fisheries, amphibians, and invertebrates which serve as prey bases for other wildlife (Belsky 1999). Studies have found that use of proper grazing systems such as rest-rotation, seasonal, or deferred grazing, reduced stocking rates and fencing away from stream corridors can reduce grazing impacts from cattle within riparian areas unless topographic limitations force them to remain in riparian zones (e.g., Clary and Webster 1989 , Elmore and Kauffman 1994 , Burton and Kozel 1996 , Weller 1996), but no grazing system was compatible with a healthy aquatic ecosystem (Meehan and Platts (1978) .

Table C-24
Issue 3: Forestry

Comment ID	Comment
324	issues/concerns? wood cutting,
368	Since the 1980's I bought Green sheet, commercial firewood permits and pole permits, furnishing all my own expenses until I got too old to work. Now the Government is going pay other people to do what I paid them to do.
369	If Beetle Kill is not harvested within 2 or 3 years it will be too rotten, even for wood, esp. if it goes to the ground. In summary I would suggest you give it to people, instead of destroying it w/ fire. Thanks
370	Clear cut anywhere old or bug infested trees, including pinon by giving people the wood to cut it! FREE, no expense to Government. Also clear cut all cedars or junipers infected with mistletoe that is spreading fast, killing trees.
372	Put the timber and trees to sawmills or timber cutters to utilize the products by subsidizing the sawmills- wood-processing plants etc./ Give to any one- individual or group, whatever they could cut & haul.
377	Firewood and timber are also important for our community.
382	People should be allowed to get firewood from standing dead trees, or downed timber.
422	Issues/concerns? Future of biomass as alternative fuel source for energy.
424	Beetle kill- no action unless usable for biomass future.
425	SAD- action before root kill as best science I'm aware of.
705	I am cognizant of the fact that BLM manages its public lands under the principle of multiple use and sustained use, and must provide a balance between usage, and protection of its resources. It is my observation that BLM is doing a good job in managing livestock grazing, vegetation management for both logging and wildlife habitat, and in watershed protection.
738	Old growth should be harvested before it burns or spreads disease.
741	Public land should be used for the good of the public. Drill holes for coal mining, gas wells, logging should be allowed. Drill sites reclaimed, trees replanted. Grazing of cattle, sheep and the hunting of wild game encouraged.
792	After 100 years of fire suppression and the belief of a few that older is better we must stall more timber use, fire use brush control to get back to what is truly natural, i.e. varying ages of trees.
902	I believe it should be open to mining, logging, ranching & drilling.
2081	Designating these areas non-motorized is further justified by the fact that these areas have managed to stay roadless for so many decades of mining, grazing and logging that there are likely good reasons why non-motorized designations will not preempt other uses. For the most part these areas are mesas or ridge tops with poor access or little uranium potential.

Table C-25
Issue 3: Wildland Fire Management

Comment ID	Comment
131	TMW encourages the BLM to actively address the managing of fuels in order to prevent wildfires. Protecting the Values should be aggressively pursued with prescribed burnings and mechanical fuel reduction that will directly affect the current fuel conditions and future fire behavior.
348	Wildfire risk mitigation work in Specie Creek Road area on BLM lands adjacent to road to create egress. This is the only egress from Specie Mesa should a wildfire occur in the Saltado/Specie Creeks/Specie Mesa region. Also some invasive species in this are including mistletoe.
373	Stop burning up natural resources as it has NOT stopped the Beetles.
406	If public lands are going to maintain both animal and plant diversity, management is critically important. We need to be closing roads not making new ones. We need to be protecting water sources, springs, streams and rivers. We need to return to a more natural rhythm in fire control.
421	Issues/concerns? Revamping fire management plans
426	Fire control- limit to 1/4 mile at public land-private land interface- at mandatory shared expanses (govt. and private owners). Limits on logging, mining, etc.- that interfere with natural fire cycles. No action without request by private owners.
465	I would encourage the use of land treatments for management of wildfires and to increase habitat for wildlife and livestock. There are many areas within the Plan. Area that could benefit from Pinyon/Juniper control etc. Of course any treatment would have to be evaluated upon individual merits of each treatment.
554	I commend the UFO on their use of fire use on BLM lands. This policy has greatly benefited big game in the UFO. The RMP should include policy to continue fire use where it meets all resource objectives. The RMP should also specify that all wildfires and prescribed burns that occur in areas that lack a sufficient natural seed source should be reseeded with a mix of native grass, forb, and shrub seed. The reseeded areas must then be rested from livestock grazing for a minimum of two years following the fire to ensure successful seedling establishment. Areas with known infestations of aggressive invasive species should not be treated with fire or mechanically treated until pretreatments have been successfully done to prevent further infestations. Any projects that create or aggravate infestations of invasive species should be aggressively treated to control those infestations.
662	WUI: We are thankful for the good working relationship between the Hotchkiss Fire Dist. and BLM, and acknowledge both organizations have worked to build this partnership. Some areas of improvement can be achieved: BLM should follow NIMS practices by better accommodating and utilizing local resources on WUI incidents, and actively engage in integrating local management personnel into their system. Also, we have been working for years to begin fuel reduction projects near Hotchkiss, and are hopeful that these beneficial projects will begin soon. We're pleased and confident in the personnel BLM has in place for these tasks, both in years past and presently. HFD is going to provide them as much support as is asked for, and trusts BLM will also support this team and effort.
663	Consider becoming more NIMS compliant, not by edict, but by stepping up to integrate local resources. By leadership.
1943	Analysis of impacts will consider potential interaction between management decisions and changes in the larger social and ecological context. In particular, impacts will be analyzed to consider potential interaction with larger-scale dynamics such as climate change; proliferation of invasive species, insects, disease and wildfire; exurban development; changing recreational patterns, and the like.

Table C-26
Issue 4: Lands and Realty

Comment ID	Comment
2778	Land Tenure Decisions: BLM has identified land tenure decisions as an issue to be addressed in the Uncompahgre 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. With the growing population has come a desire to develop more land, some of which may be appropriate. However, the BLM must retain land near sensitive and ecologically important areas, including those within existing or proposed ACECs or other special management areas, and including specifically citizen-proposed special management areas. lands identified in new citizen proposals for open space and/or other special management that include lands not owned by BLM should be given priority for acquisition. BLM should only pursue land tenure decisions if they will serve the national interest by supporting key values and resources, such as protecting ecologically important areas and providing open space. In addition, disposal or exchange may be appropriate where the BLM determines that lands will be dedicated to renewable energy development, if those lands are already degraded, closest to the load served for siting development, and can be sold or exchanged with a commitment to obtain lands with higher conservation values (such as wildlife corridors). Given the current population trends within the region, BLM should reconsider all previous decisions in the Uncompahgre RMP for disposal of public lands and re-evaluate whether or not those decisions still meet the needs of the public. As the agency moves forward it will be crucial that consideration be given to providing adequate open space and trails on public lands. Furthermore, as local entities are in the process of developing plans for such uses, the relationship between the RMP and these plans will be important, since BLM's decisions can affect local open space, parks and trail plans. Particular care should be taken to prevent sale or exchange of BLM parcels highly valued by local communities for the open space, wildlife habitat, and recreation opportunities they provide. Recommendations: 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.
91	Energy throughout the Western US is heavily dependent upon delivery which means access to and from the energy sources whether it be natural gas, coal or even wind farms. Corridors for railroads, electric transmission lines, pipelines for natural gas transportation and access roads should receive high priority for consideration and evaluation. Permitting of these rights of ways can and does take years. GEC encourages BLM to develop procedures to evaluate and approve energy related access in an efficient and timely manner.
27	Please keep me apprised of all information concerning Land Disposal Parcels included in the new RMP. I am an adjacent private landowner of an isolated parcel which was identified in the previous RMP for disposal. It is identified in Appendix B, Category I Disposal Tracts #26, a total of 240 acres identified as difficult and uneconomic to manage. More specificial1y: T. 14 S., R 93 W., Sec 17: SW 1/4SW 1/4; Sec 19: E 1/2NE 1/4; Sec 20; NE 1/4NW 1/4 and W1/2NW 1/4. I Below is personal information: Landowner Name: Barney & Co., LLC Anne K. Sievers, manager Address: 29504 Redlands Mesa Road Hotchkiss, CO 81419 Telephone #: (970)872-3438 Email Address: x7rranch@tds.net Email is acceptable format for corresponding with me concerning this.
28	If possible, BLM inholdings, specifically tracts which are isolated and surrounded by private property should be sold. Adjacent landowners to these parcels should have first priority in purchase. This would eliminate BLM cost in administering these isolated small parcels. As stated above, adjacent landowners should have priority for purchase. This action would remove the public access to the isolated parcels. This would eliminate conflict between private and public lands, such as trespassing and fencing.
113	While exact locations for ROWs for utilities, roads, railroads, cannot be specifically identified until an exact facility location is identified, these ROW's will be necessary, and should be considered as this resource management plan proceeds.
123	We would like to identify a parcel of land for disposal. The description of the BLM land is NW1/4 NW1/4 Section 24 T.46N. R.8.W located in Ouray County. It is our understanding we need to identify the parcel before it can be traded or sold.
142	land tenure adjustments working in conjunction with the Wildland-Urban Interface process can solve many access issues that arise from urban encroachment. We have experienced many situations where if the possibility

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Comment ID	Comment
	to secure key property necessary by land trades or purchase would greatly enhance recreational opportunities and preserve open spaces for recreation. Active participation in land trades or selling BLM property would solve and alleviate many land use issues.
191	I also feel more land needs to be made available for the publics good, including resource exploration, powerline construction, and general community uses.
193	I am aware of the proposed powerline from Peach Valley to Flat Top and know several property owners who have had a constant battle with the power company and the BLM regarding where this line will be located. I have been told the BLM wanted the power line to cross PRIVATE land and not go on BLM land. This is very questionable as the power line will cost more to construct as easements will need to be purchased from all the private land owners, landowners will have a power line in their back yards, thus reducing the value of their property. All these additional costs will be passed on to the consumers, who as the economy stumbles, are in no shape to absorb un-necessary increases in their power bills. By putting this on adobe BLM land, everyone wins, with the exception of the ultra-conservative environmentalist who favors plants over people, hardship over prosperity.
197	The BLM should reconsider the tracts near the City of Montrose identified for disposal (Unit 3). These tracts should be kept under public ownership, and used for open space and non-motorized recreation.
200	Trailheads should be built on large BLM tracts near the Montrose city limits (Unit 3) to allow recreational access without requiring driving to the trailheads. Some of these trailheads will require access across private lands. The BLM and local government jurisdictions should work to acquire, or re-acquire these accesses (some may be public roads that have been encroached upon).
224	Lands within the proposed Curecanti National Recreation Area boundary in areas 2 and 4 should not be authorized for disposal or leased for oil, gas, or mineral development.
229	The lands being proposed for addition to Curecanti National Recreation Area should be appropriately classified so they are not disposed of or otherwise leased until such time as Congress can act (please refer to the Report to Congress for the Curecanti Resource Protection Study).
233	All or portions of eleven (11) Reclamation projects are within the planning area and could be affected by decisions made during this RMP or could affect your decisions. These are all valid existing rights pursuant to the Reclamation Act of 1902, as amended and supplemented. The following project have been constructed and are in operation: the Uncompahgre Project; the Lower Gunnison Salinity Unit (Gunnison Unit) of the Colorado River Basin Salinity Control Project (CRBSCP); the Aspinall Unit of the Colorado River Storage Project (CRSP); the Smith Fork Project; the Paonia Project; the Dallas Creek Project; the Fruitgrowers Dam Project; and the Paradox Valley Unit (CRBSCP). Two Projects, the Fruitland Mesa Project (authorized for construction) and the Dominguez Project (not authorized for construction), were never constructed but have outstanding land withdrawals associated with them. Reclamation's management goal for the nine active projects is the continued operation, management, and protection of those projects and their associated features and resources. We will continue to periodically review the current withdrawals for our authorized projects and assess the potential need for those lands. We would like to revoke the withdrawals associated with the Dominguez and Fruitland Mesa projects and return those lands to the public domain.
236	Recognizing valid existing rights.
239	Identification of Reclamation lands- The table on page 3 of the Preparation Plan did not list any Reclamation lands within the planning area. However, a portion of the listed BLM, Forest Service, National Park Service, and State lands are, in fact, Reclamation lands.
245	Authorized and constructed projects- In general, Reclamation will retain sufficient withdrawals and rights-of-way for our authorized and constructed project purposes and features. Reclamation may need to obtain some additional rights-of-way or withdrawals to properly cover its facilities. BLM should help ensure that Reclamation lands, both acquired and withdrawn, are properly identified with the respective agency roles and responsibilities pursuant to the 1983 IA.
246	Authorized, but not constructed projects- The Fruitland Mesa Project was authorized but not constructed and has about 22,780 acres of associated withdrawn public domain lands. Pursuant to the 1983 IA, these lands are under Reclamation's administrative jurisdiction, however, BLM has been managing these lands since their withdrawal. Reclamation continues to recommended revocation of these withdrawals. Pending the revocation

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Comment ID	Comment
	of the withdrawals, we would like to provide for continued BLM management of these lands without the need to consult with Reclamation.
247	Not-authorized projects- Reclamation continues to recommended revocation of the approximately 12,220 acres of withdrawals for the Dominguez Project within the planning area and the return of those lands to the public domain.
248	Withdrawals- The RMP should address how Reclamation withdrawn lands will be managed upon their return to the public domain. Reclamation will continue to conduct periodic reviews of its withdrawals and assess the potential need for those lands. Currently within the field office area, there are about 45,790 acres of land withdrawn for Reclamation purposes.
249	Disposals- Some of the proposed disposal tracts from the current RMP are withdrawn for Reclamation purposes. Disposal of Reclamation withdrawn land is subject to a Reclamation determination that the lands are no longer necessary for its purposes and subsequent action to make the land available for disposal. The effects of any disposals on potential selenium loading to area waterways should be a primary consideration
250	Rights-of-way- Reclamation has several rights-of-way on BLM administered lands and needs to acquire additional rights-of-way. Non-project use of these rights-of way should be compatible with Reclamation project purposes and have Reclamation concurrence for such use.
259	Energy transmission corridors- Reclamation and BLM should coordinate routing of energy transmission rights-of-way in a manner that minimizes effects to Reclamation facilities and resources
350	Small, non-contiguous parcels of sub-surface mineral estate owned by the federal government should be examined for disposal in the region. For instance, just west of Saltado Canyon in the Specie Mesa area there are numerous fractured parcels that are not large enough to allow creation of a oil/gas unit and access issues will also prevent development. Further, most recent lease prices have been very low for these parcels with few bidders. This is all before the onset of massive development of unconventional shales in Marcellus, Barnett and elsewhere. In summary these subsurface parcels are essentially useless to the federal government. They should be identified for disposal to the highest bidder, or exchange, and the revenue used for much higher value BLM uses.
439	In recent years there has been increased activity through our access point. It is the only one that people can walk or ride their bikes to directly from town. There are other entrances across private land but they do not have formal easements. Ours is limited in what is allowed to cross. The previous owner limited the access to pedestrians and bike riders only. We have no problem with limiting motorized access and hunting access through this gate. We are sorry that dogs are limited, though.
466	I have concerns with gas pipeline and powerline right of ways and the surface disturbance that it causes. Many of these right of ways are not properly rehabilitated and need further work done on them as far as reseeding and weed control is concerned.
529	Energy corridors should be planned as narrow as feasible and, when possible, should coincide with existing routes to minimize environmental damage.
562	We would be agreeable to and have allowed bikers and hikers to access and exit the BLM thru a single trail on our property as long as they stay on the trail and stay out when muddy. Mountain bikers are colorful, quiet and gone in seconds - this is good and bad as a horserider/hiker like my wife may not always see or hear a biker approaching. In general people have been respectful of each other.
570	I am concerned about tenure plans relating to a tract of BLM land in Section 4, T 50 N, R 6 W and sections 33 and 34, T 51 N, R 6 W in Montrose County, Colorado. We own and ranch about 2200 acres adjacent to this BLM tract on its west, south and east. We currently hold the Adobe Grazing Allotment (#5027) for 24 AUM's of cattle grazing on this tract. I urge the BLM to retain this tract for the following reasons: 1. A plant species that is ranked as "imperiled both at global and state levels" exists on this tract. (See attached sheet that is a page from a Baseline Documentation Report prepared in 2007 by Rare Earth Science, LLC on our deeded property adjacent to this tract.) The plant is known as Rocky Mountain Thistle (Cirsium perplexans). The Baseline Study covered only our deeded land, hut the existence of the species is widespread on the BLM tract. 2. After a 300-acre Conservation Easement donation that should close this month, 1,295 acres of our 2,200-acre ranch will be limited to agricultural use FOREVER with no sub-division or residential structures permitted. It is our plan to restrict development on most of the rest of our ranch with similar conservation easements. Much has been

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Comment ID	Comment
	invested to preserve this sizeable block of property for agricultural, wildlife and visual values. Federal tax deductions and state tax credits are publically-supported encouragements to preserve special lands such as this. The public has a vested interest in preserving this ranch. The 340-acre tract of BLM land referenced above is an integral part of this ranch. We graze it in May when it is most important for us to keep stock off our irrigated hay meadows. While our Adobe Allotment is for only 24 AUM, the fenced parcel provides a corridor from our more productive House pasture in sections 32 and 33, T51N R6W, with our Tyler pasture in sections 3 and 4, T50N R6W. The BLM property also fulfills critical habitat requirements of some of the multitude of wildlife species that inhabit this ranch. Species found here include mountain lion, black bear, elk, mule deer, bobcat, badger, coyote, red fox, beaver, muskrat, raccoon, mink, shorttail weasel , porcupine, whitetail prairie dog, mountain cottontail rabbit, sandhill crane, wild turkey, ringnecked pheasant, bald eagle, golden eagle, red tail hawk, raven, turkey vulture, magpie, great homed owl, Canadian geese, mallard duck and cinnamon teal, great blue heron. This ranch is also historically significant. Enclosed is a copy of our 2009 family Christmas letter. In it we relate some of the ranch history that we have been able to verify. In the event the above-referenced BLM tract was divested, we would try to acquire it, but most likely it would go for subdivision prices. It would be difficult, probably impossible for us to pay development prices for 24 AUM of pasture, but the loss would be great for Rocky Mountain Thistle, the Double H Ranch, wildlife and the public.
649	I also feel more land needs to be made available for the publics good, including resource exploration, powerline construction and general community uses. I am aware of the proposed powerline from Peach Valley to Flat Top and know several property owners who have had a constant battle with the power company and the BLM regarding where this line will be located. I have been told the BLM wanted the power line to cross PRIVATE land and not go on BLM land. This is very questionable as the power line will cost more to construct as easements will need to be purchased from all the private land owners, landowners will have a power line in their back yards, thus reducing the value of their property. All these additional cost will be passed on to the consumers, who as the economy stumbles, are in no shape to absorb un-necessary increases in their power bills. By putting this on adobe BLM land, everyone wins, with the exception of the ultraconservative environmentalist who favors plants over people, hardship over prosperity.
654	A number of Western's facilities, including transmission lines, communications sites, and switchyards, as well as the access to them, are located within the administrative boundaries of the Uncompahgre Field Office. The locations of these various facilities are shown on the enclosed map series. Western asks that the Uncompahgre Field Office recognize these facilities in the RMP as existing valid uses of public lands including the right of ingress and egress, and where the possibility of replacing, upgrading, or reconstructing these facilities will continue to be allowed. As renewable energies are developed and brought to market, some or all of the new generation will require the addition of new or upgraded transmission lines. Western's facilities could be impacted by the growth of this new energy industry, so we want to ensure we can make any upgrades or add new transmission facilities as they are needed.
657	Finally, some of our linear transmission line rights-of-way continue beyond the boundaries of the Uncompahgre Field Office and are subject to the management decisions of other BLM field offices or US Forest Service ranger districts. Western requests that decisions made by the Uncompahgre Field Office be consistent with similar decisions concerning utility rights-of-way and energy corridors made by adjacent field offices or ranger districts. Decisions related to our facilities need to be seamless from one office to the next and local solutions should be integrated as a whole for transmission line rights-of-way or corridors that traverse more than one administrative jurisdiction. The problem is a real one when different field offices/ranger districts do not recognize and manage a transmission line corridor consistently from one jurisdiction to another.
658	Land Transfer: Most of the areas around Hotchkiss depicted by the map showing potential land disposal parcels are fine. The parcels chosen are surrounded by private lands, have access, and can be developed or purchased by citizens for conservation purposes resulting in better land stewardship than BLM has been able to provide. Ownership of lands, particularly the hodgepodge of public and private lands in this area complicates firefighting. One parcel chosen needs to be examined closely with the Town of Hotchkiss, and may be taken out of the proposed sale because there may be a needed ROW to correct water problems. (Map within text could not be saved here)
659	Making these lands [areas around Hotchkiss depicted by map] available to ownership by private citizens will increase the local tax base, and will allow for better management of the lands than BLM has been able to provide.

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Issue 4: Lands and Realty

Comment ID	Comment
690	The recently designated Westwide Energy Corridor may intersect or impact Gunnison Sage Grouse habitat. If so, the RMP should consider and disclose how protection of grouse will be reconciled with uses approved in this corridor.
691	The BOCC has reviewed a map provided by BLM of the parcels identified for disposal in San Miguel County. A review of ownership of some of the disposal parcels by our GIS staff suggests several of these parcels are no longer in BLM ownership. As some of the disposal parcels are in Gunnison Sage Grouse habitat or otherwise may be of interest/concern to the county, we would like to arrange a meeting with your realty staff to confirm the current status of these parcels. This would aid the County in making specific recommendations to the BLM going forward.
734	I don't like the idea of you regulating or changing my property.
886	Land Tenure: An area unsuitable for major utilities and road rights of way is the Roubideau. This canyon area is a water source, historic site of petroglyphs and other ancient artifacts, heavily used and overgrazed by livestock and contains a very diverse range of wildlife inhabitants up and down the entire ecosystem including bear, mountain lion, numerous year round and migrating raptors, songbirds, reptiles and amphibians, deer, elk, and rodents. I haven't even begun to look at the amazing plant life.
1196	Finally, one thought should be mentioned here, but please don't misconstrue our underlying intention in doing so. Because of the small and isolated nature of the 40 acre parcel, its physical connection to the Town, and considering the Town's interest in protecting and enhancing this portion of the river corridor as a contiguous passive use area, the Town would be amenable to discussing possible ownership of the tract if and when BLM should ever elect to dispose of it. We offer this for consideration only because of the resource constraints that may challenge the federal agency in maintaining such an isolated parcel. Very simply, the municipality may be better positioned to provide the maintenance and stewardship.
1212	CNAP supports the continuation of closure of Needle Rock ACEC to the development of major utility facilities.
1213	Fairview ACEC is designated as open to development of major utility facilities, except pipelines, so long as there would be no disturbance of threatened or endangered plant species or their potential habitat. Given the range-wide threats to *E. pelinophilum* that were described above, CNAP would encourage the BLM to review this designation and consider whether any potential developments within what may be the most significant population in the world of this listed plant should be allowable. If, however, major utility facilities are allowed in the Fairview South ACEC, CNAP would be available to assist with providing mitigations to minimize potential impacts to *E. pelinophilum*.
1216	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. Additionally, CNAP would like to introduce the idea of potential acquisition of the Wacker Ranch Natural Area by the BLM to consolidate the management of this significant population of *E. pelinophilum*. This idea is one that CNAP would be interested in discussing with BLM staff to assure that it was appropriate for all parties involved and would result in better protection of the federally listed plant.
1231	Land use management decisions (including the disposition of, or transfer of federal land ownership) need to carefully be analyzed to prevent increased erosion, sediment transport and/or deep percolation of water that can mobilize salts and selenium.
1238	State of Colorado in cooperation with Federal, State, Local and Tribal agencies operates a statewide public safety communications system known also as Digital Trunked Radio (OTR) system covering the Uncompahgre RMP area. DTR provides capability for public safety interoperable communications for many agencies in the RMP area. It may be important to include the DTR system capabilities and requirements in the RMP. DTR provides capability for public safety interoperable communications for multiple jurisdictions and governmental agencies (Emergency Medical Services, Law enforcement, fire protection and other governmental activities) in the RMP area. Concern is providing locations on BLM lands throughout the RMP area for communications sites and vehicle access to these sites.
1247	Tri-State Generation and Transmission Association, Inc (Tri-State), is the wholesale electric power producer/supplier to DMEA. DMEA is adamantly opposed to any restrictions which may result in unnecessary and increased costs to Tri-State, and ultimately DMEA consumers, for the access, maintenance and repair of existing transmission facilities, and unreasonable limitations of siting new facilities on public lands.

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Comment ID	Comment
1248	DMEA electrical facilities are not depicted on the utility corridor maps provided on the RMP website. DMEA requests that all existing electrical facilities and infrastructure, whether they are distribution, subtransmission or transmission; or owned by DMEA or Tri-State; be mentioned and given consideration in the RMP revision planning process. DMEA can provide system maps of distribution facilities within our service territory for inclusion in the planning process.
1249	Private lands located within the Uncompahgre RMP area have the potential need of electrical service sometime in the next 20 years. Many of these private lands are either adjacent to or surrounded by public lands, and electric utility rights-of-way to the private lands should be considered and provided for in the revised RMP
1251	To allow existing ROWs to be used to the greatest extent possible while limiting the proliferation of separate utility ROWs, we request that the revised RMP contain language which allows existing lines and facilities be considered for future upgrade and/or expansion.
1252	DMEA requests that the revised RMP contain language which allows for the consideration of future electric facilities within the boundaries of the revised Plan area. Working with DMEA on both the Delta County Transmission Improvement Project and the East Montrose Electric System Improvement Project, you are aware that the public strongly desires public utilities serving the public good be constructed on public lands wherever possible. Through individual landowner contacts, public communications & meetings, the public has been strongly opposed to providing private property ROW for a public improvement project such as ours when public lands are relatively nearby and available. We request that BLM include provisions in the RMP revision which allows new utility projects be considered with appropriate and reasonable mitigation measures.
1253	DMEA has joint use on numerous communication sites on public land within the Uncompahgre RMP planning area. Communication is vital in providing and maintaining a safe, reliable and secure interconnected electric system. All existing telecom sites must be protected in the revised RMP, along with the access roads getting to those sites. Also, the expansion of existing communication sites, or the addition of communication sites associated with utility facilities, should be open to consideration through the ROW grant application process.
1254	As you know, DMEA is in the preliminary design phase of a hydro-generation facility to be located along the South Canal. When constructed, a transmission/sub-transmission line will be required between this renewable energy resource and the new East Montrose Substation (near Project 7 and Miguel Road). It is too early in the planning and design phase of the project to hold public meetings to site the line, but DMEA requests that this project be given consideration in the Uncompahgre RMP revision process.
1255	DMEA also recognizes that other potential renewable energy projects may exist within our service territory, such as wind and solar. DMEA requests that rights-of-way grant consideration be given to connect them to the existing electrical infrastructure.
1256	Although long range growth forecasts are available, it is impractical to predict if and when that growth will actually occur, what the power needs will be for businesses coming in to support the growth, and at what locations the growth might actually occur. Therefore, DMEA strongly requests that BLM work closely with all utilities to identify potential energy corridors, to recognize that future energy requirements can change over time, and that if identified corridors do not meet the actual delivery needs at that time, thoughtful and careful consideration to a more suitable route will be given.
1257	DMEA appreciates the opportunity for comments to be considered and included in the revised Uncompahgre Resource Management Plan. As the process moves forward, we respectfully request that DMEA be contacted to discuss any potential issues that may directly impact our ability to construct, maintain, and/or repair electric lines to provide safe, reliable service to our members. We look forward to working with the BLM through the revision of its Resource Management Plan.
1292	In addition, ranches associated with public lands own 24% of the private land in the above mentioned counties. That is a significant number of acres of open space, public land buffers and wildlife habitat. Private ranch lands allows for even greater benefit to be realized from the public 'lands due to the economic contribution, open space and buffer zones.
1313	As the BLM knows, the boundary lines between the BLM lands and the Escalante Ranch private lands have not been adequately surveyed. The BLM's RMP should address this issue and should include authorization for the BLM to respond to survey land and boundary corrections through land exchanges, purchases, and other land adjustments.

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Comment ID	Comment
1314	Access to private land surrounded by BLM lands should be protected through the RMP process.
1320	We are a Colorado limited liability company in the uranium and vanadium business with significant property holdings, much of which is mineral rights on BLM-administered lands. We appreciate the opportunity to provide input for your revisions to the RMP.
1321	Our largest concern is the protection of property rights under the laws of the land.
1325	As pointed out in your fact sheet, the U.S. Department of Energy (DOE) has 32 lease tracts containing ~25,000 acres located within the Uravan Mineral Belt in southwestern Colorado. There is an obvious reason; the land is uniquely mineralized with uranium and vanadium.
1339	Western Area Power Administration (WAPA) transmission lines, Kinder Morgan TransColorado Pipeline, and West Wide Energy Corridors are depicted on the Utility Corridors map provided on the RMP website. Tri-State wholly and partially owned and maintained transmission facilities encompassing varying mile lengths within the UFO RMP boundaries, and approximately 156 total miles of transmission line are situated within the boundaries of the UFO study area.
1340	Tri-State and other utility corridors within the planning area are not depicted on the utility corridor maps. As a major stakeholder in the RMP revisions, Tri-State believes that mention or depiction of Tri-State facilities, as well as, those of our Member cooperative Delta Montrose Electric Association should be considered for planning purposes and identified on the utility maps. Tri-State would be willing to send the BLM our facility GIS data files to be included in the planning process and analysis.
1341	Tri-State would like to actively engage with the BLM on any and all planned and future utility or electric infrastructure construction and maintenance projects to ensure an open dialogue and thorough review of the issues.
1342	It is critical that Tri-State is able to maintain access rights to our transmission and substation facilities within the Planning Area.
1344	Access should be allowed in coordination with the BLM for new facilities and ROWs within the planning area. As a manner of standard operating procedure and as per requirements, Tri-State minimizes disturbance to the greatest extent feasible.
1345	Existing transmission lines and associated facilities are located within the boundaries of the planning area. We urge the BLM to continue to allow valid existing rights and uses, such as existing and planned utilities to be considered with appropriate and reasonable mitigation measures.
1347	Additional utility corridors and communication sites associated with utility facilities should be considered and open to consideration through the current ROW Grant application process. Tri State would like to engage with the BLM early and often on this RMP revision to identify areas that should be restricted from major utility and road rights-of-way (ROW) in order to preserve natural and cultural resources, as well as, limiting impacts to viewshed and public recreation areas. Tri-State and other energy development should be allowed to continue in appropriate areas within the planning area. Energy development is critical to public safety and interest and the continuous, reliable, low-cost availability of electric power so vital to our member distribution cooperatives.
1348	Special consideration should be given to utility facilities because of their critical role in public health and safety, and the Wildland Urban Interface and fire hazard potential. Care must be taken to protect the forest from transmission line fires and protect the transmission lines from fire as mandated by NERC/FERC vegetation management authority. Tri-State would like to engage the BLM in these discussions to foster a greater understanding of the other federal compliance standards for generation and transmission facilities and to allow for effective, efficient, and consistent standards for operating and maintaining transmission rights-of-way.
1349	The RMP scoping materials include reference to land swaps for utility ROWs to preserve other areas that have higher biological resource value. Would the BLM begin, as a part of this process, to identify potential or existing utility corridors and areas of private land that could be swapped for utility corridors? How would this be determined and how would this affect permitting of new facilities and land rights? How would this coincide with the West-Wide Energy Corridors? Would the BLM facilitate land swaps for the utilities? Tri-State encourages the BLM to work closely with the utilities as these potential areas are identified to ensure any alternatives selected are feasible, given the utilities planned and future energy requirements with the understanding that energy requirements can change over time in different regions. It is important to understand that corridors identified by the BLM, may not meet the utilities delivery needs. Tri-State encourages the BLM to engage all

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Comment ID	Comment
	stakeholders early in the planning process when identifying areas where development might be unsuitable because of other resource objectives. The RMP should balance resource protection and the need for energy development.
1350	The West-Wide Energy Corridor Programmatic EIS identified corridors for the supposed use of electric utilities. Ultimately, the corridors selected did not coincide with the input from electric utilities and generally appeared to be locations that agencies deemed as acceptable based on their land use constraints. Although the efforts to identify corridors for multiple uses and co-location are appreciated, many of the corridors were disconnected and not situated with geographical regions that Tri-State and members would deem useful. The West-Wide Energy Corridors identification effort was a large and noble endeavor, but has not yielded any meaningful opportunities for the location or construction of electric facilities and should continue to be assessed by including electric utilities in a cooperative and coordinated effort.
1849	Utility corridors should be aligned with respect to ACECs, WSAs and any other environmentally sensitive areas.
2065	Most of the land bordering the river is under public ownership and river flows are highly regulated by the McPhee Dam.
2287	We encourage the BLM to hold preliminary discussions with local jurisdictions (including fire departments) about land parcels BLM is considering offering for sale or exchange.

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Issue 5: Cultural and Heritage Resources

Comment ID	Comment
135	TMW is well aware of the multitude of cultural resource sites within the UFO. Sometimes the management practices applied toward the ACECs also apply to cultural & paleontological areas. We would like too strongly point out that to enjoy along with preserving such sites does not always consist of boots on the ground in the immediate area of such sites. Many of these sites can remain preserved and still be viewed from a distance.
136	TMW would entertain a collaborative effort in helping the BLM in signage and educational tools in and around such areas. For the most part our experience shows that vandalism of sites is much less likely to occur with proper education and information.
527	Because of the numerous archeological sites on the slopes of the Uncompahgre Plateau, care should be taken to preserve these areas. It has been demonstrated that development of trail heads to major points of interest as well as interpretive signage serve to protect them from vandalism. Greater use of the volunteer adoption program already in place would be of considerable advantage.
871	Cultural & Paleontological Areas & Sites: To manage and protect them, I think areas close to town need supervision, even if this means high fencing with concertina wire and locked gate, open only at specific times of the year. If a civic group took charge of caring for the area on a volunteer basis, they promote its value to others, and it means a great deal to them. People become passionate about something they are caring for. A program similar to the highway cleanup might work---where a family or group of people take responsibility for a section of highway and cleanup trash--they get a sign posted on the highway. There are many sites that are difficult to access by road and then walking, they can stay that way. I have found that these remote/hard to get to areas do not have as many human visitors, and those that make it to these special places tend to treat them with respect.
991	I am also thrilled with the amazing archaeological remains found in the area, and the spectacular views, and wish to see them preserved as much as possible.
1185	This parcel on Oak Hill is surrounded on three sides by a purchased conservation easement on Jim Young' s property. This was the first conservation easement in the county's Land Heritage Program. The county open space program would appreciate an opportunity to work with the adjacent land-owner and BLM to try to protect this parcel. If it were developed it could have an impact on the surrounding easement.
1868	Cultural Resources There are a number of archeological sites with significant cultural value found within the portion of the Dolores Corridor within the planning area. As an example, a number of immense petroglyph panels can be found on a few boulders and in a small finger canyon of Wingate Sandstone along the northern side of the Paradox Valley west of Bedrock. BLM should inventory this area, if it hasn't already, and should develop management prescriptions designed to protect these resources. The broader conservation group comments we referenced and incorporated earlier contain extensive recommendations on planning and management guidance for cultural resources.
2057	Cultural Resources There are a number of archeological sites with significant cultural value found within the portion of the Dolores Corridor within the planning area. As an example, a number of immense petroglyph panels can be found on a few boulders and in a small finger canyon of Wingate Sandstone along the northern side of the Paradox Valley west of Bedrock. BLM should inventory this area, if it hasn't already, and should develop management prescriptions designed to protect these resources. The broader conservation group comments we referenced and incorporated earlier contain extensive recommendations on planning and management guidance for cultural resources.
2071	Importance of less-roaded lands Due to their less-roaded condition these areas may be among the few left on the landscape where vegetation is relatively intact, where forage, soil, water courses, archeologic, paleontologic and historic resources are relatively undisturbed and where wildlife security, silence, solitude, quiet use, hunting, wildlife viewing and other such qualities can still can be found.
2086	We also sketched impressionistic boundaries around several of Colorado Natural Heritage Program Potential Conservation Areas to see if there was any overlap. This showed that in at least two cases PCAs intersect or are adjacent to unroaded areas and could be combined to make a larger protected area.
2209	The BLM did an excellent job addressing management of cultural and paleontological resources in its management plan for the Gunnison Gorge NCA. The UFO RMP should mimic that management approach. Cultural resources are non-renewable and should be managed for permanent protection
2299	Cultural an Paleontological resources have very little meaning if access is denied to view or enjoy these links to

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Issue 5: Cultural and Heritage Resources

Comment ID	Comment
	our history. This is also true when considering historic travel routs. This is dear to my heart. I like to travel and observe thing from the past. The national plan seems to want to restrict public enjoyment of these kinds of historic sights. What use is preserving this heritage if only special interest groups or people are allowed access.
2405	In 1976 I first travelled through this area, a memorable journey on Highway 90 that took me from the San Juan Mountains to the canyon country of southern Utah. Since that time the natural and cultural values of Southwestern Colorado have been dear to me. For the family it goes back farther than that as my grandfather first visited the area around 1910 working on the railroads and continued to return to fish the Gunnison river until his death in the 1980's.
2520	Particular attention should be paid to preserving cultural and paleontological resources. I support a limited and thoughtful development of public displays of cultural artifacts such as rock art and paleontological resources such as fossils and dinosaur trackways to encourage public appreciation for and involvement in the protection of these resources, if such development is careful not to unnecessarily expose these resources to possible vandalism and loss of scientific value.
2581	So little of The West is still in the state when Lewis and Clark and the other explorers journeyed the frontier. We must preserve what little is left of our natural and national heritage for the enjoyment and benefit of our children, grandchildren and all future generations of Americans. I t is ours and their link with our history.
2645	I have walked these and other national wilderness and national park areas since I was a young teenager. I am carrying on this legacy by ensuring that both of my children are active in not only enjoying these areas but in efforts to protect and expand them. Our natural areas are our true legacies to our progeny and we must remain ever vigilant lest we lose these areas forever.
2720	This land was enjoyed by my Father...who was born in 1895...I hope that we will never see unconscionable development which destroys the beauty and value of the land and animals which depend upon that land for their subsistence. We need to cherish, not destroy through greed and insensitivity to our planet.
2828	FLPMA obligates the BLM to protect cultural, geologic, and paleontologic resource values (43 U.S.C. §§ 1701(a)(8) 1702(c)). In the context of historical and cultural resources, the National Historic Preservation Act of 1966 ("NHPA") (16 U.S.C. § 470 et seq.) affords heightened protection to these resources, establishing a cooperative federal-state program for the protection of historic and cultural resources. In particular, the review process set out in Section 106 (16 U.S.C. § 47Of) obligates the BLM to consider the effects of management actions on historic and cultural resources listed or eligible for inclusion under NHPA. Additionally, Section 106 requires the BLM to consider the effects of its management actions on all historic resources and to give the Advisory Council on Historic Preservation an opportunity to comment before the BLM takes action. Section 110 of the NHPA requires the BLM to assume responsibility for the preservation of historic properties it owns or controls (16 U.S.C. § 470h2(a)(1)), and to manage and maintain those resources in a way that gives "special consideration" to preserving their historic, archaeological, and cultural values. Section 110 also requires the BLM to ensure that all historic properties under the jurisdiction of the field office are identified, evaluated, and nominated to the National Register of Historic Places. Id. § 470h-2(a)(2)(A). Further, the President's "Preserve America" initiative (See Exec. Order 13287, March 3, 2003) requires the BLM to advance the protection, enhancement, and contemporary use of its historic properties. The BLM must ensure that "the management of historic properties in its ownership is conducted in a manner that promotes the long-term preservation and use of those properties as Federal assets." Therefore, the Uncompahgre Field Office must carefully consider the effects of all RMP decisions on the archaeological and cultural values located in the planning area. Since it will be difficult to evaluate the effect of decisions when the location of cultural resources is unknown, the BLM should undertake an archaeological inventory wherever necessary. One area within the Uncompahgre Field Office with known cultural resources is the northern side of the Paradox Valley west of Bedrock. A number of immense Petroglyph panels can be found on a few boulders and in a small finger canyon of Wingate Sandstone there. BLM should inventory this area, if it hasn't already, and protect these resources in the RMP. In regards to travel planning, the BLM should consider where motorized and non-motorized routes are directing people, inventory cultural resources along those routes, and carefully consider the potential impacts to those resources. Specifically, BLM should evaluate whether dust from vehicle use, energy development, and other authorized uses is impacting Petroglyph panels. Furthermore, dust suppressants have been shown to impact rock art in Nine Mile Canyon, Utah. 19 These impacts must be analyzed and minimized. Recommendations: BLM's goal should be to protect, conserve, and where appropriate restore archeological and historical sites and landscapes. To that end, BLM should:

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Issue 5: Cultural and Heritage Resources

Comment ID	Comment
	• Survey all known or discoverable cultural and historic sites, or those adjacent sites may be adversely affected. • Determine the sites or areas that are most vulnerable to current and future impact and adopt management actions necessary to protect, conserve, and restore cultural resources. • Complete a Cultural Resource Management Plan that coordinates with the objectives of the RMP and seeks to provide for an appropriate proactive process of inventorying for cultural resources, making determinations of eligibility for the National Register, and seeking to nominate eligible properties to the National Register. The RMP should establish a timeline for completing the Cultural Resources Management Plan, and prioritize areas to be inventoried for cultural resources. • Outline specific management actions, such as stabilization, fencing, signing, closures, or interpretative development, to protect, conserve, and where appropriate restore cultural resources. • Adopt measures to protect cultural resources from artifact collectors, looters, thieves, and vandals. • Consult with the Native American community to determine whether there are sites or specific areas of particular concern, including sites of traditional religious and cultural significance. 19 Kloor, Keith. "Dust Storm Rising Over Threat to Famed Rock Art in Utah." Science 319 (2008): 394. Available online at http://www.ninemilecanyoncoalition.org/ninemilestudy.pdf.

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Issue 5: Paleontological Resources

Comment ID	Comment
2072	Importance of less-roaded lands Due to their less roaded condition these areas may be among the few left on the landscape where vegetation is relatively intact, where forage, soil, water courses, archeologic, paleontologic and historic resources are relatively undisturbed and where wildlife security, silence, solitude, quiet use, hunting, wildlife viewing and other such qualities can still can be found.
2210	The BLM did an excellent job addressing management of cultural and paleontological resources in its management plan for the Gunnison Gorge NCA. The UFO RMP should mimic that management approach. Cultural resources are non-renewable and should be managed for permanent protection

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Issue 6: Socioeconomics and Environmental Justice

Comment ID	Comment
93	This is also true for the social and economic evaluations for the area. Both resource quantities and economics for the Resource Area should receive a thorough evaluation.
110	NEPA requires that both the environmental and economic effects of identified activities be analyzed within a resource area. While the environmental effects are often most closely scrutinized during the NEPA process, the economic effects and impacts of resources decisions must also be considered equally with the environmental effects. We encourage the BLM to conduct a thorough economic analysis of current coal and other minerals activities in the RMP to document what we believe are very positive effects to the custom, culture and economic vitality of the communities in this resource area.
117	We would like the BLM to consider the economic benefit that natural gas exploration and extraction has on local, regional, and national economies, and the benefit from having a broad-based economy for the North Fork of the Gunnison River valley, the Roaring Fork valley, the Uncompahgre River valley, and the Grand Valley.
152	In the same way, the economic and social benefits must be quantified and weighed by the I.D. team and the deciding officer in order to reach a quality Record of Decision.
206	The BLM should actively solicit input and involvement by the Montrose Economic Development Council, the Montrose Chamber of Commerce, and the Montrose Visitor's and Convention Bureau. These organizations should more actively promote the recreational opportunities near Montrose, which would encourage sustainable and economically beneficial uses.
272	Historically, the County's economy and way of life have been very dependent on the extractive resources available on public lands. This historic economic dependency continues in the areas of mineral extraction, agriculture and timber harvesting. More recently, natural gas development, tourism and recreation have increased and contributed to a more diverse local economy. The degree and manner of public and working access to the BLM lands and mineral resources will undoubtedly be changed through revisions to the BLM management plan. The County would like the BLM to respect the economic dependency on the current level of these diverse uses and access to BLM property and minerals. The County would request that a comprehensive cost benefit analysis be conducted as part of the RMP revision process to address the impacts of various resource management policies and practices on the local economy and surrounding areas. The multiple use of BLM lands and development of BLM minerals is important to Delta County residents to insure continued support of the basic economic foundation of Delta County.
277	Given the unique recent and ancient history of human habitation in the area and the hardy and vibrant native flora and fauna, I strongly support RMP directives that encourage sustainable use of this landscape over extraction or exploitation of its resources. While the latter tends to produce immediate and lasting degradation of scenic beauty and ecosystem function, the stewardship of the former can support both healthy local economies and future generations' enjoyment of the Uncompahgre Plateau.
333	This area is the only preserved land area that is able to support uncontaminated agricultural economic development, i.e. orchards remaining in the state.
336	Ensure community and agricultural development. Not oil and gas development. They're all economic development. Please start with com. & ag.
365	Administration should work more with the local communities; towns; counties, and state. To help sustain local needs and multiple use.
477	This comment is referring to the economic effect of energy and mineral development on local communities. Energy and mineral development has an economic benefit to local communities. Development typically provides well paying jobs and pays local and federal taxes, royalties, and fees. Dollars spent locally stay within the community helping to build up local businesses not directly associated with the development companies. Employees of the development companies and the associated contractors and consultants enjoy local restaurants, buy groceries, shop in local stores, buy or rent homes, which all helps to keep money within the community.
479	This comment is regarding economic implications associated with both the permitting process for energy or mineral development and the selection criteria for Wilderness and Wilderness Study Areas. When reviewing the impacts of energy and minerals development on the environment the economic benefit to the local and federal economies should be weighted in the decision to allow or restrict the development. There is a great economic benefit to local communities and government from taxes, royalties, and employment whether it is

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Comment ID	Comment
	from employees of the development company or the numerous associated suppliers, contractors, or consultants.
480	The economic value of lands selected as Wilderness Study Areas or Wilderness should also be considered and weighted as part of the selection criteria for Wilderness designation. The economic value should consider, but not be limited to the minerals, energy (coal, gas, oil, solar, biomass, wind, etc.), merchantable timber, guided tours (jeep, hiking, fishing, hunting, etc), and livestock grazing. Both the current and future economic values should be considered.
569	Closing off roads and ending construction of new roads in the proposed areas would eventually kill off all Natural gas development, coal mining and logging in western Colorado, resulting in the loss of around 3000 jobs in the mining industry alone. It is necessary for these industries to build primitive roads on BLM land just like they have been doing for many years to drill small bore, exploratory test wells to tell them which way to proceed. To block the use of BLM land for these things would eventually turn Western Colorado into an economic wasteland. Yes I do object to this plan.
571	Thank you for including Montrose County Government in your considerations for Montrose County Socio-Economic impacts of Montrose County on the BLM, and the BLM on Montrose County. The two are deeply intertwined and in fact, inseparable both as to the lifestyle we enjoy as well has several business ramifications using the resources of the BLM on the West and East flanks of the Uncompahgre National Forest. In these contemporary times, it is increasingly clear that Montrose County has not fully arrived at Montrose County's practical potential as a legitimate recreational playground for the local population. Montrose County can be a destination recreational site for the traveling USA, World, public, seeking that which they cannot find anywhere but in Montrose County BLM Lands. You and the Uncompahgre Forest account for 74+% of the land-mass in Montrose County. The BLM and Montrose County have, for example: • Mineral sources +Various biomass sources (timber->chips) • Remarkable variety of recreational uses (motorized->bicycle->foot) & Hunting • Ecological preservation & continuance of flora and fauna • Scenic Vista's • Grazing for domestic and wild creatures Water Management Montrose • County's transportation plan (connectivity of the East and West portions of Montrose County) • Catastrophe mitigation on BLM, National Forest, and the East and West portions of Montrose County proper. • AND much more.
572	This being said, the BLM Lands are an integral part of Montrose County becoming a destination vacation area as well as our trademark lifestyle. Using that which is given and made available on the BLM and the National Forest connected by a all season road from the West of Montrose County to the East thoroughly enhances recreational and commercial ventures in all of the BLM and Private Lands in Montrose County. The BLM Lands in Montrose County will contribute to a strong national, state, and local economy through the holistic use of the resources available now and soon to be in the future. Our security as a nation is also tied to these very concepts. To put a price on these values is not possible, their value is immeasurable for obvious reasons. To create jobs that originate in Montrose County have a much larger multiplier impact than those that don't, but secondary jobs are an essential contributor.
576	Montrose County is completing our own socio-economic study which will be available soon which Montrose County will gladly provide a copy of said.
604	The Uncompahgre RMP Planning should be coordinated with Montrose County in order to be compatible with the Montrose County Master plan revision currently underway.
606	Fees for business uses (mining, grazing) should more than compensate BLM for administrative and land maintenance costs involved. I am not opposed to fees for recreational users, but believe fees/costs to businesses should be increased first because private profit is being made off of public land. BLM should be treated as a "shareholder" by collecting some additional dollar amount on the resources consumed or extracted from public land.
667	San Miguel County is sixty-two percent public lands, much of which the surface or subsurface estate is managed by BLM. Public lands playa critical role in our economy and in defining the character of our county. Our economy is largely dependent on, and substantially a result of, the public lands in our county. According to 2003

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	Region 10 economic data (published in a 2006 Region 10 report by Levy), 23% of our jobs are from tourism, 13% derived from second home spending, 20% from construction (of which 9% is second homes), and 21% from services which includes real estate services. This constitutes most of our economy. Our ability to attract tourists, service professionals, and entrepreneurs that use cyber technology to support their businesses, depends on maintaining the character of the region. These are the people that support the services, real estate, and construction industries. Access to natural amenities is frequently cited as the reason these people chose to locate in or visit San Miguel County.
668	San Miguel County is committed to working with BLM to maintain the character of our region. BLM management policy plays a key role in this endeavor. We believe a sustainable economy in San Miguel County is best served by a BLM management policy the places a priority on maintaining the natural integrity of BLM lands and the lands their sub-surface ownership has influence over. Local governments have expended great effort to protect air quality, water quality, visual character, wildlife, and natural systems where they have jurisdiction. We hope BLM will set the same priorities in the management of their lands.
680	As stated previously, San Miguel County believes the interests of the County and the public at large are best served by BLM lands maintaining their natural ecological integrity. Extractive uses of BLM lands have resulted in boom and bust cycles and left indelible scars on our public lands. Historic, and perhaps current, livestock management practices have also contributed to degrading or perpetuating the degradation of our public lands. These activities, along with travel management, have all contributed to the conditions described in the LHAs.
760	Roadless regulations are poor management practices for continued economic sustainability of Western Slope. Same for WSA.
761	Economic development of coal resources should be encouraged for local, state and national energy security.
853	Also, our ranch has a USDA All Natural Grass Fed Beef label. This label goes on all of our retail cuts sold in stores. The use of poisons on surrounding grazing allotments conflicts with the sustainability of the ranch and its economic well being.
906	Support jobs
932	If this project should go forward, this will become a place that will not be dealt with and become a wasteland with more regulation, closing of the area. Far reaching outside the scope of this. Loss of jobs and businesses within the affected area. This club has also sent 3 Cancer kids to a camp every year. This club will dissolve will no longer send these kids to camp.
1177	The RMP/EIS should consider socio-economic impacts to the local communities. The reasonably foreseeable development evaluation should address the additional loading that could be placed on local communities' abilities to provide necessary public services and amenities. Such impacts may include housing and school needs for project workers and families, burdening existing waste and wastewater handling facilities, and increased road traffic with associated dust and hazardous material spill potential. Methods to avoid or minimize such impacts should be discussed.
1178	Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," applies to federal agencies that conduct activities that substantially affect human health or the environment. In accordance with this order, the RMP/EIS should disclose and evaluate any environmental justice concerns associated with impacts to rural low-income communities from the resource management activities and the potential build-out for the reasonably foreseeable development analysis. Close coordination with any potentially impacted Native American tribes is encouraged. If there are no applicable environmental justice considerations, then that should be disclosed.
1246	Within this service territory [Delta County (excluding the City of Delta) and in portions of Montrose, Gunnison, Mesa and Ouray Counties] DMEA currently operates and maintains 3,213 miles of energized line (distribution and transmission). In the last ten years alone, the number of active meters has grown nearly 25% from 25,893 to 32,321.
1291	The livestock industry within the boundaries of the UFO contributes millions of dollars to the Montrose, Mesa, Delta, Ouray and San Miguel counties. This industry is steady in its contribution to the economy and is not victim to the boom and bust cycle often experienced in other sectors of the economy.
1294	These data are mentioned to stress the importance of the livestock grazing and maintain economic viable ranches within the UFO. Livestock grazing is a sustainable use of the resource and it should be viewed as a

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	program and not a problem. Too many times, because livestock grazing is the only controllable variable, it is penalized. The allotments have to maintain their economic viability or the entire ranch is in jeopardy. The credit crisis that faces this area worsens when the tenure of allotments become questioned. While we realize that grazing is not being eliminated in this plan, there is constant movement to reduce livestock grazing and to eliminate its importance on the landscape. This plan should acknowledge the importance of the constant presence that permittees have on the allotments, the economic contribution, the tie between the ability to use public land and open space of private ranch lands, the sustainability of livestock grazing on our grazing evolved ecosystems and the importance of many of the range improvements to wildlife populations.
1300	Any such event in our watershed would be devastating to our private property rights and our agricultural enterprise. My wife and I raise certified organic fruit on 36 acres on Rogers Mesa west of Hotchkiss, in Delta County. Our pristine irrigation water flows from the flanks of Grand Mesa where gas exploration is anticipated. I know we speak for many of our neighbors and other farmers - organic and conventional, fruit, vegetable, and animal. We are all potentially adversely affected by natural gas development on Grand Mesa.
1301	Responsible management of BLM resources includes protecting the needs and interests of private landowners who might be affected by activities occurring on your land. We request that the Resource Management Plan revision protect our right to continue to earn a living from our land; a way of life that, not incidentally, is healthy for the environment, our neighbors, and our community.
1309	Historically significant. For more than a century, the North Fork Valley has been renowned for our exceptional fruit that was shipped across the Nation. More recently the North Fork has been recognized as a region of national significance for organic agriculture, second only to the entire State of California. The quality of our air, water, and soils, as well as the skill, tenacity, industriousness, and ingenuity of our farmers, are largely responsible for our premier fruit. Nevertheless, agriculture is threatened in the North Fork largely by competing land uses.
1310	Endangered species protection. Natural gas exploration on BLM land is yet one more such threat. Were the farmers of the North Fork 'four-leggeds' we might very well be regarded as 'endangered' and significant efforts to protect our habitat and survival would be mandated in BLM's process. People are animals, too; we should not be discriminated-against simply because we walk on two legs. I urge you to give protection to the existing, historic, and environmentally compatible land uses of your private-landowning neighbors.
1328	More locally, we know you have heard loud and clear the desire for increased uranium mining from people who actually live in western Montrose and San Miguel counties. Their economic livelihood has been dependent upon uranium for generations. Frankly, there is not anything else that can be reasonably expected to replace the basic "bread and butter" economic activity of uranium.
1696	There are economic benefits to the community in preserving wild lands. These benefits need to be evaluated and quantified when considering impacts on present and future generations.
1706	The Town of Ridgway and surrounding community benefits greatly from our open lands and recreation areas, in all respects. Please consider these lifestyle, quality of life, and business/economic impacts and opportunities for our region.
1779	Any oil and gas development allowed under the RMP should be carefully constrained, subject to phased development that minimizes damage to unique natural features, essential wildlife habitat, and other sensitive areas and restores the land to its original condition once it is exploited. The RMP should impose strict limits on uranium and other mining to protect our land, air and water including restoration to its original condition.
1786	I guess the first that comes to mind is the decision to dam the Hetch Hetchy valley in Yosemite National Park. Then there was the attempt to dam the Green River in Dinosaur National Monument. There has been the continued exploitation of redwood trees and the the creation of Lake Powell to name just a few. In all these cases, short term goals took precedent over long term ideals. Even though the examples above are different than what is proposed here, the decision to enter these pristine lands and exploit them for their natural resources was based on short sighted interests with no attention paid to what would be lost.
1818	Administration should work more with the local communities and towns, counties, state. To help sustain local needs and multiple use.
1907	A comprehensive analysis of the socio-economic benefits of natural gas and oil development activities in the area should be included in the analysis. It may seem counter-intuitive to BLM's planning team, but oil and gas

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	development on public lands actually improves the environment in numerous ways. Royalty revenues from oil and gas development underwrite the conservation of wildlife habitat, national parks, refuges and recreation areas. In fact, the oil, natural gas and mineral programs fund virtually all of the conservation and preservation work of the Department of Interior! The analysis of alternative must include a comprehensive analysis of the benefits of oil and gas development.
1944	Analysis of impacts will consider potential interaction between management decisions and changes in the larger social and ecological context. In particular, impacts will be analyzed to consider potential interaction with larger-scale dynamics such as climate change; proliferation of invasive species, insects, disease and wildfire; exurban development; changing recreational patterns, and the like.
1976	A comprehensive analysis of the socio - economic benefits of oil and gas development activities in the area should be included in the review. In addition to lease rentals and royalty payments, state and local taxes also need to be identified and incorporated into the benefits analysis. Specifically, a discussion analyzing the costs of administering the minerals program and industry's financial contributions to local, state and federal treasuries is necessary.
2025	Economics The SRCA letter cites numerous studies supporting the economic benefits of undeveloped land. It is recognized that recreation opportunities provided by wilderness quality lands 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 - http://www.census.gov/prod/2008pubs/fhw06-co.pdf). 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 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.
2028	The river supports a variety of economic and recreational activities that benefit nearby communities. Working farms and ranches, professional outfitters anglers, historians, river runners, hikers, archeologists and recreationists all share an interest in preserving the Dolores River Basin.
2056	We also urge reclamation and restoration of past uranium mining scars within the planning area.
2059	Socioeconomic Analysis The Socioeconomic comments and studies submitted within the broader conservation group comments should be considered for the relevant portion of the basin within the UFO's jurisdiction.
2127	In terms of the economic impacts of hunting and fishing within the six counties partially or wholly falling within the UFO management unit, the total impact (defined as direct expenditures and CDOW expenditures in support of hunting and fishing) reached $165,400,000 (11% of the state total) in 2002. Hunting and fishing in these six counties also accounted for 2,180 jobs (11% of the state total) in 2002. These robust numbers for hunting and fishing opportunity and economic impacts elucidate the tremendous value of public lands in the UFO management unit. It is of vital importance that the UFO RMP includes a strong commitment to maintaining the invaluable fish and wildlife habitat and hunting and fishing opportunities for all lands within the management unit administered by the BLM.
2184	Our members value intact natural ecosystems that maintain their pre-Columbian constituent species in natural abundances. Protected natural ecosystems on public lands are the last refuges of many threatened, endangered, and dwindling species. These ecosystems provide valuable natural resources and ecosystem services, such as water collection and purification systems and carbon sinks that protect against global warming. For the

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	communities in and nearby the UFO, they are the basis of a renewable, vibrant recreation economy. The economic benefits to the community of preserving wild lands should be evaluated and quantified, and possible harm to these benefits should be carefully evaluated when considering mineral extraction, logging, grazing, or other projects that disturb wild lands.
2313	I have been an organic gardener here, in Paonia, for the past 15 years. I moved here because of the clean water and air, the growing season and the close proximity to road less and wilderness lands.
2328	What is done in the Pisceance is ENOUGH.
2380	And finally what land is opened for exploration etc. must be restored to something approaching its original condition under supervision from the wilderness society with enforcement provisions.
2705	The BLM and Forest Service have code words that disguise their plans to serve corporate America: 1) enhance social values, 2) maintain community stability and 3) job creation. If any of these 3 terms are mentioned in the Uncompahgre RMP, please send me the electronic link to the RMP.
2843	Socioeconomic Analysis The BLM must do a full analysis of all of the socioeconomic consequences of each alternative for the Uncompahgre RMP. We previously submitted detailed comments to EMPSi for consideration in the socioeconomic analysis for the Uncompahgre RMP revision. Those comments, which are attached to this letter in Appendix 2, address a wide range of often overlooked socioeconomic issues that the BLM must consider in addition to estimating jobs and income from commodity extraction on the lands in the Uncompahgre Field Office. The attached comments provide detailed discussions of several socioeconomic issues that must be considered when the BLM does its analysis for the Uncompahgre RMP. These include a discussion of the issues associated with economic-base theory and its application for predicting impacts from land management, recommendations that the BLM look at trends in total personal income and employment in order to see a more complete picture of the Uncompahgre region's evolving economy, a discussion of the importance of using economically recoverable resource estimates for oil and gas in order to avoid overstating the potential impacts of such development, a discussion of the economic benefits of wilderness-quality lands, and a recommendation that the agency do all planning analysis based on realistic budget assumptions. These socioeconomic analyses are necessary for the BLM to adequately and equitably assess the socioeconomic impacts of the Uncompahgre RMP alternatives. We recommend that the BLM use a total economic value approach that includes the estimation of nonmarket values for the wildlands and open spaces in the Uncompahgre planning area. BLM recently affirmed its commitment to this approach in draft IM 2010-061, which explicitly directs managers to evaluate non-market values in RMP analyses. We will be submitting comments to BLM on this draft IM, and we will be happy to provide the Uncompahgre Field Office with a copy of our comments because this issue is especially relevant to western Colorado communities. The total economic value analysis should include the full range of non-market values, including use values - such as recreation - as well as non-use values such as existence value (the benefit one gains just knowing wildlands are protected), option values (the benefit of knowing that one can visit a wildland for recreation) and bequest values (the benefit gained from knowing that wildlands are protected for future generations). Also included in Appendix 2 are two socioeconomic scoping briefs and The Wilderness Society's recent report, Natural Dividends: Wildland Protection and the Changing Economy of the Rocky Mountain West. The first scoping brief, entitled "Socio-Economic Framework for Public land Management Planning: Indicators for the West's Economy," details our expectations for the baseline analysis of the region's economy as well as the analysis of the potential impacts of proposed management alternatives on the area. This brief describes the changing economy of the Rocky Mountain West, and the role that public lands can play in bringing economic diversity to the communities of the Uncompahgre planning area. The second brief, entitled "The Economic and Social Impacts of Oil and Gas Development," describes the significant and often hidden costs associated with oil and gas drilling. The analysis in the RMP must include an assessment of these costs in order to describe net (rather than gross) benefits of any proposed oil and gas leasing. We request that your analysis of socioeconomic considerations in the Uncompahgre Resource Area follow the approach set out in these documents, as well as the more specific considerations detailed in our attached comments. Recommendations: The RMP should evaluate non-market values provided by wildlands, per BLM's commitment set out in draft IM 2010-061. BLM should utilize the materials included in Appendix 2 to inform the RMP's socioeconomic analysis and ensure a full accounting of the costs and benefits of each of the alternatives.
2767	Please do not let the BLM make any plans. Some of their employees have taken bribes from big oil/profiteers. Americans do not trust these agencies anymore, which are in the pocket of big time profiteers who are out to

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	ruin America. American taxpayers spent years paying to buy this land and BLM is only listening these days to these rich profitteers to ruin it.

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2787	Health Impact Assessment The BLM Should Conduct a Health Impact Assessment. 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: "it 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."3 The BLM should do the same in the EIS for the Uncompahgre 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. A HIA looks at all the possible health effects from a decision, including contaminants and air pollutants but also water contamination, accidents and injuries, alcoholism and substance abuse, mental health impacts, and more. Not only is this approach used by U.S. and international health agencies, but it is used by the oil and gas industry itself in overseas operations.4 Just last year, the BLM incorporated a full HIA into an oil and gas Draft EIS in Alaska. 5 A comparable approach should also be undertaken for oil and gas development for the Uncompahgre Field Office. The National Environmental Policy Act (NEPA) intends that human health be thoroughly considered in any Environmental Impact Statement. Congress stated that It , "... it is the continuing responsibility of the Federal Government to use all practicable means...to improve and coordinate Federal plans, functions, programs, and resources to the end that the Nation may....assure for all Americans safe, healthful, productive and aesthetically and culturally pleasing surroundings.." and ",..attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences..."6 NEPA implementing regulations direct agencies to consider "the degree to which the proposed action affects public health or safety."7 These regulations also state that Federal agencies shall to the fullest extent possible "Use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment."8 3 letter from EPA Regional Administrator, Region 8, to State Director, Bureau of land Management, Wyoming State Office regarding Revised Draft Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project Sublette County, Wyoming (CEQ1/20070542), February 14, 2008: http://www.epa.gov/reglon8/compllance/nepa/nepadocs/FlnaIEPACommentsOnPlnedaleAnticline14Feb08.pdf 4 International Petroleum Industry Environmental Conservation Association and the International Association of Oil and Gas Producers, A Guide to Health Impact Assessments in the Oil and Gas Industry, (London 2005): http://www.lpieca.org/aetlvities/health/health publications.php 5 See The Northeast National Petroleum Reserve-Alaska Draft Supplemental Integrated Activity Plan Environmental Impact Statement, available at : http://www.blm.gov/aklst/en/prog/plannlng/nprageneral/nenpra/nenprafeis.html 6 42 USC § 4331 7 40 CFR 1508.27(b)2 Two recent papers authored by environmental health experts at the University of Colorado's School of Public Health recently examined available information regarding the health effects of oil and gas drilling and production. Among their findings is that: "Most of the hazardous chemicals associated with oil and gas production are well documented to produce adverse health effects in individuals." 9 They also looked at information specific to Garfield County, Colorado, which can serve as a model to other western Colorado counties. 10 Some of their conclusions that are specifically relevant to the upcoming RMP revisions include: • Air and water quality studies conducted to date indicate that potential exposures to hazardous emissions exist. • Many air toxics are essentially unmeasured in Garfield County and current plans for further air sampling may not be comprehensive enough to enable public health officials to determine the community health impact of oil and gas development. • Preliminary testing results indicate that ozone levels in some places are exceeding National Ambient Air Quality Standards and may be hazardous to humans. • There are no plans for comprehensive and systematic monitoring of surface and subsurface waters. • Environmental monitoring must be relevant to the areas where oil and gas development activity is

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	occurring and the results must be readily available to the public. Unbiased interpretation of the results must occur in a timely manner and be made available to the public. • It is important not to ignore what is already known. There is an immediate need for specific information on exposures and the impact from oil and gas development on all aspects of human health. • An adequate monitoring program should be developed through a rigorous scientific process that addresses all currently recognized data gaps and health risks. This process should be developed in a transparent and explicitly unbiased way. • A Health Impact Assessment (HIA) is a practical tool to evaluate future impacts, alternatives and appropriate strategies to promote and protect human health. Recommendation: BLM should incorporate a Health Impact Assessment (HIA) into the Draft RMP for the Uncompahgre RMP. 8 40 CFR 1500.2(f) 9 Witter, R. et al, " Potential Exposure-Related Human Health Effects of Oil and Gas Development: A Literature Review (2003-2008)/ August 1, 2008, hea 08091702b.pdf. 10 Witter, R. et al, "Potential Exposure-Related Human Health Effects of Oil and Gas Development: A White Paper," September 15, 2008, hea 08091702a.pdf.
431	The general problems are the dumping of household trash in these areas, (which has slowed down but there is little or no removal) and lack of trail maintenance/erosion control. It is my opinion that if directed by the BLM, local organizations such as our own or others, could garner and manage plenty of volunteer labor to clean trash and maintain trails and control erosion. I think this might also inspire more local pride in these areas.
467	Many of the lands within the Plan Area were County dumps and have not been properly cleaned up and rehabilitated. I would like to see these areas get addressed. Some people continue to dump trash, animal carcasses etc. on these lands that I would like to address through the revision process.
693	Health effects from oil and gas are serious - ozone and other airborne substances - since wholesale development of oil and gas my allergies are getting worse and friends who never had allergies now have them. My eyes are often irritated.
773	There are more than a few areas that locals have used over the years as their personal dumping ground on public lands. Some effort should be made to identify and clean them up.
785	Educate locals that dumping their trash on public lands is not a good thing and that there are cheaper and environmentally better options.
1250	The revised RMP must recognize the need for safe passage of equipment and personnel performing routine maintenance and repair -and especially the immediate passage of equipment and personnel responding to emergency electric outages-along the length of the existing electrical system located on public lands. Maintaining access rights to all electrical infrastructure within the planning area is critical.
1831	The first is a small parcel of land on the east side of Highway 550 and north of Cutler Creek. This area has some geologic interest as it contains a large rare rock dike and is an interesting area for a short hike. It has a road that can connect to adjoining forest lands. This area could be of interest to hikers but it has become a de-facto dump and currently has trash (old furniture, tvs, appliances etc) scattered.
2055	The BLM must also ensure that a viable long-term plan for dealing with any radioactive or contaminated materials as well as any other waste products is securely in place. The BLM must follow up with a regular inspection and monitoring program to ensure that violations are not occurring or not allowed to occur over a long period of time.
2400	I recently watched a TV documentary on the "fracking" method of extracting gas and oil in Colorado and other states that is highly hazardous to the health of residents due to the resulting water supply contamination. The devaluation of homes and property in the affected areas was devastating, but the worst ramification was the severe, chronic and irreversible health issues suffered by humans and animals. PLEASE do not allow unrestricted mining!