



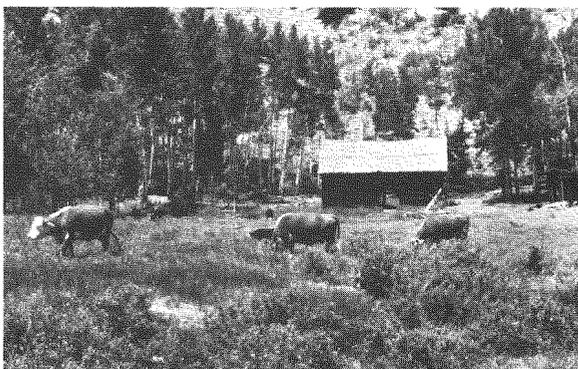
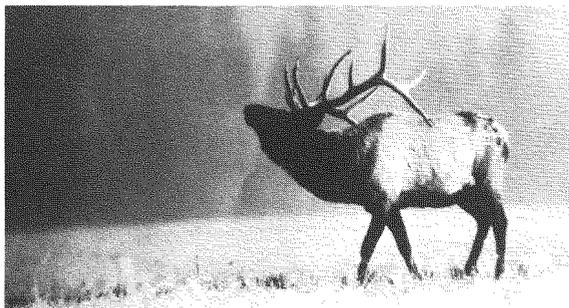
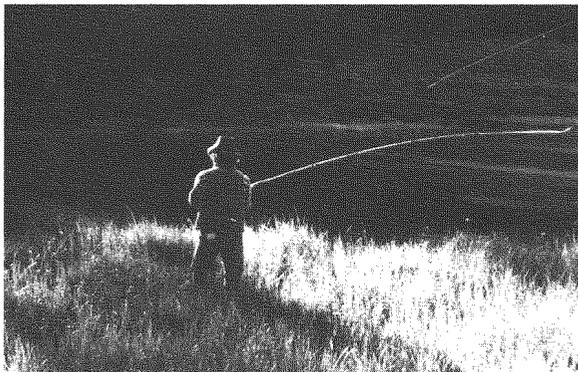
**United States Department of the Interior
Bureau of Land Management**

Montrose District
Colorado

April 1992



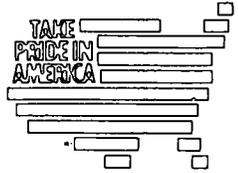
GUNNISON RESOURCE AREA
**Proposed Resource Management Plan
and Final Environmental Impact Statement**





United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Montrose District Office
2465 South Townsend
Montrose, Colorado 81401



IN REPLY REFER TO:

April, 1992

Dear Reader:

Enclosed for your review is the Gunnison Resource Area's Proposed Resource Management Plan and Final Environmental Impact Statement (PRMP). The PRMP is a refinement of the Preferred Alternative and accompanying environmental consequences in the Draft Gunnison Resource Management Plan and Environmental Impact Statement (DRMP), with consideration given to public comments, corrections, and rewording for clarification. Included as Appendix I is the Wild and Scenic River Study Analysis For The Lake Fork of The Gunnison River and Other Streams in The Planning Area. This retitled Appendix is an update of Appendix I of the DRMP. The PRMP is published in an abbreviated form and is designed to be used in conjunction with the DRMP that was published in March, 1991.

At the end of the 30-day protest period, and after the Governor's consistency review, the PRMP, excluding any portion under protest, shall become final. Approval shall be withheld on any portion of the PRMP under protest until final action has been completed on such protest. The Record of Decision and the Approved Resource Management Plan will then be prepared.

We appreciate the time and effort you have given during your involvement in this process. Your continued participation is essential to achieve wise management of public lands and resources.

Sincerely,

Alan L. Kesterke
District Manager

**GUNNISON
PROPOSED RESOURCE MANAGEMENT PLAN
AND
FINAL ENVIRONMENTAL IMPACT STATEMENT
APRIL, 1992**

Prepared by:
United States Department of the Interior
Bureau of Land Management
Colorado State Office
Montrose District
Gunnison Resource Area



District Manager, Montrose



Associate State Director, Colorado

**GUNNISON
PROPOSED RESOURCE MANAGEMENT PLAN
AND
FINAL ENVIRONMENTAL IMPACT STATEMENT**

Draft () Final (X)

Lead Agency: The United States Department of the Interior, Bureau of Land Management.

Type of Action: Administrative (X) Legislative ()

Abstract: This is the Proposed Resource Management Plan and Final Environmental Impact Statement for the Gunnison Planning Area of the Gunnison Resource Area. Included as Appendix I is the retitled Wild and Scenic River Study Analysis For The Lake Fork of The Gunnison River and Other Streams in The Planning Area.

This document responds to public comments on the Draft Gunnison Resource Management Plan and Environmental Impact Statement (DRMP), and the Wild and Scenic River Study Report for the lake Fork of The Gunnison River (Included as Appendix I of the DRMP). This document corrects errors found in the DRMP and, based on public comments and internal BLM review, adopts a refined and modified version of the Preferred Alternative, and accompanying environmental consequences, that was presented in the DRMP. The modified Preferred Alternative is the Bureau of Land management's Proposed Resource Management Plan.

This document incorporates by reference the DRMP which was released in March, 1991; the DRMP must be used in conjunction with this document.

For further information on this PRMP, contact Bill Bottomly, RMP Team Leader, Bureau of Land Management, 2505 South Townsend Avenue, Montrose, Colorado 81401; telephone commercial (303)249-6047 or FTS 322-7327.

Protests to this PRMP must be received within 30 days of the date of the publication of the Notice of Availability by the U. S. Environmental Protection Agency in the Federal Register.

PROTEST PROCEDURES

The resource management planning process includes an opportunity for administrative review via a plan protest to the BLM Director if you believe the approval of the Proposed Resource Management Plan and Final Environmental Impact Statement (PRMP) would be in error. (See 43 CFR 1610.5-2) Careful adherence to these guidelines will assist in preparing a protest that will assure the greatest consideration to your point of view.

Only those persons or organizations who participated in our planning process leading to this PRMP may protest. If our records do not indicate that you had any involvement in any stage in the preparation of the PRMP, your protest will be dismissed without any further review.

A protesting party may raise only those issues which he or she submitted for the record during the planning process. New issues raised in the protest period should be directed to the Montrose District or Gunnison Area Manager for consideration in plan implementation, as a potential plan amendment, or as otherwise appropriate.

The period for filing a plan protest begins when the Environmental Protection Agency publishes in the *Federal Register* its Notice of Availability of the Final environmental impact statement containing the PRMP. The protest period extends for 30 days. There is no provision for any extension of time. To be considered "timely", your protest must be postmarked no later than the last day of the protest period. Also, although not a requirement, we suggest that you send your protest by certified mail, return receipt requested.

Protests must be in writing to:

Director (760)
Bureau of Land Management
1849 "C" Street, NW
Washington, D.C. 20240

In order to be considered complete, your protest must contain, at a minimum, the following information:

1. The name, mailing address, telephone number, and interest of the person filing the protest.
2. A statement of the issue or issues being protested.
3. A statement of the part or parts of the PRMP being protested. To the extent possible, this should be done by reference to specific pages, paragraphs, sections, tables, maps, etc., included in the document.
4. A copy of all documents addressing the issue or issues that you submitted during the planning process, or a reference to the date the issue or issues were discussed by you for the record.
5. A concise statement explaining why the Colorado BLM State Director's proposed decision is believed to be incorrect. *This is a critical part of your protest.* Take care to document all relevant facts. As much as possible, reference or cite the planning documents, environmental analysis documents, or available planning records (i.e., meeting minutes or summaries, correspondence, etc.). A protest which merely expresses disagreement with the Colorado BLM State Director's proposed decision, without any data, will not provide us with the benefit of your information and insight. In this case, the Director's review will be based on the existing analysis and supporting data.

At the end of the 30-day protest period and after the Governor's consistency review, the PRMP, excluding any portions under protest, will become final. Approval will be withheld on any portion of the PRMP under protest until final action has been completed on such protest.

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Map Of The Proposed Resource Management Plan Inserted In Document

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MAP LIST

Proposed Resource Management Plan

CHAPTER ONE

SUMMARY OF THE PROPOSED RESOURCE MANAGEMENT PLAN

CHAPTER ONE

SUMMARY OF THE PROPOSED RESOURCE MANAGEMENT PLAN

This Gunnison Proposed Resource Management Plan and Final Environmental Impact Statement (PRMP) identifies and describes the future management of the lands administered by the Bureau of Land Management (BLM) in the Gunnison Planning Area and Gunnison Resource Area, in west-central Colorado for the next 10-12 years. The planning area encompasses a total of approximately 960,730 acres in the BLM's Montrose District. The BLM has administrative responsibility for the land and resources on 585,012 surface acres and 726,918 acres of mineral estate within the planning area.

A summary of the description of the proposed plan, presented under resource or resource use headings, follows. Please refer to Chapter Four of this PRMP for the complete description of the PRMP. Table 1-1 in this chapter compares the management under the proposed plan and Alternatives A (Continuation of Current Management), B, C, D, and E (Preferred Alternative), as presented in the March, 1991, Draft Gunnison Resource Management Plan and Environmental Impact Statement (DRMP).

The PRMP is an abbreviated document, in that the entire DRMP is not reprinted in this document. The DRMP may have to be referred to during review of this document.

NARRATIVE SUMMARY

Air Quality. Existing air quality would be maintained. Activities and projects would comply with all air quality regulations.

Oil, Gas, and Geothermal Resources. Approximately 623,416 acres of federal oil, gas, and geothermal estate would be open to leasing with standard terms; about 26,205 acres would be open to leasing with yearlong, no surface occupancy stipulations; about 13,166 acres would be open to leasing with controlled surface use stipulations; and about 11,823 acres would be open to leasing with seasonal stipulations. About 46,007 acres in the Powderhorn Primitive Area SRMA would be closed to oil and gas exploration, development, and leasing.

Locatable Minerals. Approximately 672,891 acres of Federal mineral estate would be open to mineral entry and location. About 54,047 acres would be withdrawn from mineral entry and location, including lands within the Alpine Loop National Backcountry Byway, Red Bridge and The Gate campgrounds, Powderhorn Primitive Area Special Recreation Management Area (SRMA) and Cochetopa Canyon SRMA, the recommended Slumgullion Earthflow National Natural Landmark, the American Basin, and the Dillon Pinnacles Areas of Critical Environmental Concern (ACECs), isolated parcels along Cebolla Creek, plus BLM and other agencies' miscellaneous withdrawals.

Saleable Minerals. Disposal of mineral materials would be authorized on 505,900 acres of public land with federal mineral estate. Disposal on 173,221 of these acres would be subject to seasonal restrictions. Disposal on lands within other agency withdrawals would require approval of these agencies. Disposal would not be authorized on 61,855 acres.

Soil and Water Resources. Soil and water resources would continue to be monitored to define problem areas, and to determine effectiveness of solutions. Measures to reduce erosion and increase plant basal cover on soils with moderate to severe erosion potential would be designed and incorporated into vegetation or land treatment plans. Best management practices, and other measures designed to reduce soil erosion and water quality deterioration would be required in all plans involving surface disturbance. Water rights would be applied for where appropriate. All actions under the proposed plan would comply with federal and state water quality standards and regulations. New water source developments would consider riparian values, and existing water source developments would be maintained, improved, or reclaimed.

Implementation and intensive management of Long Gulch Sediment Control and Riparian Habitat Improvement Plan, and other such plans, would continue. About 320 acres in the Wildcat Creek drainage would continue to be managed to maintain

CHAPTER ONE

the quality of Crested Butte's water supply. Soil erosion and watershed improvement projects would be permitted on 28,215 acres in the recommended West Antelope Creek ACEC if compatible with management of crucial big game winter range, and within the recommended 4,565 acre South Beaver Creek ACEC if compatible with protection and management of skiff milkvetch (*Astragalus microcymbus*), or management of other special status species.

Vegetation. Vegetation would generally be managed to achieve at least a late seral ecological status. Specific, desired plant communities would be identified in activity plans, as would any exceptions for managing vegetation to achieve other than a late ecological status. In riparian areas, vegetative management objectives would be aimed at maintaining, restoring, or improving the diversity, vigor, and quality of herbaceous and woody plants necessary for, (1) the hydrologic functioning of riparian systems, (2) the control of accelerated soil erosion and (3) sustained high quality livestock forage and wildlife habitat.

Riparian Zones. Existing riparian demonstration areas and improvements would continue to be managed and maintained. Riparian areas would be inventoried and prioritized where necessary to determine site-specific management strategies. Strategies, projects, or improvements would be included in activity plans, such as Coordinated Resource Management Activity Plans (CRMAs) and would be implemented first in high priority areas. Measures designed to minimize site-specific riparian deterioration would be required in all plans for surface-disturbing activities. Special road construction standards and protective measures would apply in riparian areas, in order to retain and protect as much riparian vegetation, soils, and water as possible. No commercial timber harvesting, logging decks, or staging areas would occur in riparian areas or within an adjacent 30-foot area either side of riparian zones, unless wildlife or riparian values would be improved. Existing water source developments or roads that occur within riparian areas would be relocated, redesigned, or modified if study shows that the hydrologic condition or riparian system is being negatively impacted. New water sources would be

developed with concern for the protection of riparian areas.

About 56 miles (1,000 acres) of riparian areas in Management Units 11 and 14 would be managed to improve and maintain vegetation to help optimize sage grouse populations. About 99 miles (1,800 acres) of riparian zones in Management Unit 12, crucial big game winter range, would be managed to increase production and diversity of vegetation to help support wintering big game. A Habitat Management Plan (HMP) would be prepared for Management Unit 12, and would include riparian zone management strategies. Riparian improvement projects would be permitted along 58 miles of riparian areas containing fisheries or potential fisheries in Management Unit 15, if compatible with fishery management.

Special Status Plant and Animal Species and Habitat. Habitat supporting existing populations of threatened and endangered species (T & E spp.) would be maintained and protected to insure suitable habitat conditions and viable populations. Monitoring and inventories would continue to be conducted to provide information for future management. Measures to protect T & E spp. and their existing or potential habitat would be required for surface-disturbing activities, including mining, drilling, facility construction, mineral material disposal, and similar activities. Pre-disturbance clearances and consultations with the United States Fish and Wildlife Service (USF & WS) would continue to be conducted. Supplemental releases or the reintroduction of T & E spp. could be authorized.

Redcloud Peak and South Beaver Creek Areas of Critical Environmental Concern (ACECs), Management units 5 and 8 respectively, totalling 10,512 acres in size, would be designated and managed to protect and enhance skiff milkvetch and Uncompahgre fritillary butterfly populations and habitat.

Wildlife Habitat Management. The HMP for the Planning Area would be revised and implemented in accordance with BLM's Fish and Wildlife Plan for Colorado-Program for the Future. Public lands would be managed for the mutual benefit of wildlife,

SUMMARY OF THE PRMP

include, but would not be limited to, methods to manage public lands to help meet CDOW long range herd goals, within carrying capacities of the habitat, and maintain or improve vegetation communities to benefit both game and non-game wildlife. New or additional forage made available as a result of wildlife management projects or treatments would be used first to satisfy watershed objectives, as defined in the Montrose District Soil Erosion Monitoring Guidelines. See Appendix N for more detail regarding meeting watershed objectives. Any excess available forage would then be used to meet objectives of individual wildlife projects.

The BLM would continue to participate in the Colorado Habitat Partnership Program, aimed at helping eliminate or mitigate conflicts between livestock and wildlife forage utilization.

Terrestrial Wildlife and Habitat

Elk and Deer habitat: Measures to increase important deer and elk winter shrub species on uplands and riparian areas on public lands within crucial deer and elk winter ranges would be determined and implemented to help achieve, within carrying capacities of the habitat, Colorado Division of Wildlife (CDOW) long-range herd goals of 9,000 elk and 16,600 deer. Crucial winter ranges and commercial forest lands would continue to be inventoried and monitored to gather information pertinent for big game management. Public lands would be inventoried to identify elk calving areas. Temporary reductions in big game numbers would be recommended if necessary in order to achieve proper use levels and better forage conditions on habitat receiving heavy utilization by wildlife. Temporary reductions in CDOW's long-range herd goals would be recommended in certain Game Management Units (GMUs) until the vigor and production of important habitat species increases such that long-range goals could be supported. Permanent reductions in elk and deer numbers in GMU 64 south and east of Cimarron, in Management Unit 12, would be recommended and implemented in order to reduce resource conflicts. West Antelope ACEC, Management Unit 7, totalling 28,215 acres, would

be designated and managed to improve habitat for wintering elk, deer, and bighorn sheep. A HMP would be prepared for 76,192 acres of crucial deer and elk winter range in Management Unit 12.

Pronghorn Antelope and Bighorn Sheep: Pronghorn antelope and bighorn sheep habitat would be managed for 500 animals of each species. Inventories would be completed to identify bighorn sheep lambing areas and suitable winter ranges, and suitable areas in which to establish new populations of bighorn sheep and pronghorn antelope. Supplemental releases and reintroductions could be authorized. Monitoring studies would be established within pronghorn antelope ranges. Management Unit 10 would be managed to minimize disturbance to bighorn sheep and potential lambing areas along Cebolla and Cochetopa Creeks, and a HMP would be prepared for these lands.

Sage Grouse and Other Upland Game Bird Habitat: Sagebrush and riparian vegetation on public lands would be managed to support approximately 9,000 sage grouse. Identified sage grouse habitat, including nesting, brood-rearing, and wintering areas, would be maintained or improved. Sage grouse strutting grounds, or leks, would be protected by seasonally restricting or excluding surface-disturbing activities.

The introduction of Merriam's turkey and Columbian sharp tailed grouse would be considered for lands with suitable habitat.

Non-game Wildlife Habitat: Non-game species habitat would be enhanced by improving or maintaining a variety of vegetation communities, and management within commercial forest lands. Raptor nesting inventories and monitoring would be conducted or updated to identify nesting areas and establish population trends. Disturbance to or near raptor nest sites would be excluded or restricted, depending on the species.

Other Terrestrial Wildlife: The introduction of moose would be considered within the Powderhorn Primitive Area Special Recreation Area (SRMA), Management Unit 2, if Congress does not designate the unit as a wilderness area.

CHAPTER ONE

Fishery Resources (Aquatic Habitat)

Fishery streams and associated riparian areas would be managed to improve their overall condition in order to enhance fisheries. Streams and aquatic habitat would be inventoried and monitored to determine site-specific management strategies that would be implemented as activity plans are carried out. The BLM and Forest Service Recreational Fisheries Policy, 1990, would be implemented. Measures designed to prevent fishery stream or riparian zone deterioration would be required in all plans for surface-disturbing activities.

Instream water flow appropriations would be pursued on 113 miles of fishery streams in order to ensure a sufficient amount of water for fisheries maintenance and protection. About 57 miles of streams in Management Unit 15 would be intensively managed to improve fishery conditions.

Livestock grazing would be temporarily eliminated along North Willow Creek in grazing Allotment 6202 (in the West Antelope Creek ACEC, Management Unit 7), and within 1/4 mile of Los Pinos Creek in unit 13 in order to allow riparian conditions to recover. Fishery improvement projects would be permitted in the Powderhorn Primitive Area SRMA, Management Unit 2, if compatible with the objectives of the unit.

Livestock Grazing Management. About 470,460 acres of public land suitable for grazing would be available for grazing in existing allotments, with about 46,904 Animal Unit Months (AUMs) being available for allocation. Public lands unsuitable or unavailable for livestock grazing would continue to be excluded from livestock grazing unless monitoring or other sources of data indicate that the areas may be used for grazing. Public lands suitable for grazing is defined in this document as those lands that contain those physical features that are conducive to domestic livestock grazing, regardless of whether grazing is currently permitted. Lands unsuitable for domestic livestock grazing do not possess these features. About 64,192 acres have been identified in the Planning Area that are not suitable for grazing. Livestock use would be restricted, either seasonally or otherwise, on approximately 201,644 acres

of public land. Allotment categorization would be re-examined as needed based upon a change in categorization factors identified from monitoring data or other management and resource information. Allotment categorization and management levels in the 1987 Rangeland Program Summary update would continue for all "M" and "C" allotments, unless monitoring data or other management or resource information indicate adjustments are necessary. On category "I" allotments, existing management and/or forage allocation levels would be adjusted if necessary to achieve or maintain a desired plant community and to meet the following resource needs:

1) a forage utilization level in uplands would be maintained during the grazing period of use that would allow for plant health or maintenance, watershed cover needs, and that would provide quality forage and wildlife cover. Within allotments not covered by activity plans or grazing agreements that prescribe grazing strategies designed to meet these needs, the maximum use level in uplands during the grazing period of use would be 40-60% of the current year's production by weight on key forage species.

2) forage utilization levels in riparian zones, except those in units 14 and 15, would not exceed 40% to 60% of key herbaceous forage species, with a 2-1/2 inch minimum stubble height that would be maintained throughout the grazing period of use.

3) a minimum stubble height of 4" within all riparian zones in Management Unit 14 would be maintained from June 15 through July 31, and a minimum stubble of 2 1/2" would be required at all other times.

4) a minimum stubble height of 4" in all riparian zones in Management Unit 15, and some in unit 2, would be maintained during the grazing period of use.

Livestock grazing in some Management Units would be further modified to resolve resource conflicts, and

SUMMARY OF THE PRMP

additional modifications could occur if studies indicate changes are necessary, particularly in riparian areas. Refer to Management Unit prescriptions and the Livestock Grazing section of Standard Management, Chapter Four, for details on livestock grazing and exceptions or flexibility to these measures.

Throughout the Planning Area, range readiness criteria in Table B-1, Appendix B, would be considered when earlier-than-permitted turnout dates are requested, and would be implemented and incorporated according to Livestock Grazing Standard Management.

Additional forage made available for livestock would be allocated in accordance with 43CFR 4100, with consideration given to meeting basic soil and watershed needs as defined in the Montrose District Soil Erosion Monitoring Guidelines. See Livestock Grazing Management, Page 4-9 in Chapter Four, and Appendix N for more detail. Any additional forage available for livestock would be considered in reactivating suspended use or as a means to avoid suspending active use.

Existing livestock facilities would be maintained, and new improvements would continue to be identified in activity plans or agreements. Range improvements identified in the Gunnison Basin MFP Record of Decision for grazing would not be incorporated into the PRMP. However, any range improvements identified in the MFP ROD that were not implemented, and would enhance or facilitate resource management objectives would be considered for development. The BLM's livestock improvement funds would be prioritized according to the Livestock Grazing section of Standard Management in Chapter Four. Vegetation or land treatments, and facility development would be restricted in some manner on about 201,644 acres of public land, and would be excluded on about 4,294 acres. Monitoring data collected would include, but would not be limited to, 1) actual use data, 2) utilization data, including forage consumption and stubble heights, and 3) trend data.

New or existing activity plans, such as AMPs or CRMAs, would be developed, modified, or revised, based on available staffing, using an interdisciplinary approach that would include input from permittees and other interested parties. A cooperative noxious

weed control program would be initiated with county governments.

Forest Management. About 41,347 acres of suitable commercial forest lands and 23,615 acres of suitable woodlands would be available for harvest, and a possible annual harvest of 1,200 MBF of commercial timber would be considered, depending on staffing capabilities, management priorities, and other factors. Approximately 490 cords of fuelwood, 400 wildings, and, on average, 300 Christmas trees would also be available for harvest annually. Backlog reforestation would occur as funds become available. One Forest Management Plan (FMP) would be prepared. Harvest restrictions, including total exclusions, design requirements, or seasonal restrictions would apply or would be considered in riparian areas, existing Wilderness Study Areas (WSAs), Slumgullion Earthflow National Natural Landmark ACEC, areas exhibiting erodible soils, crucial big game winter range, elk calving areas, within SRMAs, on areas where slopes exceed 35 percent, or for non-game wildlife habitat and recreation management.

Recreation Management. Public lands in the Planning Area would be managed according to BLM's *Recreation 2,000: A Strategic Plan*. Management would focus on resource protection, visitor services and information, and recreation facility construction, operation, and maintenance in order to provide a variety of recreation opportunities and experiences. Cooperative partnerships with agencies, the private sector, and volunteers would be expanded and strengthened to enhance local and regional recreation opportunities and tourism.

Cochetopa Canyon SRMA: Cochetopa Canyon SRMA, Management Unit 3, would be managed according to the existing activity plan. The BLM would continue to manage resources in the unit to provide and improve the existing diversity of recreation opportunities, emphasizing fishing and overnight camping in a Roaded Natural Recreation Opportunity Spectrum (ROS) setting.

Alpine Triangle SRMA: Alpine Triangle SRMA, composed of several Management Units, would be managed for a variety of ROS settings and opportunities, including historical, scenic, and natural values, hiking, sightseeing, motorized recreation, camping, winter recreation, hunting, fishing, and floatboating. A joint BLM and United States Forest

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Service (FS) visitor center in Lake City would be pursued. A CRMAP would be prepared. Two campgrounds would be upgraded and fees charged, if feasible.

Powderhorn Primitive Area SRMA: Powderhorn Primitive Area SRMA, Management Unit 2, would be managed for enhancement of natural values and primitive recreation opportunities in Primitive and Semi-Primitive ROS settings. A Recreation Area Management Plan (RAMP) would be prepared. Commercial recreation permitting would continue, and use levels would be established if necessary. If necessary, use levels and a permit system for private recreation use would be implemented. The existing primitive area boundary would be adjusted to include all public lands in Management Unit 2. Acquisition of 40 acres of private land and all state-owned minerals would be pursued.

Throughout the Planning Area, cleanup and periodic patrols would be conducted, and commercial recreation permitting would continue on a case-by-case basis.

Gunnison Extensive Recreation Management Area: The remainder of the Planning Area would continue to be managed as the Gunnison Extensive Recreation Management Area (ERMA). Potential recreation projects at Hartman's Rocks, Slate River, and High Mesa would be considered. ROS settings would be determined. If proposed for development, these projects would be addressed in Recreation Project Plans.

The 1,595-acre American Basin recommended ACEC, Management Unit 4, and the 532-acre Dillon Pinnacles recommended ACEC, Management Unit 9, would be designated and managed for scenic and recreation values. The 1,407-acre Slumgullion Earthflow National Natural Landmark recommended ACEC, Management Unit 6, would be designated and managed for geological interpretation.

About 48,877 acres of public land, including Powderhorn Primitive Area SRMA, would be closed to off-highway vehicle use (OHV); OHV use on 74,428 acres would be limited seasonally, if necessary for wintering elk and deer; OHV use on 97,714 acres would be limited to designated routes

yearlong; and 363,993 acres would be open to OHV use.

Wild and Scenic River Study Segment. No portion of the Lake Fork of The Gunnison River, including the 13.3 mile long Study Segment A, which BLM determined to be eligible for inclusion into the National Wild and Scenic Rivers System (NWSRS), would be recommended as being suitable for designation and inclusion into the NWSRS. Values and resources within Study Segment A would be managed according to the prescriptions for Management Units 1, 4, and 15 and STANDARD MANAGEMENT in Chapter Four of this PRMP. Please refer to Appendix I for the wild and scenic river analysis of streams in the Planning Area.

Visual Resource Management. Public lands would be managed according to the objectives for the following Visual Resource Management (VRM) Classes: VRM Class I: 49,872 acres; VRM Class II: 169,614 acres; VRM Class III: 135,738 acres; VRM Class IV: 225,776 acres. Rehabilitation would be considered on 4,812 acres classified as VRM Classes IIR, IIIR, and IVR. The 1,595-acre American Basin recommended ACEC and the 532-acre Dillon Pinnacles recommended ACEC, Management Units 4 and 9 respectively, would be designated and managed for scenic and recreation values. Federal mineral estate in these recommended ACECs would be withdrawn from mineral entry and location. Any public lands in the Planning Area designated as wilderness by Congress would be also designated and managed according to VRM Class I objectives.

Wilderness Study Areas. The six Wilderness Study Areas (WSAs) in the Planning Area, totalling about 114,247 acres, would be managed according to BLM's Interim Management Policy and Guidelines for Lands Under Wilderness Review (IMP) until Congress decides on their designation or non-designation into the wilderness system. Any areas acted upon by Congress and not designated into the system would be managed according to Standard Management and the Management Unit prescriptions in which they occur in this PRMP. Until Congress acts, actions in WSAs would be limited to those that could occur under BLM's IMP. Areas designated as wilderness would be managed as such, and a management plan would be written for those areas.

SUMMARY OF THE PRMP

Archaeological and Historical Resources (Cultural Resources). Cultural resources would be managed according to existing legislation and policies. Measures would be included in all plans involving surface disturbance to mitigate, protect, interpret, or otherwise enhance significant cultural resources. Class I and III inventories, and clearances, would be conducted prior to disturbances. Inventories to discover historic sites on public lands would continue, and inventories would also be conducted to determine archaeological site density, diversity, and distribution in order to build a data base for management of archaeological resources. Cultural resources identified or discovered would be evaluated according to BLM's Cultural Resource Use Categories and/or considered for mitigation. Stabilization would continue on significant historical sites or to eliminate public safety hazards. Cooperative management of historic sites with the National Park Service in the Alpine Triangle SRMA would continue.

Paleontological Resources. Prior to any surface-disturbing activity occurring in areas containing potential for the occurrence of paleontological values, inventories would be completed, and protective measures would be taken for known or discovered fossil values.

Transportation and access. The existing 333 miles of roads, 110 miles of trails, and 32 easements would continue to be provided and maintained as funds are available. New access to public lands would be pursued into eleven (11) areas. The transportation plan map would be updated.

Disposal of Public Lands. A total of 43 tracts of public land containing about 3,120 acres would be classified as Category I lands and would be identified as being available for disposal by public sale under criteria in Section 203 of the *Federal Land Policy and Management Act (FLPMA)* of 1976. The remainder of the public lands in the Planning Area would be classified as Category II lands that would be managed for multiple use purposes. These Category II lands would not be available for public sale, but, on a case-by-case basis, could be disposed of through exchange, boundary adjustments, state indemnity selections, Recreation and Public Purpose Act (R&PP) applications or other appropriate authority, if disposal complies with legislation and policy, and serves the public interest. All disposal

would comply with the requirements of the *National Environmental Policy Act (NEPA)* of 1969. A land disposal activity plan would be prepared. Disposal of public lands with T&E plants would occur only if the viability of overall populations would not be jeopardized.

Acquisition of Non-Federal Lands. Non-federal lands surrounded by or adjacent to Category II lands or lands unavailable for disposal would be considered for acquisition on a case-by-case, willing seller-willing buyer basis. Acquisition would be contingent on potential proposals meeting NEPA requirements and one or more of the criteria for acquisition as established for this PRMP. If available, acquisition of the following non-federal lands would be pursued: 40 private acres, and all state-owned mineral estate within the Powderhorn Primitive Area SRMA, Management Unit 2; private lands within the Alpine Triangle SRMA, Management Unit 1; 40 private acres in American Basin ACEC, Management Unit 4; private lands in South Beaver Creek ACEC, Management Unit 8; and 270 private acres in Dillon Pinnacles ACEC, Management Unit 9.

Rights-of Way. About 448,219 acres of public land would be open to the location of rights-of-way, on a case-by-case basis, and seasonal construction restrictions would apply to 155,870 of these acres. About 85,387 acres and 51,406 acres would be designated rights-of-way avoidance and rights-of-way exclusion areas, respectively.

Rights-of-Way Corridors. A right-of-way (ROW) corridor one-mile wide would be designated along the existing Western Area Power Association (WAPA) 230 Kv Curecanti to Salida electrical transmission line in Management Units 8, 11, 12, 13, and 17. A ROW window 1,000 feet in width (500 feet either side of the centerline) would be designated where the existing WAPA line crosses Management Unit 8. A similar one-mile wide ROW corridor would be designated along the Colorado Ute Electric Association's existing 230 Kv Blue Mesa to Lake City line across Management Units 1, 13, and 16.

Fire Management. Wildfires on about 508,388 acres of public lands would be suppressed according to a conditional suppression policy and according to a full suppression policy on about 76,624 acres. Within conditional suppression areas some wildfires,

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such as those on public lands adjacent to private lands or in recreation areas, would be fully suppressed to protect valuable resources, investments, facilities, and property, life, and safety on non-federal and federal lands. Prescribed fires for resource enhancement or fuel hazard reduction could occur throughout the Planning Area in accordance with approved prescribed burn plans. A site-specific burn plan and Environmental Analysis (EA) would be prepared prior to authorizing any prescribed burns.

Withdrawals and Classifications. Public lands currently under withdrawal would continue to be withdrawn, unless modified in a management unit prescription. Periodic review of existing withdrawals would be conducted to determine the need for each. About 54,047 acres would be withdrawn from mineral entry and location through BLM protective withdrawals within the following areas: Alpine Loop National Backcountry Byway; Red Bridge and The Gate campgrounds; Powderhorn Primitive Area and Cochetopa Canyon SRMAs, Management Units 2 and 3 respectively; the American Basin, the Slumgullion Earthflow National Natural Landmark, and the Dillon Pinnacles ACECs, Management Units 4, 6, and 9 respectively; and isolated parcels along Cebolla Creek.

Other agencies' miscellaneous withdrawals would continue until relinquished. If relinquished, and if the lands are determined to be suitable for BLM management, these withdrawals would be revoked. If opened for BLM management, these lands would be managed according to this PRMP.

Waterpower and Storage Reservoir Sites. Lands withdrawn for these purposes would be managed for potential water power and storage purposes. Before uses occur or facilities are developed that could be jeopardized by water power or storage reservoir projects on public lands withdrawn for those purposes, the Federal Energy Regulatory Commission (FERC) would be consulted regarding withdrawal status and the need for the withdrawal. Inventoried and potential sites would be managed for future water power purposes unless higher priority resource uses would be implemented. Management Units 1, 3, 10, 14, and 15 would be recommended to be closed to the development of water power or storage reservoir projects.

Areas of Critical Environmental Concern. Six separate areas on public land, totalling about 42,261 acres in Management Units 4 through 9 respectively, would be designated as the American Basin, Redcloud Peak, Slumgullion Earthflow National Natural Landmark, West Antelope Creek, South Beaver Creek, and Dillon Pinnacles ACECs. These ACECs would be managed according to their respective prescriptions. A management plan would be prepared for each ACEC, or their management direction would be included in an activity plan for a larger, adjacent area.

Hazards Management. Hazard sites or areas would be reviewed on a case-by-case basis and remedied to the degree necessary to protect public safety and health. Activity plans would consider the remediation of known hazards. Coordination and cooperation with appropriate state or other agencies to remedy hazard sites would continue.

Hazardous Materials Management. Locations on public lands showing evidence of hazardous materials would be inventoried and examined on a case-by-case basis, and remedied to the degree necessary to protect public health, safety, and public or private property. Coordination and cooperation with appropriate state or other agencies to properly manage hazardous materials would continue. Activity plans would consider the remediation of known hazards.

Trespass dumping and littering on public lands would be controlled through public awareness, signing, and monitoring.

Law Enforcement. Bureau patrols and law enforcement activities would be conducted on a priority basis. Information dissemination and education would be carried out by BLM rangers during regularly scheduled patrols or public contacts.

COMPARISON TABLE OF THE PRMP AND ALL ALTERNATIVES

Table 1-1 compares the key points for each resource or resource use within each alternative in the DRMP and the PRMP. If management of a resource in the PRMP is identical to that in the Preferred or another Alternative, that management would be simply referenced.

Table 1-1

SUMMARIZED COMPARISON OF THE PROPOSED PLAN AND THE MANAGEMENT ALTERNATIVES

RE-SOURCE/ RE-SOURCE USE	MANAGEMENT UNDER EACH ALTERNATIVE					
	ALTERNATIVE A (Continuation of Current Management)	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D	ALTERNATIVE E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
	OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.	OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.	OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, or protecting, or enhancing the natural environment at a compatible and non-restricting level.	OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.
LOCAT- ABLE MINERALS	Allow mineral entry and location on 683,285 acres; currently 45,282 acres are withdrawn from mineral entry and location.	670,198 acres would be open to mineral entry and location; 58,369 acres would be withdrawn from entry and location (includes Powderhorn SRMA, Slumgullion Slide, American Basin drainage, Alpine Loop National Backcountry Byway, Red Bridge Campground, Gate recreation area, Cochetopa SRMA, Cebolla Creek isolated withdrawal, and miscellaneous other agency withdrawals).	Allow mineral entry and location on the entire federal mineral estate, 728,567 acres. Recommend revocation of all withdrawals that segregate lands from mineral entry and location on public land, and no new withdrawals would be approved.	Allow mineral entry and location on 649,645 acres; 78,922 acres would be withdrawn from entry and location (includes S. Beaver Creek and Redcloud Peak RNA/ACECs and Haystack Cave, Cebolla Creek, Slumgullion Slide, American Basin, Lake Fork, and Dillon Canyon SRMAs, Slumgullion Pinnacles ACECs, units D-13, D-19, D-22 (262 acres), plus miscellaneous existing withdrawals).	Allow mineral entry and location on 674,540 acres; 54,027 acres would be withdrawn from entry and location. Includes Alpine Loop National Backcountry Byway, Red Bridge and The Gate campgrounds, Powderhorn Primitive Area and Cochetopa Canyon SRMAs, Slumgullion Earthflow National Natural Landmark, American Basin, and Dillon Pinnacles ACECs, Cebolla Creek, plus BLM and other agencies' miscellaneous existing withdrawals.	Same as Alternative E, except that an additional 20 acres would be withdrawn from entry and location at Mill Creek Campground, resulting in a total of 54,047 acres to be withdrawn.
OIL, GAS, AND GEO- THERMAL RE- SOURCES	Open to leasing: (a) 610,169 acres; (b) with a seasonal stipulation, 288,640 acres; (c) with standard terms, 321,529 acres. Closed to leasing, 110,007 acres (includes federal oil and gas estate in WSAs).	Open to leasing: (a) 672,639 acres; (b) with a no surface occupancy stipulation, 30,856 acres; (c) with seasonal stipulations, 177,311 acres; (d) with standard terms, 464,472 acres.	Allow leasing on 720,176 acres of federal oil, gas, and geothermal estate with standard terms.	Open to leasing: (a) 667,422 acres, (b) with a no surface occupancy stipulation, 114,430 acres; (c) with seasonal stipulations, 202,678 acres; (d) with standard terms, 350,314 acres.	Open to leasing: (a) 674,169 acres; (b) with a no surface occupancy stipulation, 35,605 acres; (c) with seasonal stipulations, 47,545 acres; (d) with controlled surface use stipulation, 2,417 acres;	Open to leasing: (a) 674,169 acres; (b) with a no surface occupancy stipulation, 26,205 acres; (c) with seasonal stipulations, 11,823 acres; (d) with controlled surface use stipulation, 13,166 acres;

CHAPTER ONE - COMPARISON TABLE, PRMP AND ALTERNATIVES

Table 1-1 (Cont'd)

SUMMARIZED COMPARISON OF THE PROPOSED PLAN AND THE MANAGEMENT ALTERNATIVES

MANAGEMENT UNDER EACH ALTERNATIVE

RE-SOURCE/ RE-SOURCE USE	ALTERNATIVE A (Continuation of Current Management)	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D	ALTERNATIVE E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
	OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.	OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.	OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, or protecting, or enhancing the natural environment at a compatible and non-restricting level.	OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.
OIL, GAS, AND GEO- THERMAL RE- SOURCES (Cont'd)		Closed to leasing: 47,537 acres (includes Powderhorn ACEC, American Basin drainage, Red Bridge campground).		Closed to leasing: 52,754 acres (includes Slumgullion Slide ACEC, Lake Fork ACEC, Dillon Pinnacles ACEC, and Powderhorn SRMA).	(e) with standard terms, 588,602 acres. Closed to leasing, 46,007 acres (includes the Powderhorn Area SRMA).	(e) with standard terms, 623,416 acres. Closed to leasing, 46,007 acres (includes the Powderhorn Primitive Area SRMA).
SALEABLE MINERALS	683,275 acres available for disposal; disposal on 45,282 acres currently withdrawn from mineral entry and location would require approval of withdrawing agency; disposal would also not be permitted on 10 acres withdrawn from mineral leasing.	Available for disposal with federal mineral estate: 670,065 acres; disposal on 179,063 of these acres would be subject to seasonal restrictions; disposal on lands withdrawn would require the approval of the withdrawing agency; disposal would not be permitted on 58,502 acres.	720,881 acres available for disposal; disposal on the remainder of federal mineral estate would not be permitted for a variety of reasons (7,686 acres).	Available for disposal with federal mineral estate: 579,309 acres; disposal on 199,054 of these acres would be subject to seasonal restrictions; disposal on lands withdrawn would require approval of withdrawing agency; disposal not permitted on 149,258 acres.	Available for disposal with federal mineral estate: 666,530 acres; disposal on 188,970 of these acres would be subject to seasonal restrictions; disposal on lands withdrawn would require approval of withdrawing agency; disposal not permitted on 62,037 acres.	Available for disposal with federal mineral estate: 665,712 acres; disposal on 172,087 of these acres would be subject to seasonal restrictions; disposal on lands withdrawn would require approval of withdrawing agency; disposal not permitted on 61,855 acres.
SOIL AND WATER RE- SOURCES	Continue implementation and intensive management of Long Gulch Sediment Control and Riparian Habitat Improvement Plan.	Continue implementation and intensive management of Long Gulch Sediment Control and Riparian Habitat Improvement Plan.	Continue implementation and intensive management of Long Gulch Sediment Control and Riparian Habitat Improvement Plan.	Continue implementation and intensive management of Long Gulch Sediment Control and Riparian Habitat Improvement Plan.	Continue implementation and intensive management of Long Gulch Sediment Control and Riparian Habitat Improvement Plan.	Same as Alternative E.

SOIL AND WATER RESOURCES (Cont'd)

Require mitigation to minimize accelerated soil erosion and water quality deterioration in all plans involving surface disturbance.	Measures for erosion reduction and increasing plant basal cover incorporated into vegetation treatments on soils with moderate to severe erosion potential.	Increased plant basal cover would be accomplished on soils with a moderate to severe erosion potential during vegetation treatment implementation to reduce erosion.	Erosion reduction and increasing plant basal cover incorporated into vegetation treatments on soil with moderate to severe erosion potential.	Measures for erosion reduction and increasing plant basal cover incorporated into vegetation treatments on soils with moderate to severe erosion potential.
Pursue, through state water court, water rights where necessary and identified in Montrose District water use assessment, including on 113 miles of fisheries.	Water rights applied for where appropriate, including along 113 miles of fishery streams.	Water rights would be applied for where appropriate.	Water rights applied for where appropriate, including along 113 miles of fishery streams.	Water rights applied for where appropriate, including along 113 miles of fishery streams.
Manage 320 acres in Wildcat Creek drainage to help protect Crested Butte's water supply.	Measures designed to reduce soil erosion and water quality deterioration required in all plans involving surface disturbance.	Manage 320 acres in Wildcat Creek drainage in unit C-2 to help protect Crested Butte's water supply.	Compatible measures designed to reduce soil erosion and water quality deterioration required in all plans involving surface disturbance.	Measures designed to reduce soil erosion and water quality deterioration required in all plans involving surface disturbance.
Maintain watershed improvement developments in good physical condition. Maintain roads as scheduled, with poorly located roads receiving first priority.	Manage 320 acres in Wildcat Creek drainage to help protect Crested Butte's water supply. Erosion control and watershed improvement projects on 4,625 acres would be developed if compatible with T&E species management; soil and water improvement projects would be developed on 29,060 acres of big game crucial winter range; measures to improve overall hydrologic conditions on 21,870 acres of sage grouse habitat in riparian areas would be implemented.	New available forage from wildlife treatments on 351,837 acres would be used for watershed protection in units C-4 through C-12. No public lands, other than those mentioned above, would be intensively managed for soil or watershed management.	Manage 320 acres in Wildcat Creek drainage to help protect Crested Butte's water supply. Water source developments would be maintained, improved, or reclaimed. Erosion control projects restricted to prevent accidental destruction in unit D-1 on 9,562 acres to prevent accidental destruction of T&E species.	Manage 320 acres in Wildcat Creek drainage to help protect Crested Butte's water supply. New water sources developed would consider riparian values. Existing developments would be maintained, improved, or reclaimed. Soils and watershed projects permitted on 28,215 acres in West Antelope ACEC if compatible with crucial big game winter range management.
				Erosion control and watershed improvement projects on 4,565 acres would be developed if compatible with T&E species management.

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RIPARIAN ZONES

Continue intensive management in Long Gulch riparian zone as per management plan.	Continue intensive management in Long Gulch riparian zone as per management plan.	Continue intensive management in Long Gulch riparian zone as per management plan.	Continue intensive management in Long Gulch riparian zone as per management plan.	Continue intensive management in Long Gulch riparian zone as per management plan.	Same as Alternative E, except management units would not be prefixed with the letter E.
Require measures to minimize deterioration in riparian areas for all plans involving surface disturbance.	Riparian improvement projects designed and required in high priority areas and would be included in other resource activity plans.	Modify existing water source developments in riparian zones if hydrologic condition is being impacted. Nonconflicting riparian projects incorporated into activity plans or CRMAPS and implemented in high priority riparian areas.	Riparian improvement projects designed and required in high priority areas and included in other resource activity plans.	Riparian improvement projects designed and required in high priority areas and included in other resource activity plans.	
Determine high priority riparian areas where improvement strategies and projects would be implemented.	New permanent roads excluded in North Willow Creek and Stevens Creek riparian zones.		Measures to minimize riparian/aquatic zone deterioration required in all plans involving surface disturbance.	Measures to minimize riparian/aquatic zone deterioration required in all plans involving surface disturbance.	

Table 1-1 (Cont'd)

SUMMARIZED COMPARISON OF THE PROPOSED PLAN AND THE MANAGEMENT ALTERNATIVES

MANAGEMENT UNDER EACH ALTERNATIVE						
RE-SOURCE/ RE-SOURCE USE	ALTERNATIVE A (Continuation of Current Management)	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D	ALTERNATIVE E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
	OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.	OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.	OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, or protecting, or enhancing the natural environment at a compatible and non-restricting level.	OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.
1-12 RIPARIAN ZONES (Cont'd)	Accomplish riparian management objectives in current Resource Area Habitat Management Plan at current rate.	Timber harvests excluded in all riparian areas. Existing water source developments modified, if riparian zones are being negatively impacted.	Riparian improvement projects permitted in unit C-9 (1,117 acres). Area-wide HMP revised to include riparian zone management from units C-9, C-10, C-11.	Timber harvests excluded in all riparian areas. Existing water sources in riparian areas modified or relocated if riparian zones are being negatively impacted.	Special road construction objectives adhered to. Timber harvests permitted in riparian areas if riparian and wildlife values improved.	Same as Alternative E, except management units would not be prefixed with the letter E.
		Projects implemented in some riparian areas on 21,870 acres of sage grouse riparian habitat for improved riparian vegetation. Improve overall riparian conditions on 14,933 acres of riparian areas, and in riparian areas in unit B-11. Rehabilitate riparian zones where ecological or hydrological condition is deteriorated	Improve overall riparian conditions on 1,839 acres in units C-9, C-10, and C-11 and rehabilitate zones in unit C-10 where hydrologic condition is below potential. Compatible projects designed to achieve abundant vegetative cover, an increase in diversity of herbaceous plants and in the proportion of native bunchgrasses for sage grouse on 5 miles in unit C-10 (602 acres)	Improve overall riparian conditions on 14,933 acres of riparian areas, including in riparian zones in unit D-14 (76,752 acres of sage grouse habitat) and D-22 (108,335 acres of "I" allotments). Compatible projects designed to achieve abundant vegetative cover, an increase in diversity of herbaceous plants and in the proportion of native bunchgrasses for sage grouse in high	Existing water sources and roads in riparian areas modified or relocated if riparian zones are being negatively impacted. Manage riparian zones in units E-11 (31 miles) and E-14 (25 miles) to improve and maintain vegetation to optimize sage grouse populations.	

RIPARIAN
ZONES
(Cont'd)

<p>and require measures to reduce deterioration of riparian ecosystems in surface disturbing plans on 7,298 acres of an sage grouse habitat.</p>	<p>are permitted; vegetation production and diversity would be increased for big game and other wildlife on 10 miles of riparian zones in unit C-9.</p>	<p>priority areas on 99 miles in unit D-12 (9,657 acres) would be permitted.</p>	<p>About 99 miles of riparian zones in 91,547 acres of big game crucial winter range in unit E-12 would be managed to increase production and diversity of vegetation to help support wintering big game; a HMP for E-12 would include riparian zone management.</p>
<p>Area wide HMP revised to include riparian zone management.</p>	<p>In unit C-11 (120 acres), compatible improvement strategies and projects would be permitted.</p>	<p>Vegetation production and diversity would be increased for big game and wildlife on 76 miles of crucial big game riparian zones in unit D-11 (12,462 acres).</p>	<p>Compatible riparian improvement projects permitted along 58 miles of riparian zones containing fisheries or potential fisheries in unit E-15. Revise area-wide HMP to include riparian zones management for unit E-15.</p>
		<p>Revise area-wide HMP to include riparian zone management.</p>	

SPECIAL
STATUS
PLANT
AND
ANIMAL
SPECIES
AND
HABITAT

<p>Requires measures to protect T&E species, individuals, and habitats in plans for all surface disturbing activities.</p>	<p>Require measures to protect T&E species, individuals, and habitats in plans for all surface disturbing activities.</p>	<p>Require measures to protect T&E species, individuals, and habitats in plans for all surface disturbing activities.</p>	<p>Require measures to protect T&E species, individuals, and habitats in plans for all surface disturbing activities.</p>	<p>Require measures to protect T&E species, individuals, and habitats in plans for all surface disturbing activities.</p>	<p>Same as Alternative E.</p>
<p>Continue to inventory and monitor T&E plant and animal habitats. Continue T&E clearances and Section 7 consultations with the USF&WS.</p>	<p>Continue to inventory and monitor T&E plant and animal habitats. Continue T&E clearances and Section 7 consultations with the USF&WS.</p>	<p>Continue to inventory and monitor T&E plant and animal habitats. Continue T&E clearances and Section 7 consultations with the USF&WS.</p>	<p>Continue to inventory and monitor T&E plant and animal habitats. Continue T&E clearances and Section 7 consultations with the USF&WS.</p>	<p>Continue to inventory and monitor T&E plant and animal habitats. Continue T&E clearances and Section 7 consultations with the USF&WS.</p>	
	<p>Require measures to protect classified or listed T&E species and habitat and potential habitat, from mineral leasing and disposal activities and disturbance, and other surface disturbance.</p>	<p>Require measures to protect classified or listed T&E species and habitat, and potential habitat from mineral leasing, mining and mineral material disposal activity and other surface disturbance.</p>	<p>Require measures to protect classified or listed T&E species and habitat, and potential habitat from mineral leasing, mining and mineral material disposal activity and other surface disturbance.</p>	<p>Require measures to protect classified or listed T&E species and habitat, and potential habitat from mining, mineral leasing and mineral material disposal activity and other surface disturbance.</p>	
<p>Designate South Beaver Creek ACEC/RNA (4,625 acres) to protect and enhance skiff milkvetch populations.</p>	<p>Designate South Beaver Creek and Redcloud Peak RNA/ACECs (15,512 acres) to protect and enhance skiff milkvetch and Uncompahgre fritillary butterfly populations and habitat.</p>	<p>Designate South Beaver Creek and Redcloud Peak RNA/ACECs (15,512 acres) to protect and enhance skiff milkvetch and Uncompahgre fritillary butterfly populations and habitat.</p>	<p>Designate South Beaver Creek and Redcloud Peak RNA/ACECs (15,512 acres) to protect and enhance skiff milkvetch and Uncompahgre fritillary butterfly populations and habitat.</p>	<p>Designate South Beaver Creek and Redcloud Peak ACECs (10,512 acres) to protect and enhance skiff milkvetch and Uncompahgre fritillary butterfly populations and habitat.</p>	

Table 1-1 (Cont'd)

SUMMARIZED COMPARISON OF THE PROPOSED PLAN AND THE MANAGEMENT ALTERNATIVES

RE-SOURCE/ RE-SOURCE USE	MANAGEMENT UNDER EACH ALTERNATIVE					
	ALTERNATIVE A (Continuation of Current Management)	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D	ALTERNATIVE E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
	OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.	OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.	OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, or protecting, or enhancing the natural environment at a compatible and non-restricting level.	OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.
WILDLIFE HABITAT MANAGEMENT	<p>Continue management of habitat according to HMP for Resource Area, at current rate of implementation.</p> <p>Maintain big game forage allocations at present levels; future increases/decreases would be divided evenly between big game and livestock.</p> <p>Initiate shrub-seedling planting program to improve crucial winter range.</p> <p>Planning Area open to habitat treatments. Maintain existing facilities and treatments.</p> <p>Modify 10 miles of fence to facilitate antelope access to habitat. Wildlife forage allocations would be adjusted to allocate more for antelope as needed.</p>	<p>Revise HMP for Resource Area.</p> <p>Generally maintain wildlife forage allocations at current levels, including for big game. All future additional forage would be allocated in priority order, for watershed needs, wildlife habitat, and livestock grazing.</p> <p>Minimize, or exclude disturbance at raptor nest sites, and on crucial big winter game ranges, elk calving areas, and at sage grouse leks and on sage grouse habitat, by seasonal or other stipulations, OHV designations, and rights-of-way avoidance and exclusion areas.</p> <p>Temporary long-range herd goal reductions in certain GMUs recommended to increase vigor and production on crucial big game winter</p>	<p>Revise HMP for Resource Area.</p> <p>New, additional available forage to livestock, then watershed.</p> <p>Elk calving areas would not be intensively managed and except for rights-of-way avoidance and seasonal rights-of-way related construction stipulations, no land use restrictions apply.</p> <p>Long-range herd goal reductions in certain GMUs recommended temporarily to increase vigor production of crucial big game winter range in order to help support CDOW long-range herd goals of 9,000 elk and 16,600 deer.</p> <p>Compatible treatments also designed and implemented, on uplands and riparian areas, through activity plans to help achieve CDOW herd goals for</p>	<p>Revise HMP for Resource Area and emphasize crucial winter range management.</p> <p>Maintain wildlife forage allocations at current levels. All future additional forage would be allocated to watershed needs.</p> <p>Disturbance would be seasonally restricted on all elk-calving areas. Measures to prevent raptor disturbance required in all plans involving surface disturbance.</p> <p>Temporary reductions in CDOW long-range herd goals in certain GMUs recommended to help support herd sizes of 9,000 elk and 16,600 deer. Measures (treatments) would also be implemented through activity plans on uplands and riparian zones to help achieve these herd goals.</p>	<p>Revise RA HMP and implement consistent with <u>BLM's Fish and Wildlife Plan for Colorado - Program for the Decade.</u></p> <p>Maintain wildlife forage allocations at current levels, including for big game. All future additional forage would be allocated for watershed needs, then for wildlife habitat or livestock grazing.</p> <p>Minimize, or exclude disturbance at raptor nest sites, and on crucial big game winter ranges, elk calving areas, and at sage grouse leks and on sage grouse habitat, by seasonal or other stipulations, OHV designations, and rights-of-way avoidance and exclusion areas.</p>	<p>Revise RA HMP and implement consistent with <u>BLM's Fish and Wildlife Plan for Colorado - Program for the Decade.</u></p> <p>BLM would continue to participate in the Colorado Habitat Partnership Program.</p> <p>Big game numbers would be reduced temporarily if needed to achieve proper use levels and better forage conditions. All future additional forage from wildlife projects would be allocated for watershed needs, then for wildlife habitat.</p> <p>Minimize, or exclude disturbance at raptor nest sites, and on crucial big game winter ranges, elk calving areas, and at sage grouse leks and on sage grouse habitat, by seasonal or other stipulations, OHV designations, and rights-of-way avoidance and exclusion areas.</p>

Table 1-1 (Cont'd)

SUMMARIZED COMPARISON OF THE PROPOSED PLAN AND THE MANAGEMENT ALTERNATIVES

MANAGEMENT UNDER EACH ALTERNATIVE

RE-SOURCE/ RE-SOURCE USE	ALTERNATIVE A (Continuation of Current Management)	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D	ALTERNATIVE E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
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<p>OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.</p>	<p>OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.</p>	<p>OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, or protecting, or enhancing the natural environment at a compatible and non-restricting level.</p>	<p>OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.</p>	<p>OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.</p>	<p>OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.</p>
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WILDLIFE
HABITAT
MANAGEMENT
(Cont'd)

<p>Improve or maintain non-game habitat as timber harvests are implemented.</p>	<p>New, compatible wildlife treatments permitted, and existing treatments maintained, if the timber base or livestock forage is not decreased on 457,692 acres in units C-1, C-4, C-5, and C-7.</p>	<p>Intensively manage and minimize disturbance to sage grouse brood-rearing habitat and minimize disturbance to sage grouse in riparian areas in unit D-12 (9,657 acres); intensively manage unit D-14 (76,752 acres) for sage grouse nesting/high production areas, minimize disturbance to grouse, and protect all leks.</p>	<p>Improve or maintain non-game habitat as timber harvests are implemented.</p>	<p>Implement treatments and other measures to increase forb and shrub species on elk and deer crucial winter ranges, as activity plans are implemented.</p>
<p>Implement treatments and other measures to increase forb species, and shrub species on elk and deer crucial winter ranges, as activity plans are implemented.</p>	<p>Vegetation improvement projects permitted in riparian zones for wildlife and bald eagle habitat in units C-9, C-10, and C-11 (1,839 acres).</p>	<p>Designate Bighorn-A, Bighorn-B, and Cebolla Creek ACECs (18,486 acres) and manage to minimize disturbance to bighorn sheep, to protect lambing areas, and to prevent disease transfer from domestic sheep to bighorn sheep. Cooperative livestock grazing pursued on Forest Service lands adjacent to Bighorn-A/B ACECs.</p>	<p>Implement treatments and other measures to increase forb and shrub species on elk and deer crucial winter ranges, as activity plans are implemented.</p>	<p>About 7,122 acres of habitat in unit 10 would be managed to minimize disturbance to bighorn sheep and potential lambing areas along Cebolla Creek and Cochetopa Creek. A HMP would be prepared for the unit.</p>
<p>Manage sage grouse brood-rearing habitat in riparian areas to improve or provide forage and hiding/cover for young chicks.</p>	<p>Manage sage grouse brood-rearing habitat in riparian areas to improve or provide forage and hiding/cover for young chicks.</p>	<p>Manage sage grouse brood-rearing habitat in riparian areas (about 35 miles in E-14) to improve or provide forage and hiding cover for young chicks. Improve and maintain</p>	<p>About 7,122 acres of habitat in unit E-10 would be managed to minimize disturbance to bighorn sheep and potential lambing areas along Cebolla Creek and Cochetopa Creek. A HMP would be prepared for the unit.</p>	<p>Manage sage grouse brood-rearing habitat in riparian areas (about 35 miles in unit 14) to improve or provide forage and hiding cover for young chicks. Sagebrush management guidelines in Appendix A would be incorporated for improvement of sage grouse habitat.</p>
<p>Consider moose introduction in Powderhorn ACEC.</p>	<p>Consider moose introduction in Powderhorn ACEC.</p>	<p>Consider moose introduction in Powderhorn ACEC.</p>	<p>Consider moose introduction in Powderhorn ACEC.</p>	<p>Consider moose introduction in Powderhorn ACEC.</p>
<p>Consider moose introduction in Powderhorn ACEC.</p>	<p>Consider moose introduction in Powderhorn ACEC.</p>	<p>Consider moose introduction in Powderhorn ACEC.</p>	<p>Consider moose introduction in Powderhorn ACEC.</p>	<p>Consider moose introduction in Powderhorn ACEC.</p>

**WILDLIFE
HABITAT
MANAGEMENT
(Cont'd)**

Lake Fork ACEC (4,800 acres) managed to prevent disturbance to wintering elk and deer, and seasonal disturbance to lambing highorn sheep.

sagebrush to optimize populations in unit E-11, and incorporate sagebrush treatments and other habitat improvements in AMPs, CRMAPs, etc.

not designated as wilderness by Congress.

Reintroduction or introduction of sharp-tail grouse and Merriam's turkey would be considered.

Consider moose introduction in Powderhorn Primitive Area SRMA, if not designated as wilderness.

**FISHERY
RE-SOURCES
(AQUATIC
HABITAT)**

<p>Revise area-wide HMP to include site specific fishery improvement projects or strategies developed from inventory information to first prioritize, then restore and enhance fisheries.</p>	<p>Intensively manage 74 miles of fishery streams on public land in Management unit B-9 to improve conditions.</p> <p>North Willow Creek in Allotment 6202 allowed to recover by temporarily eliminating livestock grazing.</p> <p>Require measures to prevent deterioration and damage to fishery streams in all plans involving surface disturbance.</p>	<p>Same as Alternative A, and in unit C-9, conditions in and along 10 miles of streams within 1,117 acres of big game riparian zones would be improved.</p>	<p>Same as Alternative A, and within Lake Fork ACEC, emphasize with other resources, the fishing recreation opportunity.</p> <p>Intensively manage and improve conditions along fishery streams in unit D-11 and D-13 containing 116 miles of riparian zones (12,654 acres).</p> <p>Install compatible fishery improvement projects in unit D-19.</p> <p>Require measures to prevent deterioration and damage to fishery streams in all plans involving surface disturbance.</p>	<p>Same as Alternative A, and fishery streams and associated riparian areas managed to improve overall conditions and to enhance fisheries. Projects for fishery improvement to be included in activity plans as they are prepared or revised.</p> <p>Intensively manage 58 miles of fishery streams on public land in Management Unit E-15 to improve conditions.</p> <p>North Willow Creek in Allotment 6202 would be allowed to recover by temporarily eliminating livestock grazing.</p> <p>Compatible projects permitted in unit E-2, Powderhorn Primitive area SRMA.</p> <p>Require measures to prevent deterioration and damage to fishery streams in all plans involving surface disturbance.</p>	<p>Same as Alternative E except management units would not be prefixed with the letter E.</p>
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**LIVESTOCK
GRAZING
MANAGEMENT**

<p>About 474,600 suitable acres would be available for grazing in existing allotments and 47,256 AUMs would be available for allocation. About 46,200 suitable acres would not be available for grazing (2,585 acres would be disposed of). About 64,192 acres throughout the Planning Area are not suitable for grazing in all alternatives.</p>	<p>About 445,912 suitable acres would be available for grazing in existing allotments and about 41,948 AUMs would be available for allocation. About 31,273 suitable acres would not be available for grazing, in addition to suitable unavailable acres in Alternative A.</p> <p>Livestock management to be generally as per 1987 RPS and updates. Some Management units modify existing allocations to resolve resource conflicts.</p>	<p>About 519,146 suitable acres would be available for grazing in existing allotments and on lands not currently allotted or grazed. About 51,684 AUMs would be available for allocation. Only 1,674 suitable acres would not be available for grazing.</p> <p>Livestock grazing generally managed as per 1987 RPS and updates.</p>	<p>About 443,120 suitable acres would be available for grazing in existing allotments, and about 35,022 AUMs would be available for allocation. About 34,065 suitable acres would not be available for grazing, in addition to suitable unavailable acres in Alternative A.</p> <p>Livestock management to be generally as per 1987 RPS and updates. Some Management Units modify existing allocations to resolve resource</p>	<p>About 470,828 suitable acres would be available for grazing in existing allotments, and about 46,526 AUMs would be available for allocation. About 6,757 suitable acres would not be available for grazing, in addition to suitable unavailable acres in Alternative A.</p> <p>Livestock management to be generally as per 1987 RPS and updates. Some Management units modify existing</p>	<p>About 470,460 acres of suitable public lands would be available for livestock grazing and about 46,904 AUMs would be available for allocation. Public lands unsuitable or unavailable for livestock grazing would continue to be excluded from livestock grazing unless monitoring or other data indicate that the areas may be grazed. Allotment categorization would be re-examined as needed based upon a change in categorization factors identified from</p>
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Table 1-1 (Cont'd)

SUMMARIZED COMPARISON OF THE PROPOSED PLAN AND THE MANAGEMENT ALTERNATIVES

RE-SOURCE/ RE-SOURCE USE	MANAGEMENT UNDER EACH ALTERNATIVE					
	ALTERNATIVE A (Continuation of Current Management)	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D	ALTERNATIVE E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
	OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.	OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.	OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, or protecting, or enhancing the natural environment at a compatible and non-restricting level.	OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.
LIVESTOCK GRAZING MANAGEMENT (Cont'd)	<p>Livestock grazing use and allocations to be generally as per 1987 RPS and updates.</p> <p>Riparian areas consistently utilized in heavy range would be examined and adjustments made to less-than-heavy utilization until AMPs are revised or developed.</p> <p>28 AMPs to be revised; 10-20 new AMPs or CRMAs to be developed.</p> <p>A cooperative noxious weed control program would be initiated.</p> <p>Existing treatments and facilities maintained; new treatments and facilities developed if needed to achieve AMP objectives.</p> <p>No livestock grazing would continue on 320 acres in</p>	<p>Livestock allocations could be modified further if studies or data indicate changes are necessary.</p> <p>New or additional available forage would be allocated or used to meet watershed objectives, then for wildlife or livestock grazing.</p> <p>A cooperative noxious weed control program would be initiated.</p> <p>IGMCs would be implemented [range readiness on all lands grazed, minimum stubble height in riparian areas (6", 4" and 2-1/2") maximum total forage utilization rate 40-60% on uplands] on entire planning area.</p> <p>AMPs or CRMAs would be developed on "I" allotments according to schedules in the</p>	<p>Future forage allocations generally would be for livestock grazing management, then for watershed resources.</p> <p>A cooperative noxious weed control program would be initiated.</p> <p>IGMCs would be implemented (range readiness on all lands grazed, and total forage utilization on all lands grazed of 40-60%) in the Planning Area.</p> <p>AMPs or CRMAs would be developed or revised for "I" allotments as scheduled in 1987 RPS and updates. Existing categorization to be reviewed and changes made if necessary.</p> <p>Existing livestock treatments would be maintained, and new facilities would be developed according to AMPs and CRMAs.</p>	<p>conflicts. Livestock allocations could be modified further if studies or data indicate changes are necessary.</p> <p>New or additional available forage would be allocated or used to meet watershed objectives.</p> <p>A cooperative noxious weed control program would be initiated.</p> <p>IGMCs (20-40% total forage utilization levels on uplands, 4" minimum stubble height in riparian areas, and range readiness) would be implemented on all allotments.</p> <p>AMPs would be developed or revised based on the objectives of this alternative and the schedule in the 1987 RPS and updates.</p>	<p>allocations to resolve resource conflicts. Livestock allocations could be modified further if studies or data indicate changes are necessary.</p> <p>New or additional available forage would be allocated or used to meet watershed objectives.</p> <p>A cooperative noxious weed control program would be initiated.</p> <p>Implement a total forage utilization level of 40-60% on all uplands; 4" minimum stubble heights in riparian zones units E-14 and E-15, and about 92 miles of riparian zones in units E-1, E-2, and E-13; 2-1/2" stubble heights in all other riparian zones, and range readiness would be implemented on all allotments.</p>	<p>monitoring data or other management and resource data.</p> <p>Categorization and management of "M" and "C" allotments in the 1987 RPS would continue unless monitoring data and/or other resource information indicates adjustments are necessary. On category "1" allotments, existing management or forage allocation levels would be adjusted to achieve or maintain desired plant communities and to help meet the following resource needs.</p> <p>1. <u>On uplands</u> - utilization of key forage species managed to allow for plant health or maintenance, watershed cover, and quality forage and wildlife cover. Maximum use on allotments without activity plans/agreements designed to achieve above goals would be 40-60% of current year's</p>

Wildcat Creek Drainage to maintain Crested Butte's water supply. 1987 RPS and updates. 6,909 acres (about 1,100 suitable acres) in Unit C-7 Existing categorization to be reviewed and changes to categorization made if necessary. AMPs or CRMAPs would be revised or developed at the rate of about 1-2 plans annually. Existing categorization for all allotments to continue.

No livestock grazing would continue on 320 acres to Wildcat Creek drainage to maintain Crested Butte's water supply. Existing livestock facilities would be maintained, and new facilities and treatments developed according to AMPs or CRMAPs. No livestock grazing would continue on 320 acres in Wildcat Creek drainage to maintain Crested Butte's water supply. Existing livestock facilities would be maintained, and new facilities and treatments developed according to AMPs or CRMAPs.

Land treatments, maintenance, and facility developments would be restricted on about 229,585 suitable acres in various management units. Treatments and facilities would be excluded on 3,242 acres. Land treatments and facility developments would be restricted on 362,320 acres. No livestock grazing would continue on 320 acres in Wildcat Creek drainage to maintain Crested Butte's water supply. Existing livestock facilities would be maintained, and new facilities and treatments developed according to AMPs or CRMAPs.

Livestock use would be restricted, in addition to that from IGMCs, on about 112,395 acres (80,918 acres seasonally, 31,077 acres for ROS setting maintenance; and on 400 acres for reforestation in unit B-16. Domestic sheep bedding would not be permitted in unit C-10. A fenced tract of public land along the Slate River in Allotment 6401 would be unavailable for livestock grazing in order to maintain recreation resources (about 320 suitable acres). Treatments and facilities would be excluded on 69,634 acres. Cooperative U.S.F.S. management on Forest Service lands adjacent to units D-4, D-5, and D-17 would be pursued for enhanced bighorn sheep management. Livestock use would be restricted on about 207,951 acres of suitable public lands.

production during period of use.

2. In riparian areas except in units 14 or 15 - utilization of key forage species limited to 40-60% current year's production, with 2-1/2" minimum stubble height during period of use. Utilization levels less than 40% may be prescribed in severely degraded riparian areas. Flexibility permitted for stubble height if management strategies defined in activity plans/agreements would achieve riparian management objectives. See Livestock Grazing Management STANDARD MANAGEMENT in Chapter 4 for more detail.

3. In riparian areas in Management Unit 14 - Maintain a 4" minimum stubble height from 6/15 through 7/31 for protection of sage grouse during brood rearing. A 2-1/2" minimum required at all other times.

4. In riparian areas in Management Unit 15 - Maintain a 4" minimum stubble height.

See Livestock Grazing Management in STANDARD MANAGEMENT, Chapter 4 for more detail. Minimum stubble requirement would be flexible in areas covered by activity plans/agreements that would achieve unit 14 or 15 management goals. Flexibility would be allowed also in areas where a 4" height would not be achieved immediately.

Riparian concerns would be addressed utilizing above guidance as needed when revising or preparing new

Table 1-1 (Cont'd)

SUMMARIZED COMPARISON OF THE PROPOSED PLAN AND THE MANAGEMENT ALTERNATIVES

RE-SOURCE/ RE-SOURCE USE	MANAGEMENT UNDER EACH ALTERNATIVE					PROPOSED RESOURCE MANAGEMENT PLAN
	ALTERNATIVE A (Continuation of Current Management)	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D	ALTERNATIVE E (Preferred Alternative)	
	OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.	OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.	OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, or protecting, or enhancing the natural environment at a compatible and non-restricting level.	OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.

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LIVESTOCK
GRAZING
MANAGEMENT
(Cont'd)

activity plans. Guidance above would be incorporated into all existing activity plans.

Additional forage available for livestock as a result of range improvements or treatments would be allocated according to 43CFR 4100, after considering basic soil and watershed needs as defined in the Montrose District Soil Erosion Monitoring Guidelines (See Appendix N). Additional forage would be considered in reactivating suspended use, or as a means to avoid suspending active use.

A cooperative noxious weed control program would be initiated.

Range readiness criteria would be considered when requests for livestock turn-out dates are earlier than dates specified in permits and when vegetation growing conditions are affected by drought or other natural or man-caused influences, such as fire.

Range readiness would be incorporated into existing AMPs utilizing criteria in Appendix B. Range readiness criteria in Appendix B would be used until specific criteria can be written into each AMP or other activity plan. See Appendix B for more detail.

Existing activity plans (AMPs, CRMPs, etc.) would be evaluated and either modified or revised using a coordinated interdisciplinary approach, and new activity plans would also be developed with interdisciplinary input and consultation with permittees and other affected interests.

Range improvements such as fences, water developments, burns, spray treatments, and others would continue to be identified and prescribed in activity plans or agreements. Existing range improvements would continue to be maintained as assigned in cooperative agreements and range improvement permits.

No livestock grazing would continue on 320 acres in Wildcat Creek drainage to maintain Crested Butte's water supply.

Land treatments and facility developments would be restricted on 201,644 acres.

Table 1-1 (Cont'd)

SUMMARIZED COMPARISON OF THE PROPOSED PLAN AND THE MANAGEMENT ALTERNATIVES

RE-SOURCE/ RE-SOURCE USE	MANAGEMENT UNDER EACH ALTERNATIVE						PROPOSED RESOURCE MANAGEMENT PLAN
	ALTERNATIVE A (Continuation of Current Management)	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D	ALTERNATIVE E (Preferred Alternative)		
	<p>OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.</p>	<p>OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.</p>	<p>OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, or protecting, or enhancing the natural environment at a compatible and non-restricting level.</p>	<p>OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.</p>	<p>OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.</p>	<p>OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.</p>	

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LIVESTOCK
GRAZING
MANAGEMENT
(Cont'd.)

Treatments and facilities would be excluded on 4,294 acres.

Livestock use would be restricted on about 201,644 acres of suitable public lands.

Monitoring would be conducted through interdisciplinary coordination and would be used when evaluating stated objectives or actions on an allotment or specific area.

**FOREST
MANAGEMENT**

About 44,062 acres of suitable commercial forest lands and 19,262 acres of suitable woodlands would be available for harvest, resulting in a possible annual harvest of 1,200 MBF of commercial timber, 400 cords of fuelwood, 400 wildings, and, on average, 300 Christmas trees; 50 acres of site preparation and 50 acres of reforestation would be completed annually.

One FMP would be written.

Seasonal restrictions apply in elk calving areas; harvest in riparian areas restricted or excluded on a case-by-case basis.

About 39,442 acres of suitable commercial forest lands and 24,405 acres of suitable woodlands would be available for harvest, resulting in a possible annual harvest of 1,180 MBF of commercial timber, 505 cords of fuelwood; 250 acres of reforestation completed annually. Other forest products (400 wildings, and, on average, 300 Christmas trees) would be harvested or would possibly be available.

One FMP would be written.

Restrictions apply on crucial elk and deer winter range (seasonal) and elk calving areas (seasonal and leave areas).

About 58,959 acres of suitable commercial forest lands and 19,262 acres of suitable woodlands would be available for harvest, resulting in a possible annual harvest of 1,770 MBF of commercial timber, approximately 400 cords of fuelwood, 400 wildings and, on average, 300 Christmas trees.

About 34,679 acres of suitable commercial forest lands and 27,352 acres of suitable woodlands would be available for harvest resulting in a possible annual harvest of 1,040 MBF of commercial timber, 565 cords of fuelwood, 400 wildings, and, on average, 300 Christmas trees. 500 acres of reforestation would be accomplished in unit D-21.

Timber harvests would be designed to be compatible with these alternative objectives.

One FMP would be prepared.

Harvest or design restrictions apply in riparian zones, Slumgullion slide, areas exhibiting erodible soils, crucial big game winter range, within SRMAs, on areas where slopes exceed 35 percent, or for nongame wildlife habitat and other recreation resources (harvest restrictions are seasonal or exclusion).

About 41,347 acres of suitable commercial forest lands and 23,615 acres of suitable woodlands would be available for harvest, resulting in a possible annual harvest of 1,200 MBF of commercial timber, 490 cords of fuelwood, 400 wildings, and, on average, 300 Christmas trees. Backlog reforestation would be accomplished as funds become available.

Timber harvests would be designed to be compatible with these alternative objectives.

One FMP would be prepared, incorporating existing FMPs.

Harvest restrictions (total exclusions, design requirements or seasonal restrictions) apply in riparian zones, existing WSAs, Slumgullion Earthflow, on areas exhibiting erodible soils, crucial big game winter range, elk calving areas, within SRMAs, on areas where slopes exceed 35 percent, or for nongame wildlife habitat and other recreation resources.

Same as Alternative E.

**RECREATION
MANAGEMENT**

Continue within limits of Alternative A, implementation and management of San Juan Triangle and Cochetopa Canyon SRMAs according to activity plans for a diversity of opportunities.

A joint BLM/USFS visitor center in Lake City would be pursued.

Powderhorn SRMA would be managed for non-motorized primitive recreation experiences. Develop activity plan if not designated as wilderness,

Fully implement activity plans for San Juan Triangle and Cochetopa Canyon SRMAs according to activity plans, and manage for a diversity of opportunities, motorized/non-motorized.

Designate Powderhorn SRMA as an ACEC and manage for primitive non-motorized recreation opportunities and experiences. Restrict use to designated sites. Pursue acquisition and eventual withdrawal of state-owned minerals. Drop "primitive"

RAMPs for San Juan Triangle and Cochetopa SRMAs would be revised to reflect this alternative. Non-conflicting facilities would be developed. ROS settings would be revised, if needed, to reflect revised RAMPs.

San Juan Triangle SRMA: Maintain a variety of ROS settings; compatible small scale recreation developments would be permitted; floatboating, sight-seeing, fishing, and some historic site stabilization would be emphasized.

Existing RAMPs for Cochetopa and San Juan Triangle SRMA would be revised. Actions in RAMPs would be implemented to minimize conflicts of recreation use and facility development with natural values. ROS settings to be re-determined for SRMAs if needed. Patrols are to be conducted and signing is to be installed.

Powderhorn SRMA Unit D-19 (44,767 acres) managed to enhance natural values and primitive recreation opportu-

Cochetopa Canyon SRMA would be managed to continue to provide and improve the existing diversity of recreation opportunities emphasizing fishing and overnight camping in a Roaded Natural ROS setting. A CRMAP would be prepared.

Alpine Triangle SRMA would be managed for a variety of ROS settings and opportunities, including interpretation, historic, scenic, and natural values, and hiking, sight-seeing, motorized recreation,

Same as Alternative E., except Recreation resources in Cochetopa Canyon SRMA would be managed according to existing activity plan, and no CRMAP would be prepared. No RAMP would be prepared for the Gunnison ERMA, and ROS settings would not be determined. Recreation project plans would be developed in the ERMA for sites proposed for construction. Management units would not be prefixed with the letter E.

CHAPTER ONE - COMPARISON TABLE, PRMP AND ALTERNATIVES

Table 1-1 (Cont'd)

SUMMARIZED COMPARISON OF THE PROPOSED PLAN AND THE MANAGEMENT ALTERNATIVES

MANAGEMENT UNDER EACH ALTERNATIVE

RE-SOURCE/ RE-SOURCE USE	ALTERNATIVE A (Continuation of Current Management)	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D	ALTERNATIVE E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
	OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.	OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.	OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, or protecting, or enhancing the natural environment at a compatible and non-restricting level.	OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.

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RECREATION
MANAGEMENT
(Cont'd.)

and continue Primitive Area status.	title upon designation. Trails would be constructed and maintained.	Cochetopa SRMA: A Roaded natural ROS setting would be maintained, emphasizing fishing and camping along Colorado Highway 114. Signing would be installed, as well as non-conflicting facilities for camping, parking, sanitation, and picnicking.	nities in Primitive and Semi-Primitive Non-Motorized ROS settings. Commercial use levels would be established. A private recreation permit system, with use levels, would be initiated if recreation activities result in adverse impacts to natural values. Camping limited to designated sites. Prepare RAMP for the SRMA. Conduct patrols.	camping, winter recreation, hunting, fishing and floatboating. A CRMAP would be prepared for this SRMA. A joint BLM/FS visitor center in Lake City would be pursued. If feasible, facilities at Red Bridge and The Gate campgrounds would be upgraded and fees charged.	Same as Alternative E., except Recreation resources in Cochetopa Canyon SRMA would be managed according to existing activity plan, and no CRMAP would be prepared. No RAMP would be prepared for the Gunnison ERMA, and ROS settings would not be determined. Recreation project plans would be developed in the ERMA for sites proposed for construction. Management units would not be prefixed with the letter E.
Remainder of planning area, in the Gunnison ERMA, to be managed for extensive recreation use and a variety of opportunities.	The Gunnison ERMA would be managed for a diversity of recreation opportunities. Prepare an activity plan and determine ROS settings.	Powderhorn SRMA: Emphasize compatible backcountry and scenic, semi-primitive, recreation opportunities (hiking, camping, fishing, hunting, mountain biking, sight-seeing, and backpacking). Prepare RAMP.	Designate Slumgullion Slide ACEC (1,270 acres) and restrictively manage for natural value protection, including scenic resources and water	Powderhorn Primitive Area SRMA would be managed for enhancement of natural values and primitive recreation opportunities in Primitive and Semi-Primitive ROS settings. Commercial recreation per-	
Off-highway vehicle (OHV) designations (373,916 acres open, 92,927 acres limited to designated routes yearlong, 74,707 acres limited seasonally to designated routes if necessary for wintering elk and deer, and 43,462 acres closed) would	Designate Alpine ACEC (88,663 acres) and manage for a diversity of motorized/non-motorized recreation uses; Emphasize facility development and intensive recreation management.				

continue with minor changes to be made,

No eligible segments of the Lake Fork of the Gunnison River would be recommended as being suitable for inclusion into the National Wild and Scenic Rivers system.

Designate Lake Fork ACEC (4,685 acres) and manage for recreation, scenic, and historic resources. Emphasize fishing, float-boating, and historic site stabilization and interpretation.

Develop and manage a 400 acre tract site along the Slate River for day-use and overnight use.

Develop an overnight campground on High Mesa. Construct a hiking trail into the Rock Creek area.

Continue to manage OHV use as in Current Management with these exceptions: close the Powderhorn ACEC (48,033 acres), and close 600 acres adjacent to Sapinero State Wildlife Area. Approximately 368,745 acres would be designated open to OHV use; OHV use on 92,927 acres would be limited to designated routes yearlong; OHV use on 74,707 acres would be limited seasonally, if necessary, in crucial winter range, and 48,633 acres would be closed to OHV use.

Patrols would be conducted periodically, and facilities would be maintained in SRMAs.

Remainder of public lands would be managed for extensive, dispersed recreation uses.

Public lands would be designated, regarding OHV use, as closed (600 acres), limited seasonally to designated routes, if necessary for wintering elk and deer (74,707 acres) and open (509,705 acres).

quality, and interpretation of geologic phenomena. No surface disturbance permitted.

Designate the 4,800 acre Lake Fork ACEC and manage for fishing, floatboating, and historic site stabilization and interpretation. Manage historic sites cooperatively with the NPS.

The remainder of the Planning Area would be managed for extensive recreation use, within the Gunnison ERMA. Small scale day use and overnight facilities would be developed at High Mesa and on a tract on the Slate River.

Public lands would be designated, regarding OHV use, as closed (57,851 acres), limited seasonally, if necessary, for wintering elk and deer, (79,995 acres), limited to designated routes yearlong (127,870 acres) and open (319,296 acres).

mitting would continue, and use levels established if necessary. If necessary, use levels and a permit system for private recreation use would be established. A RAMP would be prepared. The Primitive Area Boundary would be adjusted to include all public lands in unit E-2. Pursue acquisition of 40 acres of non-federal lands, and state-owned minerals.

Designate and manage American Basin ACEC (1,595 acres) and Dillon Pinnacles ACEC (532 acres) for scenic and recreation values; designate and manage Slumgullion Earthflow National Natural Landmark ACEC (1,407 acres) for interpretation.

The remainder of the Planning Area would be managed for extensive recreation use, within the Gunnison ERMA. A RAMP would be prepared and ROS settings determined. Small scale recreation facilities would be considered at Hartman's Rocks, High Mesa and the Slate River.

Public Lands would be designated regarding OHV use, as closed (48,877 acres), limited seasonally, if necessary, for wintering elk and deer, (74,428 acres), limited to designated routes yearlong (97,714 acres) and open (363,993 acres). The Powderhorn Primitive Area SRMA would also be closed to mountain bike use.

CHAPTER ONE - COMPARISON TABLE, PRMP AND ALTERNATIVES

Table 1-1 (Cont'd)

SUMMARIZED COMPARISON OF THE PROPOSED PLAN AND THE MANAGEMENT ALTERNATIVES

MANAGEMENT UNDER EACH ALTERNATIVE

RE-SOURCE/ RE-SOURCE USE	ALTERNATIVE A (Continuation of Current Management)	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D	ALTERNATIVE E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
	OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.	OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.	OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, or protecting, or enhancing the natural environment at a compatible and non-restricting level.	OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.

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ELIGIBLE WILD AND SCENIC RIVER STUDY SEGMENTS	13.3 mile Segment A of Lake Fork of the Gunnison River not recommended as being suitable for inclusion into National Wild and Scenic Rivers System.	13.3 mile Segment A of Lake Fork of the Gunnison River recommended as being suitable for inclusion into National Wild and Scenic Rivers System under the "Recreation" classification.	Same as Alternative A.	Same as Alternative B.	Same as Alternative A.	Same as Alternative A.
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VISUAL RE-SOURCES	Visual resources would be managed according to existing VRM classes: VRM Class I - 43,590 acres VRM Class II - 173,510 acres VRM Class III - 126,645 acres VRM Class IV - 236,845 acres VRM Class IIR, IIIR, and IVR - 4,422 acres	Public lands would be managed according to the following VRM classes: VRM Class I - 48,033 acres VRM Class II - 170,567 acres VRM Class III - 132,560 acres VRM Class IV - 229,610 acres VRM Class IIR, IIIR, and IVR - 4,242 acres	Public lands would be managed according to the following VRM classes: VRM Class I - 7,840 acres VRM Class II - 37,877 acres VRM Class III - 10,811 acres VRM Class IV - 528,309 acres VRM Class IIR, IIIR, and IVR - 175 acres.	Public lands would be managed according to the following VRM classes: VRM Class I - 47,904 acres VRM Class II - 311,598 acres VRM Class III - 219,964 acres VRM Class IV - 1,200 acres VRM Class IIR, IIIR, and IVR - 4,346 acres	Visual resources would be managed according to VRM classes: VRM Class I - 49,872 acres VRM Class II - 169,614 acres VRM Class III - 135,738 acres VRM Class IV - 225,776 acres VRM Class IIR, IIIR, IVR - 4,012 acres	Same as Alternative E.
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Mitigation required in all plans for surface disturbance in 88,663-acre Alpine ACEC.

Designate Lake Fork ACEC (4,685 acres) and manage for visual resources, recreation opportunities, historic site stabilization and interpretation.

Designate American Basin ACEC (1,577 acres) and manage to protect and enhance visual and other natural resources. Surface disturbance not permitted.

Designate Lake Fork ACEC (4,800 acres) and manage for visual resources, recreation opportunities, historic site stabilization and interpretation.

Designate Dillon Pinnacles ACEC (190 acres) and manage to protect scenic resources and recreation opportunities. Surface disturbing activities not permitted.

Designate American Basin ACEC (1,595 acres) and Dillon Pinnacle ACEC (532 acres) and manage for scenic and recreation opportunities. Federal mineral estate in these ACECs would be withdrawn from mineral entry and location.

1-27
WILDER-
NESS
STUDY
AREAS
(WSAs)

Six WSAs (114,247 acres) managed according to BLM's IMP; 49,479 acres are recommended as being suitable for wilderness designation in four WSAs. Areas acted on and not designated wilderness would be managed according to existing laws, policy and regulations. Areas designated as wilderness would be managed as such, and a management plan written.

Same as Alternative A.

MANAGEMENT OF LANDS IN WSAs IN ALTERNATIVES B, C, D & E AND THE IMPACTS OF THESE ALTERNATIVES ON LANDS WITHIN EXISTING WSAs ARE PRESENTED AND ANALYZED IN CHAPTERS THREE AND FOUR OF THIS RMP/EIS IN THE EVENT CONGRESS ACTS UPON AND DOES NOT DESIGNATE PARTS OR ALL OF WSAs AS WILDERNESS. UNTIL CONGRESS ACTS, IMPACTS IN WSAs WOULD BE LIMITED TO THOSE THAT COULD OCCUR UNDER BLM's INTERIM MANAGEMENT POLICY FOR LANDS UNDER WILDERNESS REVIEW (IMP).

ARCHAEOLOGICAL RE-SOURCES

Managed according to existing legislation and policies that require measures to protect significant resources in all plans involving surface-disturbing activities. Class I and III inventories and clearances conducted prior to disturbance.

Same as Alternative A and Same as Alternative A. inventory for site information to build archae-ological data base for management.

Same as Alternative A.

Same as Alternative B.

Same as Alternative B.

CHAPTER ONE - COMPARISON TABLE, PRMP AND ALTERNATIVES

Table 1-1 (Cont'd)

SUMMARIZED COMPARISON OF THE PROPOSED PLAN AND THE MANAGEMENT ALTERNATIVES

RE-SOURCE/ RE-SOURCE USE	MANAGEMENT UNDER EACH ALTERNATIVE					
	ALTERNATIVE A (Continuation of Current Management)	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D	ALTERNATIVE E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
	OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.	OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.	OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, or protecting, or enhancing the natural environment at a compatible and non-restricting level.	OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.

1-28

HISTORICAL RE-SOURCES

Managed according to existing legislation and policies that require measures to protect significant resources in all plans involving surface disturbing activity. Class I and III inventories and clearances conducted prior to disturbance. Stabilization would continue on significant sites or to eliminate public safety hazards. Historic site inventories would continue.	Managed as in Alternative A and appropriate sites intensively managed and stabilized, inventory to determine new sites conducted, interpretation emphasized, and mitigation for historic sites required in all plans involving surface disturbance.	Designate Alpine ACEC (88,663 acres); special management attention to be given to historic sites, interpretation, and recreation. Inventory additional sites.	Same as Alternative A.	Same as Alternative A. In general, historic sites would be allowed to become subject to the forces of nature. Designation of Lake Fork ACEC (4,800 acres) and The Alpine Loop CRMP management for special attention would be same as for Alternative B.	Same as Alternative B, except no ACECs designated specifically for historic resource management.	Same as Alternative E.
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Designate Lake Fork ACEC(4,685 acres). Manage historic sites with NPS and inventory for additional sites.

A Cultural Resource Management Plan would be prepared for Alpine ACEC.ACEC(4,685 acres). Manage historic sites with NPS and inventory for additional sites.

A Cultural Resource Management Plan would be prepared for Alpine ACEC.

1-29

PALEONTOLOGICAL RE-SOURCES	Protective measures would be taken and site specific inventories made before surface-disturbing activity occurs in areas containing potential for the occurrence of paleontological resources.	Same as Alternative A.	Same as Alternative A.	Same as Alternative A, plus inventories and eventual monitoring conducted to identify and protect pale-ontological resources in areas containing potential for their existence.	Same as Alternative A.	Same as Alternative A.
TRANSPORTATION AND ACCESS	Continue to provide 333 miles of road access, 110 miles of trails, and 32 easements. Acquire access into 10 new areas on a priority basis within limits of alternative.	Manage and provide roads, trails, and easements as in Alternative A; except acquire access into 14 areas for road and trail access.	Manage and provide roads, trails, and easements as in Alternative A, except acquire access into 12 new areas for road and trail access.	Same as Alternative A, with priority given to access to facilitate and enhance management and protection of natural values, except acquire access into 13 areas. Road density would be limited to 1.5 linear miles/sq. mile in elk calving areas.	Same as Alternative A, except acquire access into 12 areas for road and trail access.	Same as Alternative A, except acquire access into 11 areas for road and trail access.
DISPOSAL OF PUBLIC LAND	27 tracts (2,585 acres) identified in MFPs for potential disposal by any method; 3 or 4 tracts (1,500 acres) potentially could be disposed through exchange, though none specifically proposed.	41 tracts (3,049 acres) considered for disposal via public sale (other means not precluded). Prepare disposal activity plan. Remainder of lands are Category II lands. Disposal of public lands with T&E plants (skiff milkvetch) only if overall population not jeopardized.	63 tracts (7,986 acres) considered for disposal via public sale (other means not precluded). Prepare disposal activity plan. Remainder of public lands are Category II lands.	All public lands classified as Category II lands. Disposal of public lands with T&E plants (skiff milkvetch) only if overall population not jeopardized.	Same as Alternative B.	Same as Alternative B, except that 43 tracts would be considered for disposal (3,120 acres) via public sale.

CHAPTER ONE - COMPARISON TABLE, PRMP AND ALTERNATIVES

Table 1-1 (Cont'd)

SUMMARIZED COMPARISON OF THE PROPOSED PLAN AND THE MANAGEMENT ALTERNATIVES

RE-SOURCE/ RE-SOURCE USE	MANAGEMENT UNDER EACH ALTERNATIVE					
	ALTERNATIVE A (Continuation of Current Management)	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D	ALTERNATIVE E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
	OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.	OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.	OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, or protecting, or enhancing the natural environment at a compatible and non-restricting level.	OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.

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ACQUISITION OF NON-FEDERAL LANDS

No tracts identified; acquisition would be accomplished as opportunities arise through exchange, or willing seller-willing buyer basis; FLPMA criteria and BLM criteria to be followed.	If available, acquire non-federal lands adjacent to Category II or unavailable lands, according to BLM and FLPMA criteria or to enhance management effectiveness.	If available, acquire non-federal lands adjacent to Category II lands, according to BLM and FLPMA criteria, or to enhance management effectiveness.	All non-federal lands considered suitable for acquisition on a case-by-case, willing seller/willing buyer basis with emphasis placed on lands to enhance, maintain or improve management of soils, T&E riparian vegetation, paleontological resources, visual resources, and wildlife habitat.	Same as Alternative B; if available, pursue acquisition of 40 acres of private land and state-owned minerals in Powderhorn Primitive SRMA (E-2), selected private land in Alpine Triangle SRMA (E-1), 40 acres of private land in American Basin ACEC (E-4), private lands in South Beaver Creek ACEC (E-8), and 270 acres of private lands in Dillon Pinnacles ACEC (E-9).	Same as Alternative E, except management units would not be prefixed with the letter E.
	Pursue acquisition of: 40 acres of private land and 1,980 acres of state-owned mineral estate in Powderhorn ACEC; non-federal lands: in Alpine ACEC (scenic quality and historic sites); with T&E species; with crucial elk and deer winter range; for fishing recreation access, and crucial big game winter range along Lake Fork of The		Acquisition would meet BLM and FLPMA criteria.		
			If available, acquire: 40 acres in Unit D-8, and 40 acres in Unit D-10, to facilitate		

Gunnison River (6,500 acres); with elk-calving areas; and with bighorn sheep ranges or habitat.

management effectiveness of visual and recreational resources on public land; and 40 acres of surface estate in Unit D-19 to facilitate primitive recreation opportunities on public land, and 1,920 acres of state-owned mineral estate for the same purpose.

RIGHTS-OF-WAY AND RIGHTS-OF-WAY CORRIDORS

Planning Area would be open to rights-of-way, including for major utilities and transportation; no corridors would be designated.

Public lands on 369,705 acres would be open to the location of rights-of-way, subject to case-by-case analysis; 134,970 acres contain rights-of-way related seasonal construction restrictions; 161,283 acres would be designated rights-of-way avoidance and 54,024 acres would be rights-of-way exclusion areas.

Designate a 1-mile wide rights-of-way corridor within or across all or parts of units B-9, B-10, B-11, B-14, B-15, and B-20 along WAPA's east-west 230 Kv line. Designate a 1,000-foot wide rights-of-way window across Unit B-3 and B-4 along same route.

Public lands on 573,801 acres would be open to the location of rights-of-way, subject to case-by-case analysis; 8,322 acres contain rights-of-way related seasonal construction restrictions; 1,150 acres would be designated rights-of-way avoidance and 120 acres would be rights-of-way exclusion areas.

Designate four 1-mile wide rights-of-way corridors within or across: units C-3, C-4, C-9, C-10, C-12, C-15, and C-16 (WAPA 230 Kv Curecanti-Salida line); units C-3, C-4, C-9, C-10, C-12 and C-16 (WAPA 115 Kv Blue Mesa-Gunnison-Salida line); Unit C-12 (CUEA 115 Kv Gunnison-Crested Butte line); and Units C-3, C-4, C-5, C-7, C-12, and C-16 (CUEA 115 Kv Blue Mesa-Lake City line). All corridors would be along existing electrical transmission lines. Designate two rights-of-way windows 1,000 feet wide across units C-9 and C-10 for the WAPA lines.

Public lands on 392,005 acres would be open to the location of rights-of-way, subject to case-by-case analysis; 195,751 acres would contain rights-of-way related seasonal construction restrictions; and 129,144 acres would be designated rights-of-way avoidance and 63,863 acres would be rights-of-way exclusion areas.

No rights-of-way corridors designated.

Public lands on 448,219 acres would be open to the location of rights-of-way, subject to case-by-case analysis; 155,870 acres contain rights-of-way related seasonal construction restrictions, 85,387 acres would be designated rights-of-way avoidance areas, and 51,406 acres would be rights-of-way exclusion areas.

Designate two 1-mile wide rights-of-way corridors within or across: units E-8, E-11, E-12, E-13, and E-17 (WAPA 230 Kv Curecanti-Salida line), and units E-1, E-13, and E-17 (CUEA 115 Kv Blue Mesa-Lake City line), along existing electrical transmission lines. Designate a rights-of-way window 1,000 feet wide across unit E-8 for the WAPA line.

Same as Alternative E, except management units would not be prefixed with the letter E.

FIRE MANAGEMENT

Public lands managed under full (177,335 acres) or conditional suppression (407,677 acres) policy. Some land in conditional areas to receive full suppression to protect property, life, safety, or BLM investments.

Public lands managed under full suppression (97,121 acres) or conditional suppression (575,891 acres) policy. Some lands in conditional areas to receive full suppression to protect life, safety, or BLM investments. Prescribed fires could occur.

Public lands managed under full suppression (60,760 acres) or conditional suppression (524,252 acres). Some lands in conditional suppression areas to receive full suppression to protect life, safety, or BLM investments.

Public lands managed under full suppression (59,581 acres) or conditional suppression (525,431 acres). Some lands in conditional suppression areas to receive full suppression to protect life, safety, or BLM investments.

Public lands managed under full suppression (76,624 acres) or conditional suppression (508,388 acres). Some lands in conditional suppression areas to receive full suppression to protect life, safety, or BLM investments. Prescribed fires could occur.

Same as Alternative E.

Table 1-1 (Cont'd)

SUMMARIZED COMPARISON OF THE PROPOSED PLAN AND THE MANAGEMENT ALTERNATIVES

RE-SOURCE/ RE-SOURCE USE	MANAGEMENT UNDER EACH ALTERNATIVE					PROPOSED RESOURCE MANAGEMENT PLAN
	ALTERNATIVE A (Continuation of Current Management)	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D	ALTERNATIVE E (Preferred Alternative)	
	OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.	OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.	OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, or protecting, or enhancing the natural environment at a compatible and non-restricting level.	OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.
WITH-DRAWALS AND CLASSIFI- CATIONS	Retain existing withdrawals, continue periodic withdrawal review; relinquished withdrawals managed according to adjacent public lands, current laws, policy, or regulations.	Same as Alternative A. Additional protective withdrawals recommended in certain management units.	Revoke withdrawals that segregate public lands from mineral entry and location, and from appropriation under the land laws (unless prohibited).	Same as Alternative B.	Same as Alternative B.	Same as Alternative B.
WATER POWER AND STORAGE RESERVOIR SITES	Inventoried and potential sites managed to consider future water power purposes unless higher priority resources/resource uses are implemented. Lands withdrawn for these purposes would be managed for potential water power and storage purposes.	Same as Alternative A, except management units B-1 through B-12 recommended to be closed to Water Power and Storage Reservoir sites. Before uses occur or facilities are developed that could be jeopardized by water power development on withdrawn lands for water power purposes, FERC would be consulted regarding withdrawal status and need for the withdrawal and site.	The Planning Area would be open to the location of water power and storage facilities. Inventoried and potential sites would be restrictively managed for these purposes. FERC would be contacted for withdrawal status and need before uses occur on water power withdrawals that would be jeopardized by water power development.	Same as Alternative A; Planning Area recommended to be closed to water power and storage reservoir sites.	Same as Alternative B, except management units E-1, E-3, E-10, E-14, and E-15 recommended to be closed to water power and storage reservoir sites.	Same as Alternative E, except management units would not be prefixed with the letter E.

AREAS OF CRITICAL ENVIRONMENTAL CONCERN

None proposed.

Public land totalling 207,944 acres designated and managed as ACECs; (Powderhorn, Alpine, Lake Fork, South Beaver Creek, West Antelope Creek, and East Gunnison ACECs); 4,625 acres designated as South Beaver Creek RNA/ACEC.

Public lands totalling 26,428 acres designated as ACECs; (Haystack Cave, Bighorn Sheep-A and B, Cebolla Creek, Slumgullion Slide, American Basin, Lake Fork, and Dillon Pinnacles ACECs); public lands totalling 15,512 acres would be designated RNA/ACECs: (South Beaver Creek and Redcloud Peak RNA/ACECs).

Public lands totalling 42,261 acres designated and managed as ACECs (units E-4 through E-9: American Basin, Redcloud Peak, Slumgullion Earthflow National Natural Landmark, West Antelope Creek, South Beaver Creek, and Dillon Pinnacles ACECs).

Public lands totalling 42,339 acres designated and managed as ACECs (units 4 through 9: American Basin, Redcloud Peak, Slumgullion Earthflow National Natural Landmark, West Antelope Creek, South Beaver Creek, and Dillon Pinnacles ACECs).

HAZARDS MANAGEMENT

Hazard sites/areas would be reviewed on a case-by-case basis. Management of other resources would involve reclamation of known hazard sites/areas. A hazard reclamation activity plan for known sites/areas would be developed. Activity plans would consider the reclamation of hazard sites.

Same as Alternative A.

Same as Alternative A.

Same as Alternative A.

Same as Alternative A.

Hazard sites or areas would be reviewed on a case-by-case basis and remedied to the degree necessary to protect public safety and health. Activity plans would consider the remediation of known hazards. Management of other resources would involve reclamation/remediation of known hazard sites.

BLM to continue cooperation and coordination with the Colorado Mined Land Reclamation Hazard abatement project.

The Bureau would continue to control trespass dumping on BLM lands through increasing public awareness, signing, and monitoring.

Coordination and cooperation with appropriate state or other agencies to remedy hazard sites would continue. Cooperation and coordination with Colorado Mined Land Reclamation Hazard abatement project would continue.

HAZARDOUS MATERIALS MANAGEMENT

Locations on public lands showing evidence of hazardous materials would be inventoried and examined on a case-by-case basis, and remedied to the degree necessary to protect public health, safety, and public or private property. Coordination and cooperation with appropriate state or other agencies to properly manage hazardous materials would continue. Trespass dumping and littering on public lands would be controlled through public awareness, signing, and monitoring.

Same as Alternative A.

CHAPTER TWO

INTRODUCTION AND CHANGES TO THE PREFERRED ALTERNATIVE

CHAPTER TWO

INTRODUCTION AND CHANGES TO THE PREFERRED ALTERNATIVE

INTRODUCTION

This document consists of the Proposed Resource Management Plan and Final Environmental Impact Statement (PRMP) for the Gunnison Resource Area. The Draft Gunnison Resource Management Plan and Environmental Impact Statement (DRMP) was published in March, 1991. This document is not a complete rewrite of the DRMP. It contains information on changes in proposals of the DRMP, corrections of any erroneous data, and in some cases, more recent data. The description of the proposed plan is in Chapter Four, and the environmental consequences of the proposed plan are described in Chapter Five of this document.

Any additional works cited in this document are listed in the References section. An updated Glossary is also included. Any tables and maps necessary to fully explain actions or information in the PRMP are included, and noted in the Tables and Maps section in the Table of Contents. A folded 1:100,000 scale map of the PRMP and Management Units is inserted into the document.

Acreage and analysis figures in this document were calculated using BLM's computerized Geographic Information System (GIS) unless noted. Acreage figures in this document are approximate.

PURPOSE AND NEED

The purpose of the PRMP is to update and integrate the BLM's land use planning for the area into a single, comprehensive land use plan providing the overall framework for managing and allocating public land resources in the Gunnison Planning Area for the next 10 to 12 years.

The approved Resource Management Plan (RMP) will meet BLM statutory requirement for a master land use plan as mandated by Section 202 of the *Federal Land Policy and Management Act (FLPMA)* of 1976 and the requirements of the *Wild and Scenic*

River Act (16 U.S.C. 1271). The approved RMP will update and supersede all land use planning in the American Flats/Silverton, and Gunnison Basin Management Framework Plans (MFPs).

In addition to identifying management direction within the planning area, the PRMP meets other specific objectives. It (1), identifies public lands to be designated as open, closed, or limited to off-highway vehicles (OHV) and, (2), analyzes the suitability of a segment of the Lake Fork of the Gunnison River for inclusion into the National Wild and Scenic Rivers System (NWSRS).

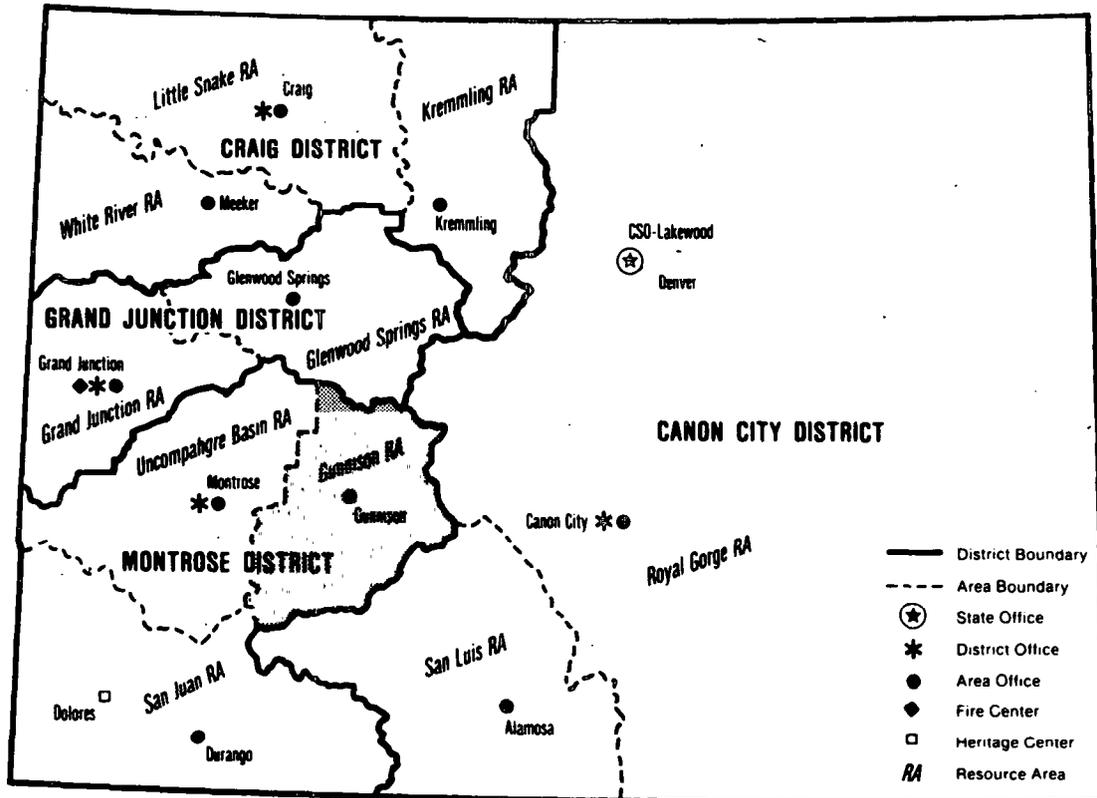
IMPLEMENTATION/MONITORING OF THE PLAN

Implementation of the RMP will begin when the Colorado BLM State Director signs the Record of Decision (ROD) for the RMP. This implementation will be accomplished as described in BLM Handbook H-1617-1.

During implementation of the RMP, additional documentation required to comply with the National Environmental Policy Act (NEPA) will be required, such as environmental assessments (EAs). The EAs can vary from a simple statement of conformance to the ROD, to complex documents that analyze several alternatives. An EA documents NEPA requirements for site-specific actions. Implementation of the RMP will be monitored, and the plan will be evaluated periodically. Revisions or amendments to the RMP may be necessary to accommodate changes in resource needs, policies, or regulations. Other decisions would be issued in order to fully implement the RMP.

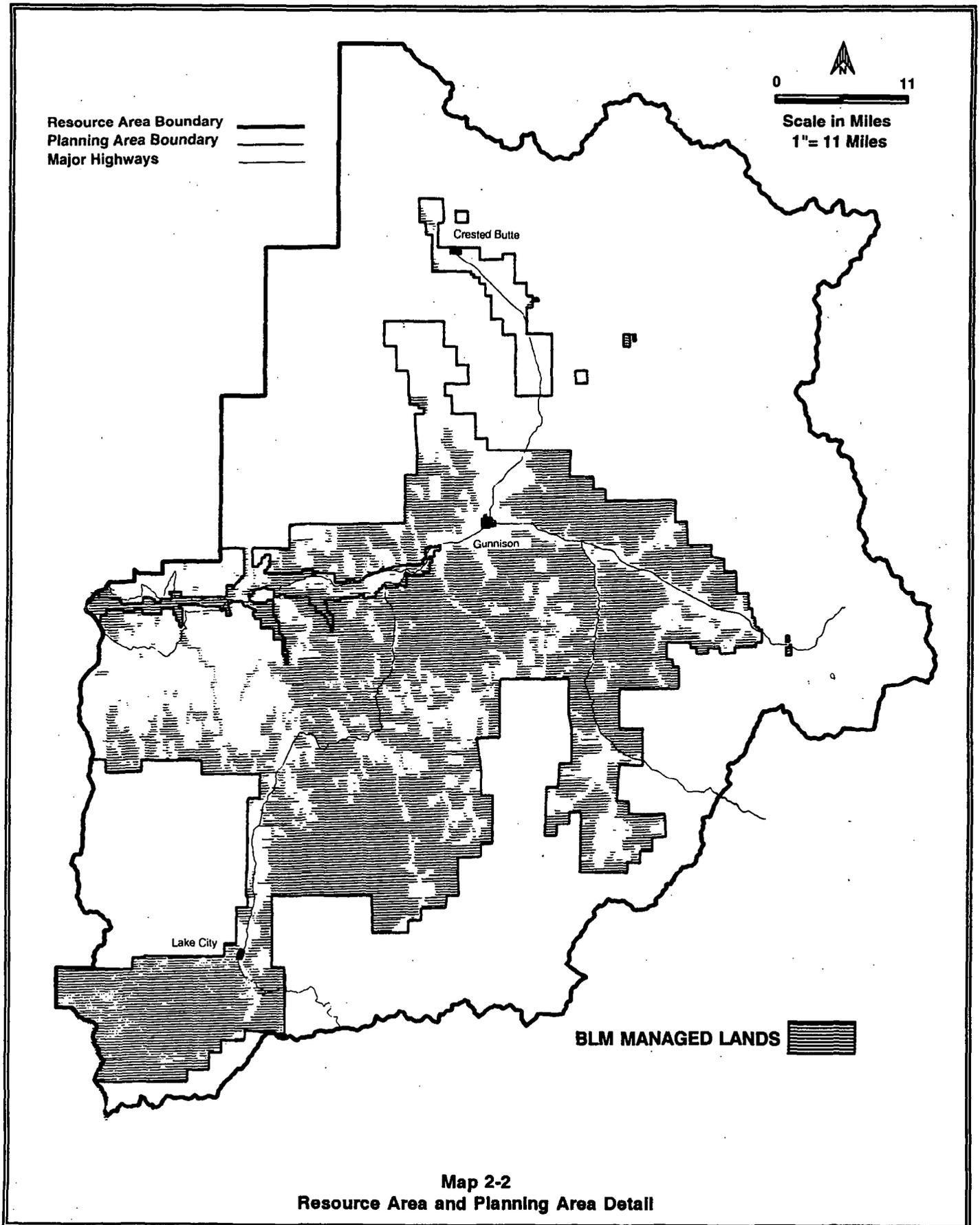
Refer to Appendix Q for a consolidated listing of activity plans that would be prepared during implementation of this PRMP. Where appropriate, integrated, multi-resource activity level plans would be encouraged and prepared, in lieu of individual resource activity level plans.

COLORADO



General Location of the Gunnison Resource Area

Map 2-1
General Location Map



Map 2-2
Resource Area and Planning Area Detail

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LOCATION OF PLANNING AREA AND LAND OWNERSHIP

The planning area (see maps 2-1 and 2-2) is within Hinsdale, Gunnison, Saguache, Montrose, and Ouray counties. The Gunnison and Uncompahgre National Forests and the BLM's San Juan Resource Area surround the planning area, except along the west-central boundary which is defined by the Cimarron River and the BLM's Uncompahgre Basin Resource Area boundary. Total acreage in the planning area

is about 960,730 acres; of this, about 61 percent (585,012 acres) is administered by the BLM, and about 37 percent (355,702 acres) is private land; about 20,015 acres are state administered. In addition, BLM has administrative responsibility for approximately 728,500 acres of federal mineral estate within the planning area, and 17,000 acres of mineral estate in the Gunnison Resource Area that are located outside of the planning area. Table 2-1 details surface and mineral ownership within the planning area by county.

Table 2-1

LAND STATUS IN THE PLANNING AREA IN ACRES OF SURFACE AND SUBSURFACE ESTATE BY COUNTY

	COUNTY					TOTAL
	Gunnison	Hinsdale	Saguache	Montrose	Ouray	
(1) SURFACE ESTATE						
FEDERAL LAND						
BLM ¹	355,350 ²	126,488	117,326 ³	3,660	2,188	585,012
STATE LAND						
CDOW ¹	10,985	1,703	195	6,122	0	19,006
SLB ¹	773	0	237	0	0	1,010
PRIVATE LAND ⁴	280,028	17,275	51,842	6,655	102	355,702
TOTAL SURFACE ACRES	627,136	145,466	169,601	16,237	2,290	960,730
(2) MINERAL ESTATE⁴						
FEDERAL MINERALS RESERVED:						
ALL MINERALS	449,866	125,319	135,017	6,777	2,187	719,166
COAL ONLY	3,680	0	0	0	0	3,680
OIL, GAS & COAL	0	0	0	0	0	0
OIL & GAS	1,010	0	0	0	0	1,010
OTHER	3,062	0	0	0	0	3,062
TOTAL MINERAL ESTATE	457,618	125,319	135,017	6,777	2,187	726,918

- 1 - BLM = Bureau of Land Management, CDOW = Colorado Division of Wildlife, SLB = Colorado State Land Board
- 2 - Includes 60 acres withdrawn to the United States Forest Service
- 3 - Includes 40 acres withdrawn to the United States Forest Service for an Administrative Site
- 4 - Approximately 160,000 acres of non-federal surface estate overlie federal mineral estate within the planning area. About 17,222 acres of non-federal surface estate overlie BLM-managed federal mineral estate within the remainder of the Gunnison Resource Area. The BLM does not administer the private surface overlying federal mineral estate except where federal laws are applicable.

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RELATIONSHIP OF THE PROPOSED RESOURCE MANAGEMENT PLAN TO THE 1980-1981 LIVESTOCK GRAZING ENVIRONMENTAL IMPACT STATEMENT AND MFP STEP III DECISIONS FOR LIVESTOCK GRAZING AND OTHER RESOURCES

The April, 1980, Draft and the September, 1980, Final Gunnison Basin Livestock Grazing Environmental Impact Statements (DGEIS and FGEIS) are documents that analyzed the environmental impacts of implementing five alternative livestock grazing management programs for the Planning Area. These are analytical, technical documents, and do not authorize any action to occur, or make any decisions regarding livestock grazing management. The decision document that does do this was incorporated into the June, 1981 document titled "Gunnison Basin and American Flats/Silverton Planning Areas Rangeland Program Summary" (ROD/RPS). This is the decision document that spells out what the State Director approved in 1981 regarding the livestock grazing management program and associated major decisions.

The purpose of the BLM's planning process is to update and integrate the land use planning for the Planning Area into a single, comprehensive, Resource Management Plan (RMP) that provides the overall framework for managing and allocating public land resources for the next 10 to 12 years. In some instances, the decisions that will result from this process may be different than those for livestock grazing management in the ROD/RPS, or MFP Step III decisions for other resources. Changes in information, policies, regulations, and conditions necessitate the updating of land use documents.

The PRMP does not provide a status report regarding progress in implementing general or specific types of range improvements authorized in the ROD/RPS, nor is a schedule included that shows, for the life of the plan, when specific or general types of improvements would be implemented. Instead the PRMP prescribes where improvements would be authorized, excluded, conditioned, or otherwise be managed.

Issues were not adequately resolved in the 1980 grazing EIS, due to unrealistic funding expectations. This PRMP is premised on the assumption that

recommendations would be practical, implementable, feasible, and achievable. The overall PRMP is clearly not as detailed and ambitious as the MFP decisions that resulted in 1980, but the decisions contemplated would resolve issues and make required allocations according to the objectives for the PRMP.

Livestock grazing on the BLM managed lands in the Planning Area would be managed according to Management Unit prescriptions and the Livestock Grazing Management section of Standard Management, Chapter Four, of this Proposed Resource Management Plan.

WILDERNESS STUDY PROCESS AND THE RMP/EIS

Within the Gunnison Planning Area there are six Wilderness Study Areas (WSAs) totalling approximately 114,427 acres: Powderhorn Instant Study Area, Redcloud Peak, Handies Peak, American Flats, Larson Creek, and Bill Hare Gulch WSAs.

The BLM study process has been completed for all the WSAs in the Planning Area. The Powderhorn Wilderness Final Environmental Impact Statement and Wilderness Suitability Report (1984) recommended 43,311 acres as being suitable for wilderness designation; the Gunnison Basin and the American Flats/Silverton Wilderness Final Environmental Impact Statement (1987) recommended 39,790 acres in three WSAs as being suitable for wilderness designation: Redcloud Peak, Handies Peak, and American Flats WSAs.

The Slumgullion Slide, Friends Creek, and Sparling Gulch WSAs were deleted from wilderness study and WSA status on March 12, 1990 because the adjacent Forest Service lands on which they relied for their wilderness values are no longer under consideration for wilderness. These areas are no longer subject to the Bureau's Interim Management Policy for Lands Under Wilderness Review.

Since the study process has been completed for all WSAs in the Planning Area, this PRMP does not re-analyze those areas, but does address, in various alternatives, management of lands within these WSAs in the event all, portions, or none of the WSAs are designated as wilderness by Congress during the life of this plan.

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In September, 1991, the Secretary of Interior submitted final recommendations for wilderness designation to the President. Because of mineral values and conflicts, no acres within the Redcloud and Handies Peak WSAs were recommended to the President for designation. These WSAs will remain WSAs until acted upon or released by Congress.

Until Congress acts on, and either designates or does not designate all or part of any WSA as wilderness, the WSAs in the Planning Area would be managed under BLM's Interim Management Policy for Lands Under Wilderness Review (IMP). If Congress designates public lands in any part of any WSA in the Planning Area as wilderness, those lands would be managed as wilderness and a wilderness management plan would be prepared for the area (s). If, during the life of this plan, Congress acts on and decides to not designate any part of any WSA in the Planning Area as wilderness, effectively removing it from WSA status, those public lands would be managed according to the alternatives in this PRMP.

TOPICS NOT ADDRESSED IN THE PRMP

Several topics identified during the preparation/scoping processes are not addressed in the PRMP, and are identified below, along with rationale for not addressing them.

Wilderness - See Wilderness Study Process and the PRMP section in this chapter.

Coal Planning - The unleased federal coal estate in the planning area, consisting of 2,982 acres under federal surface and 6,812 split-estate acres, would not be available for leasing without amendment to the approved resource management plan. The remaining federal mineral estate within the planning area has very little or no potential for the occurrence of coal resources. There has been no recent interest in the leasing of coal. A RMP amendment for coal leasing would be prepared after a coal lease application was filed by an individual or company interested in developing and mining the area. The amendment would consist of an identification of areas with potential for development, application of 20 criteria to identify those areas which are unsuitable for mining, an analysis of the tradeoffs necessary to protect other resources and uses that are unique or important, and consultation with effected surface

owners. The amendment would be accompanied by an environmental analysis of the impacts of the mining and development, including the social and economic impacts to local communities. The one existing coal lease in the planning area would be continued in all alternatives, and approximately 5,000 tons of coal annually would be produced from the lease.

Solid, Non-Energy Leasable Minerals - The federal mineral estate in the Gunnison Planning Area would not be available for the leasing of solid, non-energy leasable minerals, subject to valid existing rights, without amending the approved resource management plan (RMP). Available data indicates no known deposits of these minerals, and to determine at this time which lands would be open or closed to the leasing of these minerals would be premature. A RMP amendment would be prepared after an expression of interest in the leasing of these minerals is received from an individual or company interested in developing and mining solid, non-energy minerals.

The amendment would result in a decision that would identify the lands in the expression of interest that would be open or closed to the leasing of these minerals. The amendment would be accompanied by the appropriate environmental assessment of the impacts of the mining and development, including the social and economic impacts to the local communities, based on the best available data. The only known valid existing right in the Planning Area pertaining to these minerals is a Preference Right Lease Application (PRLA) involving 1,667 acres of public land for the purpose of developing a deposit of alunite (potassium aluminum sulfate) in sections, 17, 18, 19, and 20, Township 43 North, Range 4 West, N.M.P.M. The lands in the PRLA are situated in Hinsdale County approximately three miles south of Lake City, Colorado, in the vicinity of Red Mountain.

U.S. Forest Service and National Park Service Lands Overlying Federal Mineral Estate - The BLM will issue oil and gas leases within lands administered by the Department of Agriculture, U.S. Forest Service (USFS). The BLM only administers subsurface or down-hole activities occurring on oil and gas leases on USFS surface estate. Lands administered by the USFS will have leasing decisions made in a USFS Land and Resource Management Plan/EIS, or revision. The BLM is a cooperating

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agency providing oil and gas expertise to the team preparing these plans. BLM provides the USFS with projections of future oil and gas activity and impact analysis of subsurface construction. The USFS plans analyze impacts from oil and gas leasing and development to National Forest System Lands and describe where the USFS will or will not consent to lease.

The specific and cumulative impacts that would occur from potential leasing and development on National Forest Lands would be analyzed in the USFS plan.

Cumulative impacts on USFS lands within the Gunnison Resource Area from potential oil and gas leasing and development occurring on adjacent BLM-managed lands in the planning area would not occur, or would be insignificant.

The BLM is responsible for the leasing and development of lands administered by the National Park Service that are eligible for that purpose. The lands administered by the National Park Service (NPS) in the Curecanti National Recreation Area (NRA) are not contained within the Planning Area. These public lands have been withdrawn by the Bureau of Reclamation (BOR) and are administered by the NPS under a cooperative agreement between the BOR and NPS. As such, the lands are segregated from entry and location under the general mining laws, and since these lands are considered to be National Park System lands, mineral leasing is prohibited. The cumulative impact on these lands from potential oil and gas leasing and development within the adjacent planning area would be insignificant.

Split Estate Lands in The Gunnison Resource Area Located Outside The Planning Area - Split-estate lands in the Resource Area, that is, Federal mineral estate, under non-federal surface located outside the planning area boundary totalling 17,222 acres would be administered according to current laws, regulations, and policies. These lands are within the boundary of the Gunnison National Forest (USFS) and the BLM's Gunnison Resource Area, but are outside the planning area. This federal mineral estate will have leasing decisions made in the revision or update of the appropriate USFS Land and Resource Management Plan/EIS. The BLM also provides the USFS with oil and gas expertise for

these lands, including projections of future oil and gas activity, and impact analysis of subsurface construction. The USFS plan revision or update will analyze impacts on these split-estate lands from oil and gas leasing and development, and describe where leasing will or will not occur, and what mitigation would be specified as a result of specific impact analysis on these lands. The cumulative impacts on these lands from potential oil and gas leasing and activity occurring on adjacent BLM-managed lands in the Planning Area would be insignificant.

On-site inspection and consultation with the surface owner and operator may reveal that (1) the impacts addressed by the stipulation would be avoided or mitigated to an acceptable level, or (2) the resources of concern are not present. Upon either of these determinations by the BLM Authorized Officer, the stipulations could be applied, waived, modified, or excepted without public notice other than that provided for the APD. If, after on-site inspection and consultation with the non-federal surface landowner, it is determined by the Authorized Officer that conditions necessary to avoid impacts to non-federal resources would adversely impact the public resources addressed by these stipulations, the impacts would be assessed. If, based upon such assessment, the Authorized Officer makes a decision to substantially change or waive one or more stipulations, a 30-day public review period would be provided in addition to the public notice period for receipt of the APD (these two 30-day notice and review periods may overlap).

Impacts from leasing, exploration, and drilling on these split-estate lands are not expected to be significantly different than on similar federal surface overlying federal oil and gas estate.

WILD AND SCENIC RIVER STUDY ANALYSIS.

Appendix I, The Wild and Scenic River Study Analysis For The Lake Fork of the Gunnison River and Other Streams in The Planning Area provides the background information and eligibility, classification, and suitability or non-suitability analysis of streams and river segments in the Planning Area for potential inclusion into the National Wild and Scenic Rivers System. The study analysis is an update of Appendix I that was published in the DRMP.

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The 13.3 mile long Segment A of The Lake Fork of The Gunnison River was determined to be eligible for inclusion into the National Wild and Scenic Rivers System. Streams other than the Lake Fork of The Gunnison River in the planning area, in accordance with the Wild and Scenic Rivers Act, were examined by the team and analyzed to determine if the wild and scenic river eligibility criteria would be met. Some were determined to be free-flowing, but none were determined to possess outstandingly remarkable values. Please refer to Attachment B, Appendix I, in this document for a list of these other streams and which eligibility criteria were met or not met. As a consequence, none of the other streams in the Planning Area were studied further in the DRMP or PRMP.

OTHER AGENCY DOCUMENTS

To reduce or avoid conflicts between other agencies, the planning documents for adjoining lands have been reviewed and, where appropriate, that information has been used in the development of this PRMP. In addition, BLM land use plans for adjacent Resource Areas have also been reviewed and analyzed to avoid conflicts in land management. Please refer to the DRMP, page 1-12, Table 1-5, for a list of the documents referenced above.

CHANGES TO THE PREFERRED ALTERNATIVE

The PRMP is essentially the Preferred Alternative from the DRMP. Changes have been made, however, in response to public comments, to incorporate new information, to clarify management actions or impacts, or to correct information.

This section lists the changes made to the Preferred Alternative regarding actions within **STANDARD MANAGEMENT**, or actions within Management Unit prescriptions. The changes could affect the entire PRMP. Please refer to Appendix P for the comment letters and oral statements received on the DRMP. Appendix P also contains BLM responses to all comments.

Oil, Gas, and Geothermal Resources. All oil and gas stipulations have been revised, where needed, to be consistent with those in the Colorado Oil and Gas

Leasing and Development Final Environmental Impact Statement, January, 1991.

In Management Unit 1, leasing conditions at The Gate Campground (10 acres) and the Red Bridge Campground (5 acres) were changed from leasing permitted with no surface occupancy stipulations to leasing permitted with standard terms. This change was made based on internal review, considering the necessity for the stipulation. Standard terms permit BLM to move operations up to 200 meters, if necessary, in order to prevent surface disturbance at specific locations. This standard term would permit any proposed operations to be moved far enough from these two areas to sufficiently mitigate impacts.

Leasing conditions for the proposed Redcloud Peak and South Beaver Creek ACECs, Management Units 5 and 8 respectively, were changed from leasing permitted with no surface occupancy stipulations to leasing permitted with controlled surface use stipulations. These two units would be managed for the protection and enhancement of habitat and populations of Uncompahgre fritillary butterfly (unit 5) and skiff milkvetch (unit 8). Requirements of the stipulation are that inventories would be conducted prior to approval of operations in the units, and relocations of operation more than the 200 meters permitted in standard lease terms would be authorized in the units, in order to reduce the impacts of surface disturbance related to potential oil and gas development, and to prevent accidental loss or destruction of species or habitat. The changes were made based on internal review of the necessity of the stipulations, and considering that the standard lease terms and the requirements of the controlled surface use stipulations, combined with required compliance with the Threatened and Endangered Species Act, would provide the proper degree of mitigation and protection of species and habitat, without unduly restricting any potential oil and gas development. Standard lease terms authorize the BLM to also postpone operations for a 60-day period, if necessary, to ensure species can be adequately inventoried, for instance.

Leasing conditions for the proposed West Antelope Creek ACEC, Management Unit 7, were changed from leasing permitted with a seasonal stipulation on oil and gas operations being in effect from December 1 through March 31, in order to prevent disturbance

CHANGES TO THE PREFERRED ALTERNATIVE

to wintering big game, to leasing permitted with standard terms and conditions. The unit would be managed to improve the capabilities of the resources in the unit to support wintering elk, deer, and bighorn sheep. The change was made based on internal review of the necessity of the stipulation, and considering that standard lease terms and conditions would provide the degree of protection necessary for wintering big game in this large (46,922 total acres) unit. Standard lease terms authorize BLM to move proposed well pads or other facilities up to 200 meters, or to postpone operations up to 60 days if necessary to prevent disturbance to wintering big game. The BLM would, if necessary, negotiate with any operators to extend the distances and times authorized in the standard terms, in order to prevent disturbance to big game during critical periods or in areas of heavy concentrations of game.

The controlled surface use stipulation for Management Unit 14 (sage grouse brood rearing riparian areas) has been modified to restrict oil and gas operations to an area beyond all riparian vegetation, rather than to an area beyond 500 feet of the riparian vegetation. In the exception language, water quality, and other related resource values, have been added as factors to be considered.

Leasing conditions have been added to 122 acres in the existing BLM protective withdrawal C-041711 along three segments of Cebolla Creek in Management Unit 15. The unit would be managed to restore and enhance the condition of fishery streams. The federal oil and gas resources would be available for leasing with a controlled surface use stipulation being in effect that restricts potential oil and gas development to an area beyond all riparian vegetation in these segments, in order to prevent damage to or removal of this vegetation, important for fishery management.

Exact language of these stipulations can be found in Appendix K, along with maps giving the general location of the areas affected by the stipulations.

Wildlife Habitat Management. As a result of public comment and internal review, clarifications have been made in the STANDARD MANAGEMENT section for this component.

Language added clarifies that BLM would, 1) manage lands to help meet, within carrying capacities of the habitat, Colorado Division of Wildlife (CDOW) big game long range herd goals, 2) ensure that recommended actions involving wildlife habitat management would be determined after considering and evaluating potential effects on other lands, resources, or uses, and whether public land big game ranges could support increases in big game, 3) continue to participate in the Colorado Habitat Partnership Program (HPP), 4) ensure that proper use levels by wildlife on key plant species are not exceeded, 5) recommend temporary decreases in wildlife numbers if necessary, in order to achieve proper use levels and better forage conditions on key wildlife plant species, 6) utilize new forage from wildlife treatments or projects to first satisfy watershed objectives before utilizing the forage for overall habitat objectives, 7), use the guidelines for management of sage grouse habitat in Appendix A (which has been reorganized) whenever possible in the design of land or vegetation treatment projects to offset the impacts to sage grouse, and grouse habitat, from these projects, and 8), provide habitat to support 12,000 sage grouse planning area-wide, rather than to provide habitat for a potential harvest of 1,000 grouse.

Changes have been made to the STANDARD MANAGEMENT section for this component, also based on public comment and review.

Sage Grouse and Other Upland Game Bird Habitat. A proviso has been added in STANDARD MANAGEMENT whereby the April 1 through May 31 period restricting discretionary actions could be lengthened or shortened, depending on whether sage grouse are present and using the habitat.

Releases of Columbian sharp-tailed grouse and Merriams' turkey could be authorized by the District Manager following inventory for suitable areas, a release or reintroduction plan, and environmental documentation.

A change has been made in Management Unit 2, the Powderhorn Primitive Area SRMA, regarding the introduction of moose. In addition to evaluation and approval of an introduction plan and an environmental analysis document, introduction(s)

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would only occur if the area was rejected by Congress for wilderness designation.

See the changes discussed under **Oil, Gas, and Geothermal Management** above for changes made in oil and gas leasing conditions for Management Unit 7, West Antelope Creek proposed ACEC, a unit that would be managed to improve the capabilities of the resources in the unit to support wintering elk, deer, and bighorn sheep.

A change was made, based on public comments, in Management Unit 11 regarding the implementation of land or vegetation treatments and other projects. These activities would be permitted, subject to the conditions in unit 11, and deviations from sage grouse habitat management guidelines in Appendix A would be permitted, if it can be demonstrated that short term impacts would be offset by long term benefits to sage grouse and their habitat.

Please refer to the changes discussed under **Livestock Grazing Management** below for information regarding seasonal minimum stubble heights required in Management Unit 14 for, among other values, protection of sage grouse and brood rearing habitat during critical periods.

Fishery Resources (Aquatic Habitat). Regarding Management Unit 15, please refer to the discussion of the addition of an oil and gas stipulation for 122 acres along Cebolla Creek under **Oil, Gas, and Geothermal Management** above, for a change from the Preferred Alternative regarding this component.

Livestock Grazing Management. As a result of public comments and internal review, this section under **STANDARD MANAGEMENT** in Chapter Four of this document has been extensively rewritten. The majority of the changes were made to clarify recommended actions contained in the Preferred Alternative, or were made after considering implementation of actions. Changes were made in stubble heights and their implementation, % of forage utilization, and range readiness application. Clarification was added to better explain forage allocation methods. Several standard operating procedures of the livestock management program were included as a means to explain how elements, such as range improvements, monitoring, and activity plans (AMPs or CRMAs) would be prepared. In addition, several related management actions have been changed or further clarified in various Management Units as a response to public comments.

Table 2-2 below simplifies the process of comparing changes to the **STANDARD MANAGEMENT** sections of this component in the PRMP and the Preferred Alternative. Excerpts from Table 1-1, Chapter One, a table that compares actions recommended in the PRMP with all alternatives addressed in the DRMP, are included in Table 2-2 below. As a convenience, only those entries that were changed or extensively clarified are included. Please refer to the Standard Management sections in the DRMP and the PRMP for a detailed comparison.

CHANGES TO THE PREFERRED ALTERNATIVE

Table 2-2

COMPARISON OF LIVESTOCK GRAZING MANAGEMENT CHANGES IN THE PRMP AND THE PREFERRED ALTERNATIVE

ALTERNATIVE E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
<p>About 470,828 suitable acres would be available for grazing in existing allotments, and about 46,526 AUMs would be available for allocation. About 6,757 suitable acres would not be available for grazing, in addition to suitable unavailable acres in Alternative A.</p>	<p>About 470,460 acres of suitable public lands would be available for livestock grazing and about 46,904 AUMs would be available for allocation. Public lands unsuitable or unavailable for livestock grazing would continue to be excluded from livestock grazing unless monitoring or other data indicate that the areas may be grazed.</p>
<p>Existing categorization on all Allotments would continue. Livestock management to be generally as per 1987 RPS and updates. Some Management Unit prescriptions modify existing allocations to resolve resource conflicts. Livestock allocations could be modified further if studies or data indicate changes are necessary. Implement a total forage utilization level of 40-60% on all uplands; 4" minimum stubble heights in riparian zones units E-14 and E-15 and about 34 miles of riparian zones in units E-2 and E-13; 2-1/2" minimum stubble heights in all other riparian zones.</p>	<p>Allotment categorization would be re-examined as needed based upon a change in categorization factors identified from monitoring data or other management and resource information. Categorization and management of "M" and "C" allotments in 1987 RPS would continue unless monitoring data and/or other resource information indicates adjustments are necessary. Some Management Unit prescriptions modify existing allocations to resolve resource conflicts. On category "I" allotments, existing management or forage allocation levels would be adjusted to achieve or maintain desired plant communities and to help meet the following resource needs:</p>
	<p>1. <u>On uplands</u> - utilization of key forage species managed to allow for plant health or maintenance, watershed cover, and quality forage and wildlife cover. Maximum use on allotments without activity plans/agreements designed to achieve above goals would be 40-60% of current year's production during the period of use.</p>
	<p>2. <u>In riparian areas except in units 14 or 15</u> - utilization of key forage species limited to 40-60% current year's production, with 2-1/2" minimum stubble height during period of use. Utilization levels less than 40% may be prescribed in severely degraded riparian areas. Flexibility permitted for stubble height if management strategies defined in activity plans or grazing agreements would achieve riparian management objectives. See Livestock Grazing Management STANDARD MANAGEMENT in Chapter 4 for more detail.</p>
	<p>3. <u>In riparian areas in Management Unit 14</u> - a 4" minimum stubble height would be maintained from 6/15 through 7/31 for protection of sage grouse during brood rearing. A 2-1/2" minimum stubble would be required at all other times.</p>

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**Table 2-2
COMPARISON OF LIVESTOCK GRAZING MANAGEMENT CHANGES IN THE PRMP
AND THE PREFERRED ALTERNATIVE**

ALTERNATIVE E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
<p>New or additional available forage would be allocated or used to meet watershed objectives.</p>	<p>4. <u>In riparian areas in Management Unit 15</u> - a 4" minimum stubble height would be required.</p> <p>Minimum stubble requirement would be flexible in areas covered by activity plans or grazing agreements that would achieve unit 14 or 15 management goals. A 4" minimum stubble height may not be achievable in some riparian areas within the first two or three years. See Livestock Grazing Management in STANDARD MANAGEMENT, Chapter 4 for more detail. Riparian concerns would be addressed utilizing above guidance as needed when revising or preparing new activity plans. Guidance above would be incorporated into all existing activity plans.</p> <p>Additional forage available for livestock as a result of range improvements or treatments would be allocated according to 43CFR 4100, with consideration given to meeting the basic soil and watershed needs as defined in the Montrose District Soil Erosion Monitoring Guidelines. Additional forage would be considered in reactivating suspending use or as a means to avoid suspending active use.</p>
<p>Range readiness would be implemented on all allotments.</p>	<p>Range readiness criteria would be considered when requests for livestock turn-out dates are earlier than dates specified on permits or when vegetation growing conditions are affected by drought or other natural or man-caused influences, such as, fire. Range readiness would be incorporated into existing AMPs utilizing criteria in Appendix B. Range readiness criteria in Appendix B would be used until specific criteria can be written into each AMP or other activity plan.</p>
<p>AMPs or CRMAs would be revised or developed at the rate of about 1-2 plans annually.</p>	<p>Existing activity plans (AMPs, CRMAs, etc.) would, based on available staffing, be evaluated and, if necessary, either modified or revised using a coordinated interdisciplinary approach. New activity plans would also be developed with interdisciplinary input and consultation with permittees and other affected interests.</p>
<p>Existing livestock facilities would be maintained, and new range facilities and treatments developed according to AMPs or CRMAs.</p>	<p>Range improvements such as fences, water developments, burns, spray treatments, and others would continue to be identified and prescribed in activity plans or agreements. Any range improvements identified in the MFP ROD that were not implemented, and would enhance or facilitate resource management objectives would be considered for development. Existing range improvements would continue to be maintained as assigned in cooperative agreements and range improvement permits.</p>

CHANGES TO THE PREFERRED ALTERNATIVE

Livestock grazing changes in Management Units are listed below by the unit numbers.

1, 5, 7, and 10 - Based on public comments, livestock grazing is mentioned as a significant use occurring in these units.

2 - The requirement to maintain a 4" minimum stubble height at all times along the entire length of four fishery streams in this unit in the DRMP Preferred Alternative was changed, based on internal review. The 4" is required along only a total of approximately 29 miles of these riparian areas, and only during the grazing period of use. Refer to STANDARD MANAGEMENT for information regarding the implementation of stubble heights.

4 - The elimination of livestock grazing in this unit in the DRMP Preferred Alternative was changed, based on public comment and internal review, to permit grazing in a manner such that conflicts between livestock and recreationists are avoided, especially during the wildflower display season.

7 - Based on internal review and public comment, the elimination of grazing along North Willow Creek in the Preferred Alternative has been changed in the PRMP to permit grazing when the riparian area has recovered sufficiently, and grazing systems would include measures to facilitate the continued improvement of the riparian conditions and resources. The importance of lands in this unit for spring grazing is mentioned in the unit description.

11 - As a result of public comments, language is included in the PRMP clarifying that new available forage from range improvements or treatments would be allocated for livestock management needs, after considering basic watershed needs.

12 - Based on public comments, language is included that clarifies that compatible range improvements or treatments are permitted in the unit.

13 - Based on internal review, the Pauline Creek fishery riparian area that was discussed separately in the DRMP Preferred Alternative in this unit (13) was moved into unit 15, and is considered in that unit discussion. Management of the stubble along that

stream is not discussed separately, and is included along with the general stubble discussion for unit 15. The 1/4 mile segment of Los Pinos Creek that was discussed separately in unit E-15 in the DRMP Preferred Alternative has been moved into this unit (13) in the PRMP, and is also discussed separately. Based on internal review and public comment, the elimination of grazing along this segment in the Preferred Alternative has been changed in the PRMP to permit grazing when the riparian area has recovered sufficiently.

14 - The minimum 4" stubble height in this unit was changed from being required during the grazing period of use to being required from June 15 through September 15, in order to more closely correspond to the most critical period when 4" would be crucial for providing cover for young sage grouse. Also, a minimum 2 1/2" stubble height would be required at all other times. Refer to STANDARD MANAGEMENT for flexibility to minimum stubble heights.

15 - Based on internal review, the PRMP clarifies that the requirement to achieve and maintain a 4" minimum stubble height in this unit includes the grazing period of use. Los Pinos Creek is now discussed in unit 13, since that 1/4 mile segment was deleted from unit 15. The 1/4 mile segment of the Tomichi Creek was deleted from unit 15, and is discussed in the prescription for unit 11. The elimination of livestock grazing along 1/4 mile of the Tomichi Creek riparian zone in the DRMP Preferred Alternative was changed to permit grazing, under conditions of an agreement (regarding a grazing strategy) that was reached with BLM and the permittee ensuring that riparian management objectives would be achieved. Grazing along Tomichi Creek is thus not specifically mentioned in the prescription for unit 11.

16 - Language has been added to this unit to clarify that range improvements or treatments would not be permitted within the 320 acre section along Wildcat Creek where grazing would continue not to be authorized, and that otherwise compatible treatments would be permitted according to STANDARD MANAGEMENT.

CHAPTER TWO

Recreation Management. Based on internal review, in the PRMP no CRMAP for the Cochetopa Canyon Special Recreation Management Area would be prepared, as was called for in Standard Management for Alternative E (The Preferred Alternative). The recreation resources in the unit would continue to be managed according to the existing activity plan.

No recreation activity plan would be prepared for the Gunnison Extensive Recreation Management Area (ERMA), and Recreation Opportunity Spectrum (ROS) settings would not be determined, as was recommended in the DRMP. Recreation project plans would be developed for sites proposed for construction.

Disposal of Public Lands. Two tracts were added to the Category I Lands in STANDARD

MANAGEMENT. The tracts are about 70.97 and 533 acres in size, and are listed and described in Appendix D as Tracts 42 and 43, respectively. **Withdrawals and Classifications.** Based on internal review, this section in Standard Management was extensively rewritten and reorganized, and now contains a summary of recommendations for all the various categories of withdrawals and classifications, including reserves.

Hazardous Materials Management, Hazards Management. Based on internal review, these sections were added to Standard Management in the PRMP, in order to respond to the need to consider remediation and other actions when confronted with hazard sites/areas and hazardous or toxic materials on public lands.

CHAPTER THREE
CHANGES TO THE TEXT OF THE DRAFT RMP/EIS

CHAPTER THREE

CHANGES TO THE TEXT OF THE DRAFT RMP/EIS

Changes have been made to the text of various chapters and sections of the Draft Gunnison Resource Management Plan and Environmental Impact Statement (DRMP). These changes have been made in response to public comments and internal review, to incorporate new information, to clarify management actions or impacts, or to correct information. Table 3-1 in this chapter is a list of these changes. Map 3-1 in this chapter shows

additional pronghorn antelope habitat that was erroneously left off Map A-3 in Appendix A, the wildlife management appendix, of the DRMP.

Changes that affect the Preferred Alternative (Alternative E) in the DRMP have been incorporated into the text of the Proposed Resource Management Plan and Final Environmental Impact Statement (PRMP), where appropriate.

Table 3-1

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
Page S-2; Table S-1; OIL, GAS, AND GEOTHERMAL RESOURCES.	**Change the following acre numbers as a result of incorrect calculations: under Alternative A change "616,911" to 610,169 and "328,271" to 321,529; under Alternative B change "679,381" to 672,639 and "471,214" to 464,472; under Alternative C change "726,918" to 720,176; under Alternative D change "674,164" to 667,422 and "357,056" to 350,314; under Alternative E change "680,911" to 674,169 and "595,344" to 588,602.
Page S-5 and S-6: Table S-1; RIPARIAN ZONES; Alternative E.	Page S-5: **In the fourth paragraph, delete "about 56 miles of"; **Insert "(31 miles)" after E-11; **Insert "(25 miles)" after E-14. Page S-6: **Change "58 miles" to "57 miles".
Page S-8; Table S-1; WILDLIFE HABITAT MANAGEMENT.	**Alternative B: In the second paragraph in the column, change "permanent" to temporary, and "implemented" to recommended. Change the sixth paragraph in the column to read "Maintain or improve habitat on public land to support 500 pronghorn antelope, 500 bighorn sheep, 9,000 sage grouse, and for various non-game species, including raptors." **Alternative C: In the second paragraph in the column, change the second sentence to read "Maintain/improve habitat on public land to support 500 pronghorn antelope, 50 bighorn sheep, 6,000 sage grouse, and various non-game species."

CHAPTER THREE

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
Page S-8; Table S-1; WILDLIFE HABITAT MANAGEMENT. (Cont'd.)	<p>**Alternative D: Change the fourth paragraph in the column to read "Maintain or improve habitat on public land to support self-sustaining populations of bighorn sheep and pronghorn antelope, 9,000 sage grouse, and to support various non-game species."</p> <p>**Alternative E: second paragraph - change "permanent" to temporary, and "implemented" to recommended; change the third paragraph to read "Designate West Antelope ACEC (unit E-7, 28,215 acres), and manage to improve capability of habitat to support wintering elk, deer, and bighorn sheep. Land uses would be permitted that do not degrade elk and deer crucial winter range."; change the fifth paragraph to read "Maintain or improve habitat on public land to support 500 pronghorn, 500 bighorn sheep, and 9,000 sage grouse, and to support various non-game species, including raptors."</p>
Page S-9; Table S-1; WILDLIFE HABITAT MANAGEMENT; Alternative E.	<p>**Change the fourth paragraph in the column to read "Consider moose introduction in Powderhorn Primitive Area SRMA, if not designated as wilderness."</p>
Page S-11; Table S-1; LIVESTOCK GRAZING MANAGEMENT; Alternative E.	<p>**In the first paragraph, substitute "46,526 AUMs" for "46,501 AUMs". See also changes to pages 4-66 and 4-68.</p> <p>**In the fifth paragraph, substitute "34 miles" for "92 miles", and delete "E-1".</p>
Page S-12; Table S-1; LIVESTOCK GRAZING MANAGEMENT; Alternative E.	<p>**Change the second sentence of the first paragraph to read "Existing categorization for all allotments to continue."</p>
Page S-13; Table S-1; FOREST MANAGEMENT.	<p>**Alternative E: Insert "Backlog" at the beginning of the last sentence in the first paragraph; change the third paragraph to read "One FMP would be prepared for the Planning Area, incorporating existing FMPs".</p> <p>**All Alternatives: the text has been changed in the appropriate paragraphs to indicate that, on average, 300 Christmas trees would be possibly harvested annually.</p>
Page S-16; Table S-1; VISUAL RESOURCES; ALTERNATIVE D.	<p>**Following "VRM Class II -", change "341,598 acres" to 311,598 acres, as a result of a calculation error.</p>
Page S-19; ACQUISITION OF NON-FEDERAL LANDS; Alternative E.	<p>**Change the first paragraph to read "Managed as per...SRMA (E-2), selected private land...Pinnacles ACEC (E-9), and 270 acres of private lands in Dillon Pinnacles ACEC (E-9)." Delete the last paragraph, as it is included in the paragraph above.</p>
Page S-22; Table S-1; HAZARDS MANAGEMENT and HAZARDOUS MATERIALS MANAGEMENT; All Alternatives.	<p>**These two resources/resource uses have been added to the table in the PRMP (Table 1-1, Page 1-32) that is similar to the subject table in the DRMP. Please refer to Table 1-1, under the columns for Alternatives A-E for the text.</p>

CHANGES TO THE TEXT

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
Page 2-19; Table 2-12; SPECIAL STATUS ANIMALS; AFFECTED ENVIRONMENT.	**As the last entry, under the four columns in the table, add the following information. Column 1: boreal western toad; column 2: <i>Bufo boreas boreas</i> ; column 3: Category 2 species; column 4: Historical.
Page 2-19; SPECIAL STATUS PLANT AND ANIMAL SPECIES AND HABITAT; INVERTEBRATES; Right-hand column; AFFECTED ENVIRONMENT.	**Delete the last sentence in the paragraph and insert the following sentence: "On June 24, 1991, the species was listed as endangered by the U.S.F.&W.S."
Page 2-20; Table 2-13; SPECIAL STATUS PLANTS; AFFECTED ENVIRONMENT.	**Delete the information under the column headed COMMENTS , opposite Gunnison milkvetch, and substitute the following: "Most information is 20+ years old, indicates species commonly occurs; observations in 1989 and 1990 on public land.
Page 2-21; Table 2-14; SPECIAL STATUS PLANTS; AFFECTED ENVIRONMENT.	**Change the status of the Uncompahgre fritillary butterfly from "1" to "Endangered". Add an endnote "1" to the column header "STATUS".
Page 2-25; WILDLIFE HABITAT MANAGEMENT, ELK/DEER; first full paragraph; AFFECTED ENVIRONMENT.	**Change the first sentence in the paragraph to read: "Concerns in the Planning Area regarding elk and deer and their habitat are private land development within crucial winter ranges, the extent and distribution of palatable shrub browse species, vegetative/land treatments that remove winter browse, animal numbers versus habitat conditions in uplands and riparian areas, and disturbances and human activity during critical periods within crucial winter ranges.
Page 2-35; WILDERNESS STUDY AREAS; right-hand column; third paragraph; AFFECTED ENVIRONMENT.	**Insert the following sentence immediately before the last sentence in the paragraph: In October, 1991, the Secretary of Interior submitted final recommendations for wilderness designation to the President. Because of mineral values and conflicts, no acres within the Redcloud and Handies Peak WSAs were recommended to the President. These WSAs will remain as WSAs until acted upon or released by Congress.
Page 2-38; HISTORICAL RESOURCES; Table 2-29; Footnote 2 at bottom of table; AFFECTED ENVIRONMENT.	**Change this footnote to read: "2. Interpretation by Curecanti National Recreation Area (NPS) under Cooperative Agreement".
Page 3-9; STANDARD MANAGEMENT; Forest Management; first paragraph; Alternative A	**Change the second sentence in the paragraph to read "Approximately 44,062 acres of suitable commercial forest lands and 19,262 acres of suitable woodlands would be available for harvest, resulting in a possible annual harvest of 1,200 MBF of commercial timber, 400 cords of fuelwood, 400 wildings, and, on average, 300 Christmas trees."

CHAPTER THREE

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
<p>Page 3-12; STANDARD MANAGEMENT; Transportation and Access; Table 3-2; EASEMENT PRIORITIES; Entry no. 4, Alpine Gulch; Alternative A.</p>	<p>**Within the parens following "Alpine Gulch", under the column GENERAL LOCATION, insert "and horse" between the words "foot" and "access".</p> <p>**Under the column BENEFITTING ... USES, insert ",grazing management" after the "Recreation management" entry pertaining to Alpine Gulch.</p>
<p>Page 3-14; STANDARD MANAGEMENT; Add Hazardous Materials Management; Alternative A.</p>	<p>**Add the following paragraph immediately before the paragraph headed "Law Enforcement":</p> <p>Hazardous Materials Management. Locations on public lands showing evidence of hazardous materials would be inventoried and examined on a case-by-case basis, and remedied to the degree necessary to protect public health, safety, and public or private property. Coordination and cooperation with appropriate state or other agencies to properly manage hazardous materials would continue. Trespass dumping and littering on public lands would be controlled through public awareness, signing, and monitoring.</p>
<p>Page 3-18; STANDARD MANAGEMENT; Wildlife Habitat Management; Terrestrial Wildlife and Habitat; Sage Grouse Habitat; Alternative B.</p>	<p>**Change the second sentence in the paragraph to read "Sagebrush and riparian vegetation on public land would be managed to support approximately 9,000 sage grouse."</p>
<p>Page 3-19; STANDARD MANAGEMENT; Forest Management; first paragraph, right-hand column; Alternative B.</p>	<p>**Insert the following paragraph between the first and second paragraphs: "Approximately 39,442 acres of suitable commercial forest lands and 24,405 acres of suitable woodlands would be available for harvest, resulting in a possible annual harvest of 1,180 MBF of commercial timber, 505 cords of fuelwood; 250 acres of reforestation completed annually. Other forest products (400 wildings, and, on average, 300 Christmas trees) would be harvested or would possibly be available.</p>
<p>Page 3-22; STANDARD MANAGEMENT; Add Hazardous Material Management; Alternative B.</p>	<p>**Add the following paragraph immediately before the paragraph headed "Law Enforcement":</p> <p>Hazardous Materials Management. Locations on public lands showing evidence of hazardous materials would be inventoried and examined on a case-by-case basis, and remedied to the degree necessary to protect public health, safety, and public or private property. Coordination and cooperation with appropriate state or other agencies to properly manage hazardous materials would continue. Trespass dumping and littering on public lands would be controlled through public awareness, signing, and monitoring.</p>
<p>Page 3-27; MANAGEMENT UNIT B-2; Transportation and Access; Alternative B.</p>	<p>**Change the text to read: "Public hiking and horse access would be acquired into the Alpine Gulch drainage for recreation and livestock grazing management."</p>

CHANGES TO THE TEXT

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
<p>Page 3-51; STANDARD MANAGEMENT; Wildlife Habitat Management; Terrestrial Wildlife and Habitat; Sage Grouse Habitat; Alternative C.</p>	<p>**Change the second sentence in the paragraph to read "Sagebrush and riparian vegetation on public land would be managed to support approximately 6,000 sage grouse."</p>
<p>Page 3-52; STANDARD MANAGEMENT; Forest Management; Alternative C.</p>	<p>**Insert the following sentence between the first and second sentences: "Approximately 58,959 acres of suitable commercial forest lands and 19,262 acres of suitable woodlands would be available for harvest, resulting in a possible annual harvest of 1,770 MBF of commercial timber, approximately 400 cords of fuelwood, 400 wildings and, on average, 300 Christmas trees.</p>
<p>Page 3-54; STANDARD MANAGEMENT; Add Hazardous Materials Management; Alternative C.</p>	<p>**Add the following paragraph immediately before the paragraph headed "Law Enforcement": Hazardous Materials Management. Locations on public lands showing evidence of hazardous materials would be inventoried and examined on a case-by-case basis, and remedied to the degree necessary to protect public health, safety, and public or private property. Coordination and cooperation with appropriate state or other agencies to properly manage hazardous materials would continue. Trespass dumping and littering on public lands would be controlled through public awareness, signing, and monitoring.</p>
<p>Page 3-71; STANDARD MANAGEMENT; Wildlife Habitat Management; Terrestrial Wildlife and Habitat; Sage Grouse Habitat; Alternative D.</p>	<p>**Change the second sentence in the paragraph to read "Sagebrush and riparian vegetation on public land would be managed to support approximately 6,000 sage grouse."</p>
<p>Page 3-72; STANDARD MANAGEMENT; Forest Management; Alternative D.</p>	<p>**Insert the following sentence between the first and second sentences in the paragraph: "Approximately 34,679 acres of suitable commercial forest lands and 27,352 acres of suitable woodlands would be available for harvest resulting in a possible annual harvest of 1,040 MBF of commercial timber, 565 cords of fuelwood, 400 wildings, and, on average, 300 Christmas trees. 500 acres of reforestation would be accomplished in unit D-21.</p> <p>**Add the following two sentences to the end of the paragraph: "No commercial timber harvesting, other than that necessary in implementing other actions, would occur in riparian areas. Trees cut adjacent to riparian areas would be felled in a direction away from the riparian area, or in such a manner as to minimize riparian area disturbance".</p>

CHAPTER THREE

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
Page 3-75; STANDARD MANAGEMENT; Add Hazardous Materials Management; Alternative D.	**Add the following paragraph immediately before the paragraph headed "Law Enforcement": Hazardous Materials Management. Locations on public lands showing evidence of hazardous materials would be inventoried and examined on a case-by-case basis, and remedied to the degree necessary to protect public health, safety, and public or private property. Coordination and cooperation with appropriate state or other agencies to properly manage hazardous materials would continue. Trespass dumping and littering on public lands would be controlled through public awareness, signing, and monitoring.
Page 3-95; MANAGEMENT UNIT D-20; Transportation and Access; Alternative D.	**Change the text to read: "Public hiking and horse access would be acquired into the Alpine Gulch drainage for recreation management.
Page 3-103; STANDARD MANAGEMENT; Vegetation; Alternative E.	**In the third paragraph, substitute "2)" in place of the second number "1)".
Page 3-104; STANDARD MANAGEMENT; Wildlife Habitat Management; Terrestrial Wildlife and Habitat; Sage Grouse Habitat; Alternative E.	**Change the second sentence in the paragraph to read "Sagebrush and riparian vegetation on public land would be managed to support approximately 6,000 sage grouse."
Page 3-105; STANDARD MANAGEMENT; Livestock Grazing Management; Alternative E.	**Numbered paragraph 2: Change the first sentence to read: "With the exception of riparian zones along four streams in unit E-2, Pauline Creek in unit E-13, and all those in units E-14 and E-15, total forage utilization of key herbaceous forage species in the Planning Area would be limited to 40-60% of the current years' growth, with a 2-1/2 inch minimum stubble height maintained throughout the grazing season"; Add the following sentence at the end of the paragraph: "Refer to the prescriptions for Management Units E-2, E-13, E-14, and E-15 for recommended livestock grazing actions in those riparian areas".

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
<p>Page 3-106; STANDARD MANAGEMENT; Forest Management.</p>	<p>**Second paragraph: Add the word "Backlog" at the beginning of the fourth sentence. Change the second sentence to read "Approximately 41,347 acres of suitable commercial forest lands and 23,615 acres of suitable woodlands would be available for harvest, resulting in a possible annual harvest of 1,200 MBF of commercial timber, 490 cords of fuelwood, 400 wildings, and, on average, 300 Christmas trees". Change the last sentence to read: "A Planning Area-wide FMP would be completed that would incorporate and update the two existing FMPs". **Third paragraph: Delete the fourth sentence and substitute the following three sentences in the same place: "No commercial timber harvesting would occur in riparian areas, or in a 30-foot area either side of riparian areas, unless riparian or wildlife values would be improved. Logging decks or staging areas would not be permitted within riparian areas or in a 30-foot area either side of riparian areas. Trees cut adjacent to riparian areas would be felled in a direction away from the riparian area, or in such a manner as to minimize riparian area disturbance."</p>
<p>Page 3-109; STANDARD MANAGEMENT; Add Hazardous Materials Management; Alternative E.</p>	<p>**Add the following paragraph immediately before the paragraph headed "Law Enforcement": Hazardous Materials Management. Locations on public lands showing evidence of hazardous materials would be inventoried and examined on a case-by-case basis, and remedied to the degree necessary to protect public health, safety, and public or private property. Coordination and cooperation with appropriate state or other agencies to properly manage hazardous materials would continue. Trespass dumping and littering on public lands would be controlled through public awareness, signing, and monitoring.</p>
<p>Page 3-112; MANAGEMENT UNIT E-1; Transportation and Access; second sentence; Alternative E.</p>	<p>**Change the text to read: "Public hiking and horse access would be acquired into the Alpine Gulch drainage for recreation and livestock grazing management."</p>
<p>Page 3-112; MANAGEMENT UNIT E-1; Acquisition of Non-Federal Lands; First and second sentences; Alternative E.</p>	<p>**After the word "available" in both sentences, insert the word ... "selected"....</p>
<p>Page 3-113; MANAGEMENT UNIT E-2; Wildlife Habitat Management; First paragraph, second sentence; Alternative E.</p>	<p>**Change the sentence to read: "If the lands in the unit are considered or acted upon by Congress for wilderness designation, and are not designated, the unit would be evaluated and considered for moose introductions, which could be authorized by the District Manager following environmental analysis."</p>

CHAPTER THREE

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
<p>Page 3-114; MANAGEMENT UNIT E-2; Livestock Grazing Management; Alternative E.</p>	<p>**Delete the last sentence in the paragraph and substitute the following two sentences: "Livestock grazing along 2.2 miles of Fourth of July Creek, 10.2 miles of the East Fork of Powderhorn Creek, 8.3 miles of the Middle Fork of Powderhorn Creek, and 8.7 miles of the West Fork of Powderhorn Creek would be managed to maintain a 4" minimum stubble height for key forage species in these riparian zones containing important fisheries. This action is recommended in order to improve and maintain streams and streamside conditions, including soils and vegetation".</p>
<p>Page 3-118; MANAGEMENT UNIT E-7; right-hand column; first paragraph; Alternative E.</p>	<p>**Change the third sentence to read: "The area would be managed to improve the capabilities of the resources in the unit to support wintering elk, deer, and bighorn sheep."</p>
<p>Page 3-121; MANAGEMENT UNIT E-10; Right-hand column; Alternative E.</p>	<p>**Between the first and second full paragraphs insert the following new paragraph: "Federal mineral estate totalling 225 acres within BLM protective withdrawal C-014711 along parts of Cebolla Creek would continue to be withdrawn from mineral entry and location in order to protect riparian and recreation values from potential mining related disturbances".</p> <p>**Change the last sentence in the second full paragraph to read: "Disposal of mineral materials would not be permitted on 1,245 acres of federal mineral estate from April 15 through June 30 within elk-calving areas to prevent disturbance to calving elk, and on 225 acres yearlong within withdrawal C-014711 to protect recreation and riparian values along parts of Cebolla Creek from potential disturbances associated with mineral material disposal."</p>
<p>Page 3-123; MANAGEMENT UNIT E-12; Right-hand column, first paragraph; Alternative E.</p>	<p>**Delete the following sentence between semi-colons: "existing elk numbers being above CDOW long-range herd objectives in GMU 55". The CDOW has supplied data that indicates this is not a current concern in this area.</p>
<p>Page 3-124; MANAGEMENT UNIT E-12; Left-hand column, third paragraph, first sentence; Alternative E.</p>	<p>**Change the sentence to read: "To prevent disturbance to calving elk, seasonal stipulations on seismic and drilling activities would be in effect on approximately 235 acres of federal oil, gas, and geothermal estate under federal surface, from April 16 through June 30, within elk-calving areas in the unit."</p>
<p>Page 3-125; MANAGEMENT UNIT E-13; left-hand column, second full paragraph; Alternative E.</p>	<p>**Change the eighth sentence to read: "Livestock grazing in the riparian area along approximately 1.7 miles of public land bordering Pauline Creek would be managed to maintain a 4 inch minimum stubble height for key forage species in order to improve and maintain stream and streamside conditions, including soils and vegetation."</p>

CHANGES TO THE TEXT

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
Page 3-125; MANAGEMENT UNIT E-13 ; right-hand column, first full paragraph; Alternative E.	**At the end of the paragraph add the following sentence: "Mineral material disposal would not be authorized on these lands".
Page 3-126; MANAGEMENT UNIT E-14 ; Left-hand column; first one-sentence, complete paragraph; Alternative E.	**Change the one-sentence paragraph to read: "This unit consists of riparian areas containing important sage grouse brood rearing habitat along about 25 miles of public land."
Page 3-127; MANAGEMENT UNIT E-15 ; first one-sentence complete paragraph; Alternative E.	** Change the paragraph to read: "This unit consists of riparian areas containing important fishery streams along about 57 miles of public land."
Page 3-127; MANAGEMENT UNIT E-14 ; Livestock Grazing Management ; Alternative E.	**In the first sentence, insert "throughout" for the word "during".
Page 3-127; MANAGEMENT UNIT E-15 ; right-hand column; Alternative E.	**At the bottom of the column, insert the following new paragraph: "Federal mineral estate totalling 122 acres in BLM protective withdrawal C-014711 along parts of Cebolla Creek would continue to be withdrawn from mineral entry and location in order to protect riparian values from potential mining disturbances. Federal mineral estate totalling 445 acres in BLM protective withdrawal C-0125423 along the backcountry byway would also continue to be withdrawn from mineral entry and location in order to protect scenery along the byway from potential mining disturbances".
Page 3-128; MANAGEMENT UNIT E-15 ; Left-hand column, first and second paragraphs; Alternative E.	**Change the first and second paragraphs to read: "Federal oil, gas, and geothermal estate, totalling 567 acres under federal surface, would be open to leasing with a no surface occupancy stipulation within BLM protective withdrawals C-0125423 and C-014711 to protect scenery and riparian areas."
Page 3-128; MANAGEMENT UNIT E-15 ; Left-hand column, first and second paragraphs; Alternative E. (Cont'd.)	**"Federal oil, gas, and geothermal estate within elk calving areas, 247 acres under federal surface, would be open to leasing with a seasonal stipulation being in effect from April 16 through June 30 to prevent disturbance to calving elk. Seismic activities would be restricted during that same period. Variances to these stipulations may be granted (See Appendix K). Disposal of mineral materials on the federal mineral estate in these areas would not be permitted during those same times for the same reasons."

CHAPTER THREE

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
<p>Page 3-128; MANAGEMENT UNIT E-15; Alternative E.</p>	<p>Livestock Grazing Management: **In the second sentence, insert the phrase "...throughout the grazing season..." between the words "inches" and "would". **Add the following sentence at the end of the paragraph: Livestock grazing would continue to not be authorized along Henson Creek in order to maintain riparian, fishery, and scenic values.</p>
<p>Page 3-129; MANAGEMENT UNIT E-16; Left-hand column; Alternative E.</p>	<p>Withdrawals and Classifications: **Change the paragraph to read: The BLM protective withdrawals C-0125423 along the backcountry byway in the unit, about 445 acres, and C-014711 (122 acres) along parts of Cebolla Creek, would be continued, in order to protect riparian, fishery, and scenic values. **Add the following paragraph between the second and third paragraphs: "The federal mineral estate at the 60-acre Soap Creek and the 40-acre Old Agency F. S. administrative sites would continue to be withdrawn from mineral entry and location in order to prevent potential mining disturbances on these lands". **Third paragraph: change the third paragraph to read: "Federal oil and gas estate totalling 252 acres under federal surface within 1/4 mile radius of sage grouse lek sites would be open to leasing with a no surface occupancy stipulation to prevent disturbance to strutting sage grouse. The federal oil and gas estate at the 40-acre Old Agency and the 60-acre Soap Creek FS administrative sites would be open to leasing with no surface occupancy in order to protect these uses and facilities from disturbance. Federal oil and gas estate, 4,580 acres under federal surface and 4,885 acres of split estate within elk calving areas would be open to leasing with a seasonal stipulation on seismic and drilling activities being in effect from April 16 through June 30 to prevent disturbance to calving elk. Variances to these stipulations may be granted (see Appendix K). For these same reasons, disposal of mineral materials would not be permitted on 4,580 acres of federal mineral estate from April 16 through June 30 within elk-calving areas, and on the two FS administrative sites yearlong."</p>

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
<p>Page 4-29; IMPACTS ON SOIL AND WATER RESOURCES; Impacts From Oil, Gas, and Geothermal Management; Alternative C.</p>	<p>**Substitute the following language for the indicated paragraph: Impacts from Oil, Gas, and Geothermal Management. All the federal oil and gas estate in the Planning Area, 720,176 acres, is open to leasing in this alternative under standard terms and conditions. Oil and gas activities, such as road, drill pad, or utility construction, related to one or two wells could result in localized, site specific increased sediment yields from approximately 25 acres of surface disturbance. The potential for increased yields would be greatest from surface disturbances occurring on the projected 25 acres within the 487,388 acres of public lands containing soils with an erosion potential class of moderate or greater. Accidental fluid discharges, such as drilling fluids escaping during drilling operations, could contaminate surface waters and soils.</p>
<p>Page 4-30; CUMULATIVE IMPACTS ON SOILS AND WATER RESOURCES; Alternative C.</p>	<p>**Change the last sentence in the paragraph to read: "Sediment and erosion rates would be expected to increase as a result of all public lands being open to OHV use, and also as a result of no lands being closed to oil and gas leasing or being subject to oil and gas stipulations that would prevent related surface disturbances. On a Planning Area- wide basis the cumulative impacts from developing one or two wells would not be significant."</p>
<p>Page 4-31; IMPACTS ON SPECIAL PLANT...AND HABITAT; Impacts From Oil, Gas, and Geothermal Management; Alternative C.</p>	<p>**Substitute the following language for that in the indicated paragraph: Impacts from Oil, Gas, and Geothermal Management. Oil and gas drill pad, road, and utility construction within 720,176 acres that would be open to leasing, under standard terms and conditions, could potentially result in the accidental destruction of special status species or habitat, including known and potential habitat and populations of skiff milkvetch (a BLM sensitive species) and Uncompahgre fritillary butterfly populations and potential habitat (a USF&WS endangered species) in the South Beaver Creek and Redcloud Peak areas. The accidental destruction would potentially result from approximately 25 acres of surface disturbance related to developing one or two oil and gas wells.</p>
<p>Page 4-32; CUMULATIVE IMPACTS ON SPECIAL STATUS PLANT...AND HABITAT; Alternative C.</p>	<p>**Insert the following sentence at the end of the paragraph: "Because of fewer restrictions on surface disturbing activities, such as those from potential oil and gas activities, the potential risk of accidental destruction of known or potential populations or habitat of the Uncompahgre fritillary butterfly, skiff milkvetch, or other special status species or habitat, would be increased in this alternative."</p>

CHAPTER THREE

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
<p>Page 4-32; IMPACTS ON TERRESTRIAL WILDLIFE AND HABITAT; Alternative C.</p>	<p>**Add the following paragraph after the paragraph headed "Impacts From Locatable Minerals Management":</p> <p>Impacts From Oil, Gas, and Geothermal Management. No areas would be closed to leasing and no oil and gas stipulations would be in effect in this alternative. Localized or site specific impacts from surface or other disturbance related to developing one or two wells could be significant if activity occurred during critical periods necessary for reproduction or winter survival of big game species on elk calving areas (11,823 acres) or on crucial winter ranges (208,629 acres) overlying federal oil and gas estate. These impacts could be significant because elk calving areas are generally small in size and are selected by elk for particular characteristics. Also, much of the elk and deer crucial winter range in the Planning Area, including on important areas west of Gunnison and north of Blue Mesa Reservoir, occurs on fairly gentle terrain (sparsely vegetated, and dissected by narrow, shallow drainages) that results in long site distances and few sound barriers that could serve as buffers. Oil and gas activities could result in habitat removal, increased stress and excessive energy expenditure, increased mortality and birth losses, decreases in the survival of elk calves and other young, and a decrease in the improvement of the overall condition and health of these animals on these lands. Without stipulations, the stress from these activities could, where they occur, result in potentially reduced weights of big game species and their increased susceptibility to disease. Construction of roads, drill pads, and utilities, and increased road use and human activity would tend to repel or disturb big game species, and could potentially result in animals migrating onto poor habitat. Possible over-utilization of forage on other lands could also result.</p> <p>Similar, localized or site-specific impacts from surface or other oil and gas related disturbances from one or two wells could also be significant to bighorn sheep yearlong at specific locations within and along the narrow habitat areas in the Cebolla and Cochetopa Creek areas (15,407 acres). Disturbances from one or two wells in these areas could cause the animals to abandon the habitat for poorer habitat in other locations.</p> <p>If oil and gas related activity occurred at any of 27 lek sites or within 2,417 acres of riparian brood rearing habitat, sage grouse and grouse habitat would be potentially destroyed or displaced, or would be disturbed by surface or other disturbances at critical periods or locations in these finite habitat types.</p>

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
<p>Page 4-33; CUMULATIVE IMPACTS ON TERRESTRIAL WILDLIFE AND HABITAT; Alternative C.</p>	<p>**Add the following sentence, after the first sentence in the paragraph: "In the event that oil and gas related activities occur within the Planning Area, elk, deer, bighorn sheep and sage grouse would potentially be subject to habitat removal and stresses from related human and surface disturbances if the activities occur at important critical periods or locations. The cumulative impacts to elk and deer, on a Planning Area-wide basis, from one or two oil and gas wells would not be significant unless these activities occurred within elk-calving areas or in the important crucial winter ranges west of Gunnison and north of Blue Mesa Reservoir. These impacts could be significant in these areas because much of the elk and deer crucial winter range west of Gunnison and north of Blue Mesa Reservoir occurs on fairly gentle terrain (sparsely vegetated, and dissected by narrow, shallow drainages) that results in long site distances and few sound barriers that could serve as buffers. Oil and gas activities could result in habitat removal, increased stress and excessive energy expenditure, increased mortality, decreases in the survival of elk calves and other young, and a decrease in the improvement of the overall condition and health of these animals on these lands. Without stipulations, the stress from these activities could, where they occur, result in potentially reduced weights of big game species and their increased susceptibility to disease. Construction of roads, drill pads, and utilities, and increased road use and human activity would tend to repel or disturb big game species, and could potentially result in animals migrating onto poor habitat. Possible over-utilization of forage on other lands could also result."</p>
<p>Page 4-35; IMPACTS ON RECREATION MANAGEMENT; Alternative C.</p>	<p>**Insert the following paragraph after the paragraph headed "Impacts From Locatable Minerals Management": Impacts From Oil, Gas, and Geothermal Management. Oil and gas activities, as a result of developing one or two wells, could have a negative impact on recreation resources where road, drill pad, and utility construction occurs in three Special Recreation Management Areas (SRMAs), or on certain lands in the Gunnison Extensive Recreation Management Area (ERMA), including undeveloped recreation areas at the Hartman's Rock, Slate River, and High Mesa areas. The quality of the recreation experience would be lessened. These activities and facilities in semi-primitive non-motorized and primitive ROS settings could result in these lands being managed for less restrictive ROS settings. Visitation in these areas by those seeking solitude would decrease. Increased access to remote areas could increase OHV activity and cause additional surface disturbance. The quality of scenic viewing and hunting activities could be lessened as a result of these activities, in some locations.</p>

CHAPTER THREE

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
Page 4-36; CUMULATIVE IMPACTS ON RECREATION ; Alternative C.	**Change the last sentence in the paragraph to read: "The decrease in use would occur because of lowered scenic quality, altered ROS settings, displacement of wildlife, and losses of wildlife habitat and fisheries from a variety of land uses, including potential mining and oil and gas activity. The cumulative impact, on a Planning Area-wide basis, from developing one or two wells would not be significant unless activity occurred in close proximity to facilities used by recreationists."
Page 4-37; IMPACTS ON VISUAL RESOURCES ; Alternative C.	**Insert the following paragraph after the paragraph headed "Impacts From Locatable Minerals Management": Impacts From Oil, Gas, and Geothermal Management. Drill pad, road, or utility construction, where they would potentially occur, would alter landscape characteristics, reduce scenic quality, and could potentially result in long-term, site-specific, significant visual impacts that exceed allowable visual contrast, on a variety of landscape types in the Planning Area, especially in areas south and west of Lake City, that receive heavy motorized and non-motorized recreation use. These impacts would be more difficult to mitigate and would potentially be greatest if development occurred within lands with VRM Class I or II management objectives.
Page 4-38; CUMULATIVE IMPACTS ON VISUAL RESOURCES ; Alternative C.	**Add the following sentence to the end of the paragraph: Cumulative impacts to visual resources from one or two oil and gas wells would not be significant on a Planning Area-wide basis, unless the development were to occur in foreground or middleground landscapes with high quality scenery, usually defined as VRM class I or II lands.
Page 4-45; IMPACTS ON TERRESTRIAL WILDLIFE AND HABITAT ; Impacts From Wildlife Habitat Management ; Alternative D.	**Change the fourth paragraph in the left-hand column to read "By improving riparian and sagebrush vegetation on public land, habitat would be available to support approximately 9,000 sage grouse."
Page 4-56; IMPACTS ON SOILS AND WATER RESOURCES ; Right-hand column; Alternative E.	**In the paragraph headed "Impacts from Soil and Water Resources Management", change the second sentence in the second paragraph to read: " Securing instream flows, where appropriate, would protect existing fisheries".

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
<p>Page 4-56; IMPACTS ON SOILS AND WATER RESOURCES; Right-hand column; Alternative E. (Cont'd.)</p>	<p>**Substitute the following language for the sentences in the indicated paragraph. Impacts from Oil, Gas, and Geothermal Management. In the event that surface-disturbing oil and gas activities, related to developing one or two wells, such as road, drill pad, or utility construction, occur on 636,147 acres open to leasing with standard or seasonal stipulations, localized, site specific, increased sediment yields could result on these lands where these activities take place, as a result of approximately 25 acres of related soil disturbance. The potential for increased yields would be greatest on 487,388 acres of public lands containing soils with an erosion potential class greater than moderate. Accidental fluid discharges, such as produced water, during drilling operations, could contaminate surface waters and soils.</p> <p>Lease closures on 46,007 acres, no surface occupancy stipulations on 35,605 acres, and controlled surface use stipulations on 2,417 acres that would prohibit any oil and gas related surface disturbance would prevent these potential impacts from occurring on those lands.</p>
<p>Page 4-57; IMPACTS ON SOILS AND WATER RESOURCES; Right-hand column; Alternative E.</p>	<p>Impacts from Livestock Grazing Management: **In the first paragraph, right-hand column, change the sentence to read: "Managing 320 acres of public land in the Wildcat Creek drainage as unavailable for livestock grazing would help maintain and protect the quality of Crested Butte's municipal water supply."</p> <p>Impacts from Transportation and Access: **In the last sentence, delete the word "extraordinary".</p>
<p>Page 4-58; CUMULATIVE IMPACTS ON SOILS AND WATER RESOURCES; Alternative E.</p>	<p>**Add the following sentence to the end of the paragraph. "Oil and gas no surface occupancy and controlled surface use stipulations, and closing areas to leasing could prevent soil erosion and sedimentation. Cumulative impacts from one or two wells, on a Planning Area-wide basis, would not be significant."</p>
<p>Page 4-58; IMPACTS ON RIPARIAN ZONES; Right-hand column; Alternative E.</p>	<p>**Change the first sentence in the paragraph headed "Impacts from Soil and Water Resources Management" to read: "Vegetation treatments designed to increase plant basal cover and reduce accelerated soil erosion would enhance riparian areas by reducing the magnitude of flood waters and sediment delivery."</p>
<p>Page 4-59; IMPACTS ON SPECIAL PLANT AND ANIMALS SPECIES AND HABITAT; Impacts From Oil, Gas, and Geothermal Management; Alternative E.</p>	<p>**Change the indicated paragraph to read as follows: Impacts From Oil, Gas, and Geothermal Management. Oil and gas drill pad, road, and utility construction within 588,602 acres that would be open to leasing under standard terms and conditions, could potentially result in the accidental destruction of special status species or habitat. These species would be protected from accidental destruction from potential oil and gas related activities on 46,007 acres that would be closed to leasing, on 35,605 acres that would be subject to no surface occupancy stipulations (including known populations and potential habitat of skiff milkvetch and the Uncompahgre fritillary butterfly in two recommended ACECs), and on 2,417 acres subject to controlled surface use stipulations.</p>

CHAPTER THREE

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
Page 4-60; CUMULATIVE IMPACTS ON SPECIAL STATUS PLANT AND ANIMAL SPECIES AND HABITAT; Alternative E.	<p>**Delete the single paragraph and add these paragraphs: Restrictions on surface disturbance, including closing areas to oil and gas leasing, controlled surface use stipulations, and no surface occupancy oil and gas stipulations, special designations, limiting OHV traffic and implementing restrictions on livestock grazing and rights-of-way location would protect and enhance habitat for special status species and habitat and would help prevent accidental destruction or loss of these species and their habitat where they might occur in these areas.</p> <p>Oil and gas drill pad, road, and utility construction on lands that would be open to leasing under standard terms and conditions, could potentially result in the accidental destruction of special status species or habitat areas. The accidental destruction would potentially result from approximately 25 acres of surface disturbance related to developing one or two oil and gas wells."</p>
Page 4-61; IMPACTS ON TERRESTRIAL WILDLIFE AND HABITAT; Impacts From Wildlife Habitat Management; Left-hand column; Alternative E.	<p>**Change the second paragraph to read: "Land or vegetative treatments or projects that occur on 28,147 acres of pronghorn antelope habitat in unit E-11 would be designed to improve forb composition of sagebrush communities for sage grouse and pronghorn antelope."</p> <p>**Third paragraph: Change the second sentence to read: "By improving riparian and sagebrush vegetation on public land, habitat would be available to support approximately 9,000 sage grouse."</p>
TERRESTRIAL WILDLIFE AND HABITAT; Impacts From Oil, Gas, and Geothermal Management; Alternative E.12	<p>**Substitute the following paragraphs for the indicated paragraphs in the DRMP: Impacts from Oil, Gas, and Geothermal Management. In the event oil and gas activities occur, timing limitations on 13,068 acres of elk calving areas, and on 34,477 acres of big game crucial winter range in the proposed West Antelope Creek ACEC, would, during critical periods necessary for winter survival or successful reproduction of these species, prevent potentially significant, site-specific or localized impacts from surface or other disturbances related to developing one or two wells. Elk calving areas are generally small in size and are selected by elk for particular characteristics. The stipulations would also prevent stress and excessive energy expenditure, mortality and birth losses, ensure the survival of calves, and help maintain the overall condition and health of these animals on these lands.</p>

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
<p>TERRESTRIAL WILDLIFE AND HABITAT; Impacts From Oil, Gas, and Geothermal Management; Alternative E.12 (Cont'd.)</p>	<p>No surface occupancy stipulations would similarly protect bighorn sheep and their habitat on 15,407 acres along narrow, year-round habitat areas in the Cebolla and Cochetopa Creek areas (unit E-10) from potentially significant surface or other disturbances related to one or two wells.</p>
<p>Page 4-61; IMPACTS ON TERRESTRIAL WILDLIFE AND HABITAT; Impacts From Oil, Gas, and Geothermal Management; Alternative E. (Cont'd)</p>	<p>Sage grouse on 3,402 acres at lek sites would also be protected from similar disturbances by no surface occupancy stipulations. Approximately 2,417 acres of sage grouse brood rearing habitat in riparian areas in unit E-14 would be protected from potential surface and other oil and gas related disturbances by a controlled surface use stipulation.</p> <p>These controlled surface use, no surface occupancy stipulations, and one area being closed to leasing, would coincidentally, prevent similar oil and gas related disturbances from occurring on an additional 6,889 acres of crucial big game winter range.</p>
<p>Page 4-64; CUMULATIVE IMPACTS ON TERRESTRIAL WILDLIFE AND HABITAT; Second paragraph; Alternative E.</p>	<p>Big game and habitat on approximately 77 percent of the crucial big game winter range in the Planning Area on public lands containing federal oil and gas estate (136,034 acres) would be subject to potential surface and other related disturbances from one or two wells during critical periods. Much of the elk and deer crucial winter range in the Planning Area occurs on fairly gentle terrain (sparsely vegetated, and dissected by narrow, shallow drainages) that results in long site distances and few sound barriers that could serve as buffers. The stress from these surface and other disturbances could, where they occur on these lands, result in potentially reduced weights of big game species and their increased susceptibility to disease. Construction of roads, drill pads, and utilities, and increased road use and human activity would tend to repel big game species, creating disturbance, and potentially resulting in forage over-utilization on other lands.</p> <p>**Substitute the following sentences for the indicated paragraph: Sage grouse and their habitat, and big game, including elk, deer, and bighorn sheep would be protected seasonally and yearlong at critical locations and periods in some areas from oil and gas related disturbances. In the event that oil and gas related activities occur within the Planning Area, wildlife species on 77 percent of the crucial big game winter range would potentially be subject to stresses from related human and surface disturbances, if the activities occur at important critical periods or locations. Cumulative impacts on elk and deer within crucial winter ranges from one or two oil and gas wells would not be significant on a Planning Area-wide basis. Disturbances to species and habitat from discretionary human related disturbances would be reduced on most habitat types during critical periods. Timber harvest and management guidelines would help improve game and non-game wildlife and habitats.</p>

CHAPTER THREE

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
<p>Page 4-64; CUMULATIVE IMPACTS ON WILDLIFE HABITAT MANAGEMENT; Third paragraph.</p>	<p>**Change the last sentence in this paragraph to read "Habitat would be available on public lands to support approximately 9,000 sage grouse, 500 pronghorn antelope, and 500 bighorn sheep."</p>
<p>Page 4-66; IMPACTS ON LIVESTOCK GRAZING MANAGEMENT; Impacts from Riparian Zone Management; Alternative E.</p>	<p>**Left-hand column: Change the first sentence of the first paragraph to read: "Managing livestock utilization to maintain a 4" minimum stubble height for key herbaceous forage species on 2,350 suitable acres of riparian zones important for fisheries and sage grouse brood habitat in units E-2, E-14, and E-15, would reduce livestock allocations by about 235 AUMs on several allotments."</p> <p>**Right-hand column: Add the following sentence to the end of the first paragraph: "Continuing to not authorize livestock grazing on 7 miles of Henson Creek in unit E-15 and on 7 miles in unit E-1 would prevent potential damage to riparian, recreation, and scenic values."</p>
<p>Page 4-68; CUMULATIVE IMPACTS ON LIVESTOCK GRAZING MANAGEMENT; Left-hand column, Alternative E.</p>	<p>**In the first sentence, substitute "902" for "927", and "46,526" for "46,501." This text change is necessary because continuing to not authorize grazing along Henson Creek would not result in a potential reduction of 25 AUMs.</p>
<p>Page 4-69; IMPACTS ON RECREATION MANAGEMENT; Alternative E.</p>	<p>**Insert the following two paragraphs after the paragraph headed "Impacts From Locatable Minerals Management":</p> <p>Impacts From Oil, Gas, and Geothermal Management. Closing the Powderhorn Primitive Area SRMA to leasing, and implementing controlled surface use and no surface occupancy stipulations on oil and gas activities would, by prohibiting or restricting potential surface and other disturbances from one or two wells, protect important recreation lands and resources and prevent potential alteration of recreation settings and experiences from potential oil and gas related surface and other disturbances on a total of 84,029 acres of public lands in the Planning Area, including within all of the Powderhorn Primitive Area and Cochetopa Creek SRMAs, in parts of the Alpine Triangle SRMA and the ERMA, and in five recommended ACECs. These stipulations would also maintain hunting opportunities on these same lands as a result of these potential disturbances being restricted.</p>

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
<p>Page 4-69; IMPACTS ON RECREATION MANAGEMENT; Alternative E. (Cont'd.)</p>	<p>Surface and other disturbances related to developing one or two wells on the remainder of public lands in the Planning Area could have a negative impact on recreation where road, drill pad, and utility construction occurs in important recreation lands, such as in parts of the Alpine Triangle SRMA or the ERMA. The quality of the recreation experience would be lessened as a result of the surface disturbance and other associated disturbances. These activities and facilities in a variety of ROS settings could result in these lands being managed for less restrictive ROS settings. Visitation in these areas by those seeking solitude would decrease. Increased access to remote areas could increase OHV activity and cause additional surface disturbance. The quality of scenic viewing, especially south and west of Lake City, would be lessened in some locations on these lands as a result of these activities. Quality of hunting could be lessened by these activities resulting in displaced animals or increased mortality in site-specific situations.</p>
<p>Page 4-70; CUMULATIVE IMPACTS ON RECREATION MANAGEMENT; Alternative E.</p>	<p>**Change the first sentence to read: Improved recreation facilities and development of additional campgrounds would help provide for the estimated 40% increase in visitors to the Planning Area.</p>
<p>Page 4-70; CUMULATIVE IMPACTS ON RECREATION MANAGEMENT; Alternative E. (Cont'd)</p>	<p>**Insert these sentences after the second sentence in the paragraph: "No surface occupancy and controlled surface use stipulations, and a lease closure would protect valuable recreation lands and resources within portions of the Planning Area from potential surface and other disturbance, and would enhance hunting activities for some species, including within five recommended ACECs. The recreation resources on the remainder of the Planning Area, including hunting quality, could be altered as a result of oil and gas development. The cumulative impacts, on a Planning area-wide basis, would not be significant unless the development and related activities occurred within close proximity to recreation areas or other highly valued areas."</p>

CHAPTER THREE

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
Page 4-72; IMPACTS ON VISUAL RESOURCES ; Alternative E.	**Insert the following paragraph after the paragraph headed "Impacts From Locatable Minerals Management": Impacts From Oil, Gas, and Geothermal Management. Not leasing lands in a primitive area, and restricting leases with a controlled surface use stipulation, and with no surface occupancy stipulations within five ACECs, would protect high quality visual resources on 84,029 acres of public land. Drill pad, road, or utility construction, related to one or two wells, where they would potentially occur on the remainder of the Planning Area, could alter landscape characteristics, reduce scenic quality, and could potentially result in site-specific, long-term significant visual impacts that exceed allowable visual contrast, on a variety of landscape types in the Planning Area. These impacts would be more difficult to mitigate and would potentially be greatest if development occurred within lands with VRM Class I or II management objectives, especially south and west of Lake City.
Page 4-72; CUMULATIVE IMPACTS ON VISUAL RESOURCE MANAGEMENT ; Alternative E.	**Insert the following sentence at the end of the paragraph: Surface disturbance restrictions, including those regarding potential oil and gas activities, would protect high quality scenic values in portions of the Planning Area from a variety of land uses that could impact visual resources. Cumulative impacts to visual resources from one or two oil and gas wells would not be significant on a Planning Area-wide basis, unless the development were to occur in foreground or middleground landscapes with high quality scenery, usually defined as VRM class I or II lands.
Page 4-78; Table 4-1; IMPACTS ON LIVESTOCK GRAZING MANAGEMENT ; Alternative E.	**Substitute "902" for "927", and substitute "46,526" for "46,501".
Page 4-81; Table 4-1; IMPACTS ON VISUAL RESOURCES ; Alternative E.	**Within the parens immediately after "VRM IV lands", change "(-1,069 acres)" to "(-11,069 acres)".
Page F-10; APPENDIX F; RECREATION MANAGEMENT and WILDERNESS STUDY AREAS ; Map F-9; Off-Highway Vehicle Use, Limited Areas, Alternative E	**Delete the map reference number "11" at its current location on Colorado highway 149. The highway was erroneously listed on the map.
Page F-12; APPENDIX F; RECREATION MANAGEMENT and WILDERNESS STUDY AREAS ; Table F-1; DESIGNATED OFF-HIGHWAY VEHICLE ROUTES FOR ALTERNATIVE E (PREFERRED ALTERNATIVE)	**Delete entry number "11" and the corresponding text. The highway was erroneously listed on the map.

CHANGES TO THE TEXT

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
<p>Pages F-16 through F-9; APPENDIX F; RECREATION MANAGEMENT and WILDERNESS STUDY AREAS; Tables F-2 through F-6; APPROXIMATE BLM WILDERNESS STUDY AREA AND RECOMMENDED WILDERNESS AREA ACRES IN VARIOUS ALTERNATIVES.</p>	<p>**Under the subheadings "WSA/RWA", under all entries for RED CLOUD PEAK and HANDIES PEAK WSAs, in all these tables, change the indicated acres figure on the right side of the slash mark to "0", to reflect the Secretary of Interior's October, 1991, recommendation to the President.</p>
<p>Page G-1; APPENDIX G; FORESTRY.</p>	<p>**Delete the entry "Requirement to plant trees."</p>
<p>Page H-6; APPENDIX H; AREAS OF CRITICAL ENVIRONMENTAL CONCERN; Table H-2; POTENTIAL AREAS OF CRITICAL ENVIRONMENTAL CONCERN.</p>	<p>**Several omissions were noted in this table. The table has been updated and reprinted in the Appendix H of this document.</p>
<p>Page I-10; APPENDIX I; LAKE FORK OF THE GUNNISON WILD AND SCENIC RIVER STUDY REPORT; Suitability Determination; 1. Characteristics that do or do not make the area a worthy addition to the National Wild and Scenic Rivers System.</p>	<p>**Change the two paragraphs to read as follows.</p> <p>The outstandingly remarkable characteristic that qualifies this river segment as being eligible for inclusion is the superb scenery in this high mountain valley. The scenery is outstanding in the river corridor. Recreation use is moderate to heavy in the river corridor, but very little use is focused on the river itself. There is no recreational boating and no significant fishery resource associated with this segment.</p> <p>The scenic values in this segment would continue to be well protected with the existing management authorities explained under suitability determination factor number 6. Therefore, this segment would not make a worthy addition to the National Wild and Scenic Rivers System.</p>

CHAPTER THREE

Table 3-1 (Cont'd.)

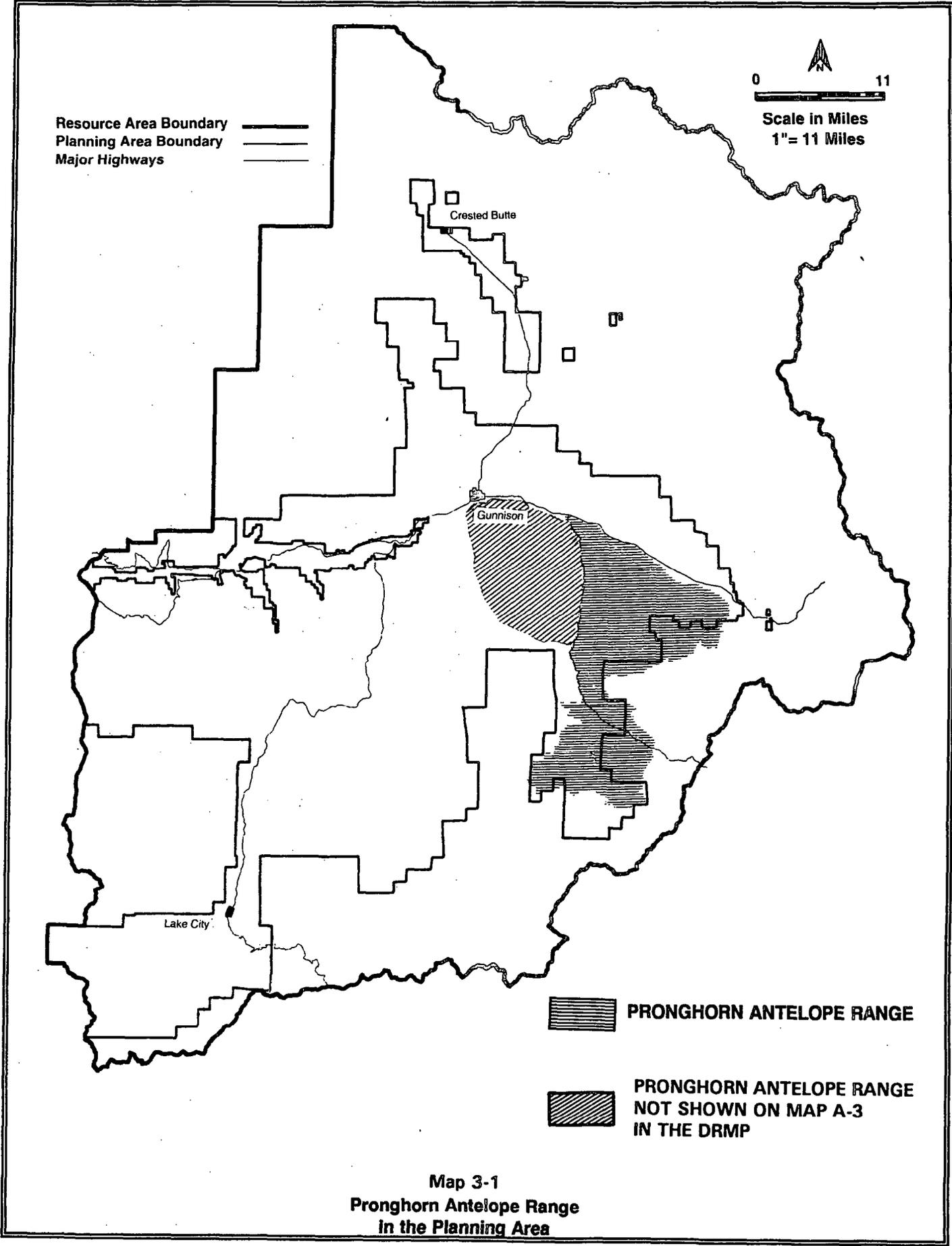
CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
<p>Page I-12; APPENDIX I; LAKE FORK OF THE GUNNISON WILD AND SCENIC RIVER STUDY REPORT; Suitability Determination; 6. Ability of the agency to manage the river area or segment as a Wild and Scenic River.</p>	<p>**Change the two paragraphs to read as follows. Because of the current attention paid to recreation management in this general area, it would be relatively simple for the BLM to incorporate considerations to maintain or protect values within current management. These values are recognized and partly protected in other ways such as the "Loop Road" scenic withdrawal (C-0125423, 330 acres in Segment A), the Alpine Loop National Backcountry Byway (11.05 miles in Segment A), WSA interim management policy for Redcloud and Handies Peak WSA's, and the Alpine Triangle Special Recreation Management Area. The PRMP recognizes and manages for the recreation values in this area and focuses particular attention on protecting the outstanding scenery along about 2-1/4 miles of the headwaters of the segment in the proposed American Basin Area of Critical Environmental Concern (ACEC).</p> <p>If designated, the management plan could incorporate cooperative agreements with private landowners regarding the management of values in the segment. This approach would be preferred in lieu of fee simple acquisition or the acquisition of easements. Some landowners could be willing participants while others would not.</p>
<p>Page I-13; APPENDIX I; LAKE FORK OF THE GUNNISON WILD AND SCENIC RIVER STUDY REPORT; SUITABILITY DETERMINATION SUMMARY; Third paragraph, continuing to page I-14.</p>	<p>**Change the paragraph to read as follows. "The scenic values in the segment are currently afforded significant protection through the Loop Road scenic withdrawal, interim management protection in the Redcloud and Handies Peak Wilderness Study Areas, the Recreation Area Management Plan and the State of Colorado reservation of instream flows. Implementing the recommendations in the proposed American Basin ACEC would provide additional protection for the values. Designation as a Recreational component of the Wild and Scenic River system would not offer any significant improvement in the protection of this area's outstanding scenery."</p>
<p>Pages M-1 through M-5; APPENDIX M; ACCESS; Tables M-1, M-2, M-4, and M-5; AREAS TARGETED FOR ACCESS IN (various alternatives); information regarding the ALPINE GULCH area.</p>	<p>Regarding ALPINE GULCH targeted access: **Table M-1: ; Under the column TARGETED AREA: after the entry ALPINE GULCH, add "(Hiking and Horse Only)"; and under the column BENEFITTING PROGRAMS, add an "X" under the sub-column Livestock Grazing Management. **Table M-2: Under the column TARGETED AREA: after the entry ALPINE GULCH, add "(Hiking and Horse Only)"; and, under the column BENEFITTING PROGRAMS, add an "X" under the sub-columns Livestock Grazing Management and Recreation, and delete the "X" under sub-column Forestry.</p>

Table 3-1 (Cont'd.)

CHANGES TO THE DRAFT RMP/EIS

LOCATION OF CHANGE	CHANGE
<p>Pages M-1 through M-5; APPENDIX M; ACCESS; Tables M-1, M-2, M-4, and M-5; AREAS TARGETED FOR ACCESS IN (various alternatives); information regarding the ALPINE GULCH area. (Cont'd.)</p>	<p>Regarding ALPINE GULCH targeted access: **Table M-4: Under the column TARGETED AREA: after the entry ALPINE GULCH, add "(Hiking and Horse Only)". **Table M-5: ALPINE GULCH DRAINAGE: Under the column TARGETED AREA: within the parens after the entry ALPINE GULCH DRAINAGE, add "AND HORSE ONLY" following "HIKING"; and, under the column BENEFITTING PROGRAMS, add an "X" under the sub-column Livestock Grazing Management. **Table M-5: SANDY MESA(ON BLUE MESA): Under the column TYPE OF ACCESS DESIRED, add an "X" under the sub-column PUBLIC, and under the column BENEFITTING PROGRAMS, add an "X" under the sub-columns Livestock Grazing Administration and Forestry.</p>
<p>Page 8; GLOSSARY.</p>	<p>SUITABLE COMMERCIAL FOREST LANDS: **substitute "long-term" for "low-term".</p>
<p>Map 4, Alternative E, in envelope.</p>	<p>**Delete the southernmost (upstream) polygon within Management Unit E-15 along Cebolla Creek. The land within this approximately one-mile portion of the creek would thus be located within Management Unit E-10. The acreage figures of both units would change by about 73 acres, assuming the polygon to be deleted is about 60' in width.</p>



Map 3-1
Pronghorn Antelope Range
in the Planning Area

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DESCRIPTION OF THE PROPOSED RESOURCE MANAGEMENT PLAN

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DESCRIPTION OF THE PROPOSED RESOURCE MANAGEMENT PLAN

DEVELOPMENT AND OBJECTIVES

The Proposed Resource Management Plan (PRMP) is essentially the Preferred Alternative from the Draft Gunnison Resource Management Plan and Environmental Impact Statement (DRMP), with changes reflecting BLM's analysis of the public comments received on the DRMP, internal review, and other comments. The PRMP represents the mix and variety of actions that, in the judgement of the preparers, best resolves the issues and management concerns that drove the preparation of the plan. Therefore, no ranking order of resources was developed, as was done for some alternatives in the DRMP. Under the PRMP, resources and resource used would be managed under the multiple use concept and according to the Standard Management section and the Management Unit prescriptions in this chapter.

Please refer to Table 4-1 for a list of Management Units and acres for the PRMP. The Management Unit development for the PRMP is explained in the section of this chapter titled MANAGEMENT UNIT PRESCRIPTIONS FOR THE PROPOSED RESOURCE MANAGEMENT PLAN (1-16).

This chapter contains two sections: Standard Management and Management Unit Prescriptions. The folded map showing Management Unit boundaries, land ownership, and other features is inserted into this document.

All actions proposed in this plan would comply with current applicable state and federal regulations, laws, and policies. In certain instances, laws, regulations, or policies would require some management actions to receive overriding priority in conflict resolution, such as protection of threatened and endangered species, or historical or archaeological resources.

STANDARD MANAGEMENT FOR THE PROPOSED RESOURCE MANAGEMENT PLAN

Under the PRMP, some resource management programs would be implemented according to

standard management directions throughout the Planning Area. Management of resources identified as a result of future inventories or discoveries would generally be the same as for resources discussed and identified in this RMP/EIS. *Unless changes in or additions to standard management directions are specifically addressed in the prescription for each Management Unit, these resources/resource uses, programs and activities would be managed as follows:*

Air Quality. Activities and projects on public land would comply with applicable local, state, and federal air quality regulations. Mitigation to minimize air quality degradation would be incorporated into project proposals as necessary. Additional air quality monitoring may be implemented by BLM when necessary.

Locatable Minerals. Federal mineral estate in areas not under withdrawal would be open to entry and location under the general mining laws. Plans of operation would be required for proposed locatable mineral activity on the following lands: 1) lands under wilderness review, 2) lands closed to Off-Highway Vehicle (OHV) travel, and, 3) lands within designated Areas of Critical Environmental Concern (ACECs).

Oil, Gas, and Geothermal Resources. Federal oil, gas, and geothermal estate on both federal surface and split-estate lands, that is, private or other non-federal surface estate overlying federal mineral estate, would be open to leasing with standard lease terms. Other special stipulations and conditions for leasing such as no surface occupancy and seasonal restrictions are assigned or specified in each management unit prescription and as deemed necessary; these special stipulations and conditions would also apply to federal surface and split-estate lands. Additional conditions consistent with lease terms would be considered when BLM processes and develops mitigation for operational field applications. Operational field applications and activities include Applications For Permit To Drill (APDs), Sundry Notices, applications for rights-of-way, and Notices Of Intent (NOIs) for geophysical operations. See

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Appendix K for special stipulations and conditions for leasing on both federal surface and split-estate lands, and for an explanation of how stipulations assigned to split-estate lands would be applied, reviewed, waived, modified, or excepted, based on verification of surface and mineral estate resource information by BLM during review of Applications for Permit to Drill (APD). The most reasonable foreseeable level of oil, gas, and geothermal development in the planning area would involve a maximum of one or two APDs during the life of the plan, with an estimated total of ten acres of surface disturbance. Leasing of any federal minerals within existing Wilderness Study Areas (WSAs) would be prohibited according to existing legislation until WSAs are released by Congress by non-designation or other Congressional action, or until leasing is no longer prohibited by legislation.

Saleable Minerals. Disposal of mineral material on federal mineral estate would be permitted. Disposal of mineral materials from specific areas is discretionary with the authorizing official and would be determined on a case-by-case basis. Disposal of mineral materials within power site reserves or within other agency withdrawn lands would require approval of the agency reserving the withdrawal.

Soils and Water Resources. Soils and water resources would continue to be monitored to define problem areas, develop management strategies, and to determine effectiveness of solutions. Vegetation treatments on soils having a moderate to severe erosion potential, and lacking adequate plant basal cover would be designed and managed to increase plant basal cover, therefore reducing erosion. New forage created by wildlife or range improvements, treatments, or projects would be available for those programs after basal vegetation cover densities are achieved for watershed needs and protection, as defined in the guidelines above. Table N-1 in Appendix N shows the target % basal cover to be achieved on various ecological (range) sites in the uplands before new forage would generally be used for wildlife habitat or livestock grazing uses. Table N-1 is derived from Appendix F of the Montrose District Soil Erosion Monitoring Guidelines, a document that provides techniques and a standardized approach for monitoring surface soil erosion in the

Montrose District. Vegetation treatments would be designed and implemented in accordance with the Montrose District Rangeland Treatment Handbook. This handbook provides a standardized approach for planning and implementing vegetation manipulations and treatments within the Montrose District. The sediment control plan for Long Gulch, and other plans would continue to be implemented. Water rights would be applied for where appropriate, including along 113 miles of fishery streams. Best management practices would be employed to reduce soil erosion and water quality deterioration, and would be required in all plans involving surface disturbance. Roads and other developments would be maintained in good condition to minimize erosion.

Vegetation. Vegetation resources would be managed to maintain or achieve at least a late seral ecological status by maintaining or improving the vigor, production and diversity of desirable plants within alpine, sagebrush/mixed mountain shrub, and woodland types at a level to support a variety of resource uses, including, but not limited to livestock grazing, wildlife habitat and recreation.

Specific, desired plant communities would be identified in activity plans. Exceptions to a late seral ecological status needed to meet objectives would be identified in activity plans.

Resources and values in riparian areas would be maintained, restored, or improved, including the diversity, vigor, and quantity of herbaceous and woody plants necessary for the 1) hydrological functioning of riparian systems, 2) control of accelerated soil erosion, and 3) sustained high quality livestock forage and wildlife habitat.

Riparian Zones. Riparian areas would be managed to maintain, restore, or improve riparian conditions (hydrological, soil and vegetation), such that proper functioning conditions are achieved, and to enhance natural values. Riparian areas would be inventoried and prioritized where necessary to determine site-specific management strategies. Strategies, projects, or improvements would be included in activity plans and would be implemented by priority, as to be determined by the inventories. New water sources would be developed with concern for the protection

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of riparian areas. Existing water source developments within riparian areas would be modified, or relocated, if inventories and studies indicate the hydrologic condition is being negatively impacted from use of the development. Water developments that are range improvements would be

modified or relocated in accordance with 43CFR 4120. Existing riparian demonstration areas and improvements would be maintained. Road construction or similar projects could be authorized in riparian areas only when a feasible, alternative route cannot be found; roads or similar projects

Table 4-1

MANAGEMENT UNIT ACRES AND VALUES IN THE PROPOSED RESOURCE MANAGEMENT PLAN

MANAGEMENT UNIT	ACRES OF PUBLIC LAND	PERCENTAGE OF THE PLANNING AREA¹	IMPORTANT VALUES RESOURCES OR LAND USES
1	95,827	15%	Recreation, wildlife, visual, historic, and locatable mineral resources
2	47,762	8%	Recreation and visual resources
3	2,710	Less than 1%	Recreation, visual and mineral resources
4	1,597	Less than 1%	Recreation, visual and mineral resources
5	5,960	1%	Special status species and mineral resources
6	1,405	Less than 1%	Geologic phenomena, interpretation, and locatable mineral resources
7	28,275	5%	Wildlife and livestock grazing
8	4,570	Less than 1%	Special status species
9	532	Less than 1%	Visual resources and recreation
10	15,112	3%	Wildlife
11	57,525	10%	Wildlife, soils and livestock grazing
12	91,547	16%	Wildlife, livestock grazing, and locatable mineral resources
13	188,030	30%	Livestock, grazing, recreation, wildlife habitat, forestry and locatable mineral resources
14	2,667	Less than 1%	Riparian, wildlife, fisheries and livestock grazing
15	4,725	Less than 1%	Riparian, wildlife, fisheries and livestock grazing
16	36,768	6%	General land uses, recreation and wildlife

¹ Rounded to whole numbers; this column shows the percentage of the public land (surface estate) in the Planning Area that is located in each Management Unit in the PRMP.

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would cross riparian zones as nearly perpendicular to the centerline of the riparian zone as is possible. Objectives are to limit road construction in riparian zones to an absolute minimum, in order to retain and protect as much riparian vegetation, soils, and water as is possible. Existing roads could be relocated or modified if degradation of the aquatic or riparian system is occurring. No commercial timber harvesting would occur in riparian areas, or in a 30-foot area either side of riparian areas, unless riparian or wildlife values would be improved. Logging decks or staging areas would not be permitted within riparian areas or in a 30-foot area either side of riparian areas. Trees cut adjacent to riparian areas would be felled in a direction away from the riparian area, or in such a manner as to minimize riparian area disturbance. Tracts of land which would enhance the recreational opportunity or ecological value of existing riparian areas would be identified for acquisition during the riparian inventory. Measures designed to minimize site-specific riparian deterioration would be required in all plans for surface-disturbing activities.

Wetlands would be inventoried, classified, and considered in all plans for surface-disturbing activities on public lands.

Special Status Plant and Animal Species and Habitat. Habitat supporting existing populations of United States Fish and Wildlife Service (USFWS) listed threatened and endangered species, and USFWS candidate, and BLM sensitive species, would be maintained and protected to ensure suitable habitat conditions and viable populations. These species would continue to be inventoried and monitored to provide information for future management. Measures to protect these species and associated habitat would be required in all plans for surface-disturbing activities. Supplemental releases and/or reintroduction of these species could be authorized following preparation of a release or reintroduction plan and environmental analysis, and consultation with the USFWS, Colorado Division of Wildlife (CDOW), and other affected parties. Section 7 consultations would be conducted with the USFWS regarding potential impacts to federally listed species. The Threatened and Endangered Species Act

would provide full protection for USFWS listed species.

Wildlife Habitat Management. The Habitat Management Plan (HMP) for the Planning Area would be revised and implemented consistent with BLM's Fish and Wildlife Plan for Colorado - Program for the Decade. The HMP would prescribe land use and species management guidance for the mutual benefit of wildlife, fish, special status plant and animal species and habitat, and other resources on public lands. Objectives of the revised HMP would include, but would not be limited to, methods to manage lands to help meet, within carrying capacities of the habitat, CDOW long-range herd goals, maintain or improve vegetation communities to benefit both game and non-game wildlife, implement a program to increase the quantity and quality of crucial big game winter range, and implement cooperative plans and projects with CDOW and other organizations to maintain or enhance big game and/or upland game habitats. Recommended actions would be determined after considering and evaluating potential effects on other lands, resources, or uses.

The BLM would continue to participate in the Colorado Habitat Partnership Program (HPP) with private landowners and managers, and state and other federal land managing agencies. The HPP would, among other purposes, implement strategies to resolve concentrated big game forage utilization, and develop herd management objectives for the effected areas, whether on private, state, or federal lands. Public lands would play a vital role in these tasks, and revisions or amendments to the approved RMP could be necessary.

Terrestrial Wildlife and Habitat

Elk and Deer Habitat: Measures to increase and improve important deer and elk winter forage shrub species on uplands and riparian areas within crucial winter ranges on public lands would be determined and treatments implemented through activity plans to help achieve, within carrying capacities of the habitat, CDOW long-range herd goals (as established by CDOW in April, 1985) of 9,000 elk and 16,600 deer. Big game utilization would be managed so that proper

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use levels on key wildlife species would not be exceeded. The CDOW and BLM would continue to coordinate herd management objectives and goals on public lands, and would consider and evaluate the potential effects on other resources, lands, and uses, and whether public land big game ranges could support increases in animals, in order to insure that sufficient forage is available. Overall objectives would be to increase and improve habitat and forage conditions on winter and summer ranges.

Existing and future wildlife utilization monitoring results would be evaluated to determine areas where use of key forage species consistently exceeds moderate use (40-60%). Factors resulting in this level of big game use would be determined, and adjustments would be recommended and made in numbers or habitat to achieve better forage conditions and a proper use level. Temporary decreases in big game numbers would be recommended, if necessary, in order to achieve proper use levels on key wildlife plant species. These changes and adjustments would remain in effect until habitat conditions improve such that allocations could be increased to former numbers. New or additional forage made available as a result of wildlife projects or treatments would be used first to satisfy watershed objectives as defined in the Montrose District Soil Erosion Monitoring Guidelines. Forage excess to watershed needs would be used to meet overall habitat objectives. See Table N-1, Appendix N, for target basal cover densities that would be achieved on treated areas before forage would generally be available for wildlife needs. Table N-1 is derived from Appendix F of the guidelines referenced above.

Crucial winter range and commercial forest lands would be inventoried for condition, and monitored for utilization and trend relative to big game habitat. Public lands would be inventoried to identify elk calving areas. Acquisition of non-federal lands to increase or enhance management of big game crucial winter range would be emphasized. Reductions in CDOW's elk and deer long-range herd goals would be recommended for an interim period in certain Game Management Units (54: elk and deer; 55, 64, 65, 66, 67, and 551: deer only) until the vigor and production of the important forage shrubs on crucial winter ranges increases such that habitat would support long-range herd numbers. See Tables A2

and A-3 in Appendix A for long-range elk and deer herd goals that would be recommended on BLM-managed lands, and Table A-4 for interim elk and deer numbers that would be recommended on BLM-managed lands, by Game Management Unit (GMU). Table A-5 shows the CDOW GMU numbers keyed to the Management Unit numbers in this PRMP.

Pronghorn Antelope and Bighorn Sheep Habitat: Measures to improve habitat for pronghorn antelope or bighorn sheep would be permitted. Inventories would be completed to identify suitable areas in which to establish new populations of bighorn sheep and pronghorn antelope; supplemental releases and reintroduction could be authorized by the District Manager following environmental analysis. Pronghorn antelope and bighorn sheep habitat on public lands would be managed for 500 animals of each species. Inventories would be conducted to identify bighorn sheep lambing areas and suitable winter range. Monitoring studies would be established within bighorn sheep and pronghorn antelope ranges.

Sage Grouse and Other Upland Game Bird Habitat: Identified sage grouse brood-rearing habitat and nesting areas, and winter habitat would be maintained or improved. Sagebrush and riparian vegetation on public land would be managed to support approximately 9,000 sage grouse. Sage grouse strutting grounds (leks) would be protected from destruction. No surface-disturbing activities would be permitted within 1/4 mile of all leks during the April 1 through May 31 strutting season to prevent disturbance to mating sage grouse. This period of time could be shortened or lengthened, depending on whether grouse are present and using the habitat. The guidelines for management of sage grouse habitat areas in Appendix A would be used whenever possible in the design and planning of land treatment projects to offset impacts from these projects to sage grouse and habitat.

Inventories would be conducted to identify suitable areas in which to establish populations of Columbian sharp-tailed grouse (*Pedioecetes phasianellus*) and Merriam's turkey (*Meleagris gallopavo*). Releases could be authorized by the District Manager

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following preparation of a release or reintroduction plan and environmental analysis and documentation.

Non-game Wildlife Habitat: The quality of endemic non-game animal species habitat would be enhanced by 1) improving and/or maintaining a variety of native plant species and vegetative structure in upland and riparian areas, 2) improving the ecological condition of sagebrush communities, and 3) improving or maintaining non-game habitat within commercial forest lands. Raptor nesting inventories and monitoring studies would be updated to identify nesting areas and establish population trends. Measures and stipulations in Table A-6, Appendix A, designed to prevent disturbance to raptors through their post-fledgling period, would be considered in all plans involving surface disturbance.

Fishery Resources (Aquatic Habitat)

Fishery streams and associated riparian areas would be managed to improve or maintain the existing ecological status (hydrological, soil and vegetation). Streams and aquatic habitat would be inventoried and monitored to determine site-specific management strategies. Inventory information would be used to determine projects or improvements to be included in new or revised HMPs, CRMAs, AMPs and other activity plans. The objectives and goals contained within the *BLM and Forest Service Recreational Fisheries Policy, 1990*, or as amended, would be implemented in order to meet cooperative fishery management objectives. This document provides cooperative policy and goals for fishery-related recreation activities for the BLM and the Forest Service.

Instream flow appropriations would be pursued on 113 miles of fishery streams to ensure a sufficient amount of water for fisheries protection.

Surface disturbing activities would be designed with measures to prevent or mitigate damage to or loss of fishery stream channels and associated riparian habitat.

Livestock Grazing Management.

General Management

Approximately 470,460 acres of suitable public lands would be available for livestock grazing. Public lands unsuitable or unavailable for livestock grazing would continue to be excluded from livestock grazing unless monitoring or other sources of data indicate that the areas may be used for grazing. Total grazing preference in the Planning Area is approximately 62,372 Animal Unit Months (AUMs), of which approximately 46,904 AUMs would be authorized for active use, and the remainder would be suspended use. Allotment categorization would be re-examined as needed based upon a change in categorization factors identified from monitoring data or other management and resource information.

General Management Within "M" and "C" Allotments

Existing allotment categorization and corresponding management levels, as defined in the 1987 Rangeland Program Summary (RPS), would be carried forward on all category "M" and "C" allotments.

Management Within "I" Allotments

On category "I" allotments, existing management and/or forage allocation levels would be adjusted when supported by monitoring data or other management and resource information, to achieve or maintain a desired plant community, and to meet the following resource needs.

1. Within Uplands:

Utilization of key forage species in uplands would be managed at levels that would allow for plant health or maintenance, watershed cover needs, and to provide quality forage and wildlife cover. On allotments without activity plans or grazing agreements prescribing grazing strategies designed to meet these needs, the maximum use

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level in uplands would be 40-60% of the current years production by weight on key forage species during the period of use. This would allow for at least minimal management to begin on category "I" allotments until funding and personnel allow for activity planning and more intensive management.

2. Riparian Area Management Specific To Unit 14:

A 4-inch minimum stubble height would be maintained in Management Unit 14 (riparian areas that have been identified as important for sage grouse brood rearing) from June 15 through July 31. A 2½ inch stubble height would be required at all other times in Management Unit 14. It is expected that not only will sage grouse benefit, but in the mid to long-term, riparian areas would expand in size, resulting in more livestock forage.

3. Riparian Area Management Specific To Unit 15:

A 4-inch minimum stubble height would be maintained during the grazing period of use in Management Unit 15 (riparian areas that have been identified as important for fisheries management). These riparian areas would also be expected to improve in terms of fisheries, livestock forage production and other wildlife habitat needs.

4. Riparian Area Management Specific To Units 14 and 15:

In Management Units 14 or 15, the requirement to maintain a 4 inch stubble height would be flexible on allotments covered by activity plans or grazing agreements which prescribe other grazing strategies, if these strategies clearly demonstrate the ability to achieve riparian area management objectives. Site specific objectives would be consistent with riparian area goals established in this plan for Management Units 14 and 15. The 4 inch stubble height requirement would be incorporated into all existing activity plans in these two management units, since existing plans do not adequately address riparian concerns. When outdated activity plans are evaluated,

modified, or revised, riparian concerns would address the management guidance described above.

The requirement to maintain a four inch stubble height in units 14 or 15 would become effective upon the signing of the ROD. In these units, this minimum 4 inch stubble height requirement would not be effective immediately if vigor and production of herbaceous riparian plants is not sufficient to meet livestock and wildlife needs, and adequate residual cover is not present. Flexibility would be considered for other management strategies defined in an activity plan or grazing agreement which adequately addresses riparian concerns.

In riparian areas in Management Units 14 and 15 where a 4 inch stubble height for key species would clearly not be achieved immediately upon implementation of the approved RMP, and where the key species have low vigor, there would be a recovery period of approximately one or two years that would depend on moisture conditions and other factors. This would allow plant vigor to improve and also would allow time to generate sufficient forage production for livestock needs and residue needed to maintain the 4 inch minimum stubble height. Recovery or improvement in vigor would be accomplished by rest, deferment, or other grazing strategies. Where these conditions exist on allotments in units 14 or 15, a 2 1/2 inch minimum stubble height would be required during the period of use in order to help improve vigor of riparian vegetation. Flexibility to this requirement would be considered for those allotments in units 14 and 15 with activity plans or grazing agreements which prescribe other grazing strategies, if these strategies clearly demonstrate the ability to achieve riparian area management objectives.

5. Riparian Area Management Within "I" Allotments Except Those in Units 14 and 15:

Utilization of key forage species within all other riparian zones would not exceed 40-60% of the current years production, with a 2½ inch minimum stubble height maintained throughout

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the period of use. Utilization levels lower than 40% may be prescribed in severely degraded riparian areas. The 2½ inch stubble would allow for at least minimal management to begin on category "I" allotments until funding and personnel allow for activity planning and more intensive management. Flexibility to this 2½ inch stubble would be considered on those allotments with new activity plans or grazing agreements that utilize other grazing strategies, if these strategies clearly demonstrate the ability to achieve riparian management objectives. Site specific objectives would be consistent with riparian area goals established in this plan, including the maintenance, restoration, or improvement of riparian conditions (hydrologic, soil, and vegetation) and natural values. The 2½ inch stubble height would be incorporated into all existing AMPs or other activity plans, excluding those for allotments in Management Units 14 and 15. When outdated activity plans are evaluated, modified, or revised, riparian concerns would address the management guidance described above.

6. Management Common To All Riparian Zones in "I" Allotments:

a) Residual cover, or stubble height, is needed to improve or maintain riparian areas to a condition to allow proper hydrologic functioning during peak flows, reduce soil erosion, increase plant vigor (and eventually livestock forage), and to improve wildlife habitat (Clary and Webster 1989, Holechek et al 1989, Kinch 1989, Myers 1989, Platts 1982, USDA 1985). A minimum stubble is necessary during critical periods, such as spring runoff and the July and August thunderstorm season. Critical periods vary from allotment to allotment due to elevation and other factors. Livestock would generally be turned into areas after key species have made sufficient growth to maintain the required minimum stubble heights. This would be consistent with the existing range readiness criteria (Appendix B) and average turnout dates. On allotments with AMPs or other activity plans, objectives and actions from these plans would also be considered when determining turnout dates. This would provide

flexibility for early turnout on areas where plant maintenance and riparian system needs have been met.

b) The key herbaceous riparian forage species managed to maintain either a 4" or a 2 1/2" minimum stubble height objective would be grasses such as, but not limited to, Kentucky bluegrass, Bromegrass, Redtop, Wheatgrass, Timothy, Tufted hairgrass, sedges, and rushes.

c) Livestock would typically be moved out of riparian areas to other pastures or other areas in the same pasture with adequate forage when the prescribed stubble height objective has been met or when other management prescriptions defined in activity plans or grazing agreements are fulfilled. Determining when required minimum stubble heights for riparian areas have been reached would be when key species average the minimum stubble height over 80% of the entire riparian area. Realizing there are areas where cattle congregate or are gathered, the remaining 20% of a riparian area in a pasture or allotment could be grazed more heavily than required minimum stubble heights. Determining when other grazing strategies, defined in activity plans or grazing agreements, have been fulfilled would be done by field compliance checks. Permittee participation in field compliance checks would be encouraged.

Grazing Administration

Grazing administration under the PRMP would be conducted in accordance with the following standard operating procedures as prescribed in the Code of Federal Regulations 43 CFR 4100:

1. Grazing permits specifying the season of use, number, and kind of livestock would be issued to each operator for each allotment. Operators would have to obtain BLM approval before changing the grazing specifications outlined in their permits.
2. Livestock operators would be required to file actual-use reports showing how many and how long livestock grazed in each allotment

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and/or pasture. Use on the allotments would be supervised by BLM throughout the grazing year.

3. If necessary, actions resolving unauthorized use would be initiated as described in 43 CFR 4150. The unauthorized use would be eliminated and appropriate penalties assessed.
4. If it were determined, through monitoring, that adjustments in grazing preference or active use were necessary, implementation of changes in available forage would be done in compliance with 43 CFR 4110.3. Where possible, adjustments would be implemented by mutual agreement with the permittee. If agreements could not be negotiated, adjustments would be implemented by decision.

Range Improvements

Structural and non-structural range improvements such as fences, water developments, burns, spray treatments, and others would continue to be identified and prescribed in activity plans or agreements. This would facilitate livestock management to achieve specific management and resource objectives defined in activity plans or agreements. Range projects and improvements constructed since 1981, and the amount of BLM funds expended for these improvements, are shown in Table B-2, Appendix B. Table B-2 shows past trends regarding range improvements constructed in the Planning Area. Range improvements identified in the Gunnison Basin Management Framework Plan (MFP) Record of Decision (ROD) would not be incorporated into the PRMP. However, any range improvements identified in the MFP ROD that were not implemented, and would enhance or facilitate resource management objectives would be considered for development. Existing range improvements would continue to be maintained as assigned in cooperative agreements and range improvement permits.

Cooperative agreements would be the preferred method to authorize range improvements. These agreements would be used to authorize all structural and non-structural, multiple-use range improvements (removable and non-removable). Range improvement

permits would be used to authorize single use, removable range improvements required for livestock operations. These range improvements would be paid for and constructed by the permittee, or other non-federal entities. Maintenance would be assigned and contributions defined in both cooperative agreements and range improvement permits. All range improvement permits and cooperative agreements would comply with 43 CFR 4120.3-2.

BLM's range improvement funding varies from year to year, depending on grazing fee receipts. Expenditures of funds would be budgeted and prioritized as follows:

- 1) Projects or treatments in which the Bureau of Land Management has the responsibility for operation, maintenance, or reconstruction.
- 2) Projects that conform with and would complete partially implemented activity plans.
- 3) Improvements prescribed in new activity plans or agreements.

Exceptions to this prioritization would be considered to avoid, minimize, or rehabilitate the effects of emergencies. Consideration would also be given to removal, modifications, or additions to improvements prescribed in existing activity plans that would further enhance resource conditions or take advantage of contributed funds. Category "I" allotments would normally receive priority over category "M" and "C" allotments.

All cost share or BLM funded improvements would require site specific environmental analysis, economic analysis, and resource clearances (cultural, threatened and endangered species etc.) before being authorized. Rancher or user funded projects would also require environmental analysis and appropriate resource clearances before being approved. Cooperative agreements and range improvement permits would specify the standards, design, construction, maintenance, or special conditions for range improvements or treatments.

Any additional forage available for livestock as a result of range improvements, treatments, or grazing management procedures would be allocated in

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accordance with 43 CFR 4100, with consideration given to meeting the basic soil and watershed needs defined in the Montrose District Soil Erosion Monitoring Guidelines. See Table N-1, Appendix N, for target basal cover densities that would be achieved on treated areas before forage would be available for livestock grazing needs. Table N-1 is derived from Appendix F of the guidelines referenced above. Any additional forage available for livestock would be considered in reactivating suspended use or as a means to avoid suspending active use.

Fences

Fences would be installed according to spacing, height, and other specifications described in the BLM Manual, Section 1740 and Handbook H-1741-1, for the control of livestock as well as the protection of wildlife. An example would be spacing the bottom wire of a 3-wire fence at 16 inches above the ground in pronghorn antelope ranges. Variances from these standards require approval of the authorized officer after consultation with affected parties.

Water Developments

Federally funded livestock watering developments such as reservoirs (ponds), spring developments, wells, water pipelines etc. would be developed and be safe for livestock and wildlife needs.

The appropriate State Engineer permits would be obtained for each project.

Weed and Pest Control

A cooperative noxious weed program would be initiated with county governments and other affected interests within the planning area.

Land Treatments

Vegetation treatments would be done in accordance with approved BLM methods such as management application (grazing), burning, spraying, chaining, etc. Noxious weed control would be completed in cooperation with the local county weed board and

other affected interests. After vegetative manipulation has been completed, allotments must be managed to ensure the maximum opportunity for success. This could include, but is not limited to: (1) rest from livestock grazing for a minimum of two growing seasons, (2) fencing of the area for protection of vegetation, and (3) establishing a grazing practice to ensure proper use of the area following manipulation. To prevent erosion, land treatments would generally not be done on slopes greater than 25 percent depending on soil treatment type, equipment limitations, etc.

Reclamation of disturbed areas would involve seeding or planting a mixture of the major native species present within the range site/habitat type that are available commercially. If the erosion hazard is high, introduced species such as crested wheatgrass or annual rye may be used.

Activity Plans and Grazing Agreements

Existing and future activity plans, such as AMPs or CRMAs, would, based on staffing capabilities, be evaluated and either modified or revised as necessary, using a coordinated interdisciplinary approach. New activity plans would also be developed with interdisciplinary input and consultation with permittees and other affected interests. Activity plans would incorporate allotment specific objectives for maintaining or improving livestock forage, wildlife and fish habitat, and riparian areas. Activity plans would also prescribe management actions including grazing practices, range improvements, changes in season of use, and other management actions to achieve allotment specific objectives. Innovative or non-traditional management strategies would also be considered.

Allotment specific objectives and management actions required to achieve those objectives would also be defined in grazing agreements. Management actions would also be included in the terms and conditions of permits or leases in compliance with 43 CFR 4130.6-2. This would allow for intensive management to address resource concerns when inadequate funding or personnel exist to prepare activity plans.

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Monitoring

Monitoring data collected would include interdisciplinary coordination and be conducted in accordance with the following procedures.

1. Actual use data would be obtained by indirect methods (statements from permittees which includes livestock numbers and periods of use) for all grazing allotments. All livestock operators would be required as part of the permit to submit actual use by pasture within 15 days from the end of the grazing season. Direct methods (counting livestock) for obtaining actual livestock numbers would be used as needed.
2. Utilization data would be collected on scheduled allotments or areas of concern using procedures described in BLM Technical Reference 4400-3. Stubble height measurements would document forage which is present during and/or after use has occurred. Stubble height would be measured as an average of the key species for the area observed. Utilization data would be used for evaluating the effects of grazing on rangeland to determine appropriate management strategies.
3. Rangeland trend monitoring would be conducted using procedures described in BLM Technical Reference 4400-4. The selection of method(s) for data collection would consider management objectives, vegetation attributes (density, frequency, production, etc.) and actions for the allotment or area(s) of concern. Trend monitoring would be conducted as frequently as needed to satisfy data requirements for the allotment and/or other designated management area(s) evaluation.
4. Range readiness criteria for the Gunnison Resource Area considers both indicators of soil readiness and vegetative readiness. Plant species listed in Appendix B would be used, where applicable, as indicators of vegetative readiness. Key forage plant species would be considered as part of the overall range readiness evaluation for the specific allotment or area. Evaluation would be based on stage of development and/or size of

plants. Ecological site, aspect, elevation and climate would be considered when evaluating development and/or size of plants.

Range readiness criteria would be considered when requests for livestock turn-out dates are earlier than dates specified on permits or when vegetation growing conditions are affected by drought or other natural or man-caused influences, such as, fire.

Range readiness would be incorporated into existing AMP's utilizing the criteria specified in Appendix B. However, the readiness criteria for allotments with AMP's or other activity plans would be specific to the allotment and/or areas within it. On allotments with AMPs or other activity plans, objectives and actions in these plans would also be considered when determining turnout dates. This would provide flexibility for early turnout on areas where plant maintenance and riparian system needs have been met. Range readiness criteria as documented in Appendix B would be used until specific criteria can be incorporated into each AMP or other activity plan.

5. Use supervision on scheduled allotments or areas of concern would include counting livestock and observing distribution patterns; inspecting range improvements; observing apparent trend, utilization and growing conditions; and observing wildlife populations and movements, wildlife habitat, watershed and riparian conditions as needed. Documented observations made during use supervision field visits would identify where changes in grazing management are needed or those areas where more intensive monitoring is needed.
6. Precipitation data from rain gauges along with soil moisture monitoring and temperature data would be used to correlate vegetation production variations resulting from yearly variations in climate.
7. Soil erosion would be assessed in conjunction with rangeland trend and utilization monitoring.

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8. Water quality and quantity would be monitored as necessary to determine the location of problem areas.
9. Ecological site inventories for uplands and riparian areas would be conducted in preparation for activity plans as needed on category "I" allotments. This would be done as part of the activity plan preparation process and as funding and personnel allow.

The types of data listed above would be used when evaluating stated objectives or actions on an allotment or specific area. The intensity of monitoring conducted for an allotment or specific area are determined, in part, by the Bureau's classification criteria for I, M, and C allotments. Other considerations for monitoring implementation include allotments with AMP's, allotments delineated as high priority for AMP or other activity plan development, and delineated areas of concern (i.e. riparian areas).

Forest Management. Suitable commercial forest lands and woodlands would be managed for sustained yield production within the allowable cut restrictions and guidelines determined by the Timber Production Capability Classification (TPCC). Special emphasis would be placed on the harvest of over-mature and pest-killed trees.

Approximately 41,347 acres of suitable commercial forest lands, and 23,615 acres of suitable woodlands in several Management Units would be available for harvest. Approximately 1,200 MBF of commercial timber, 490 cords of fuelwood, 400 wildings, and, on average, 300 Christmas trees could be considered for harvest annually on a sustained yield basis. Amounts of commercial timber or other forest products actually offered for disposal or sale annually would depend on staffing capabilities, management priorities, and other factors. Timber Production Capability Classification would be conducted on approximately 10,000 acres. Backlog reforestation would be conducted as funds become available. Site preparation would be completed as needed, with emphasis given to backlog site preparation. One Planning Area-wide FMP would be completed that would incorporate and update the two existing FMPs.

Harvest of commercial timber on slopes greater than 35% would be restricted to cable or helicopter methods only. Timber sales would be designed to allow sufficient elk hiding cover along logging roads and all clearcuts. Emphasis would be given to the maintenance and protection of watershed, soil, and vegetative resources in all timber sales and FMPs. Timber harvests would be designed and implemented to help improve or maintain non-game wildlife habitat. The conditions and standards in Appendix A would be incorporated into all plans for timber harvests in order to improve non-game habitat. Plans for aspen stand harvest would include design measures to increase the production and growth of young, vigorous aspen for big game forage. Sale area design and layout would include measures to blend harvest areas into the surrounding landscape and increase scenic variety. No commercial timber harvesting would occur in riparian areas, or in a 30-foot area either side of riparian areas, unless riparian or wildlife values would be improved. Logging decks or staging areas would not be permitted within riparian areas, or in a 30-foot area either side of riparian areas. Trees cut adjacent to riparian areas would be felled in a direction away from the riparian area, or in such a manner as to minimize riparian area disturbance.

No timber harvesting would be allowed from April 16 to June 30 in elk calving areas to prevent disturbance to calving elk. The harvesting of timber or timber products on lands within existing WSAs would not be permitted.

Recreation Management. The public lands within the Planning Area would be managed consistent with BLM's *Recreation 2000: A Strategic Plan* to ensure the continued availability and diversity of resource-dependent outdoor recreation opportunities. Management would focus on resource protection, visitor services and information, and the construction, operation and maintenance of recreation facilities. Emphasis would be placed on providing a variety of recreation opportunities and experiences through visitor awareness, information, interpretation, signing, and protection. Efforts would be made to expand and strengthen cooperative partnerships with Federal, State and local agencies, the private sector

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and volunteers to enhance recreation opportunities and tourism. Where appropriate, recreation opportunities would be enhanced through land ownership adjustments, improved access, easements, exchanges and other acquisitions. Tracts of land which would enhance the recreational opportunity or ecological value of existing riparian areas would be identified for acquisition during the riparian inventory.

The number of recreation visitors to the Planning Area is expected to increase by about 40% during the life of the plan.

Public lands in the Cochetopa Canyon and Alpine Triangle Special Recreation Management Areas (SRMA) would be managed for a variety of recreation, scenic, and historical opportunities and settings at developed and dispersed sites. Resources in the Cochetopa Canyon SRMA would be managed for a roaded-natural ROS setting, and according to the prescription for Management Unit 3 and the existing activity plan. A CRMAP for the Alpine triangle SRMA would be prepared that incorporates appropriate actions contained in the existing Recreation Area Management Plan (RAMP) and the prescriptions for resources in Management Units 1, 4, 5, 6, and part of 15. Refer to maps in Appendix F for SRMA boundaries. Existing ROS settings would be continued for the Alpine Triangle SRMA.

Public lands in the Powderhorn Primitive Area SRMA, unit 2, would be managed for primitive and semi-primitive, non motorized recreation and scenic opportunities and for the maintenance and enhancement of natural values. A RAMP would be prepared and would include goals within BLM's Recreation 2000: A Strategic Plan.

The remainder of public lands, located in the Gunnison Extensive Recreation Management Area (ERMA), would be managed for a diversity of recreation opportunities. Potential recreation projects would be considered at Hartman's Rocks, Slate River, and High Mesa, and if proposed for development, these projects would be addressed in Recreation Project Plans.

Periodic cleanup and patrols would be conducted throughout the planning area. Commercial recreation

use permits would be issued on a case-by-case basis in the planning area.

Unless otherwise specified in management unit prescriptions, public lands in the planning area would be open to motorized vehicular travel. A map in Appendix F displays Off-Highway Vehicle (OHV) designations for the PRMP. Some roads would continue to be kept closed in the spring or other seasons until resource damage would likely not occur. Emergency road closures would occur if unacceptable resource damage occurs. The BLM would continue to recognize and respond to the need for seasonal closures by installing gates at key access points in problem areas.

Wild and Scenic River Study Segment. No portion of any stream in the Planning Area would be recommended as being suitable for designation and inclusion into the National Wild and Scenic Rivers System. Values and resources within the Study Segment A of The Lake Fork of The Gunnison River (see Appendix I), a segment the BLM found eligible, but not suitable, for inclusion into the National Wild and Scenic Rivers System, would be managed according to the prescriptions for Management Units 1, 4, and 15 and STANDARD MANAGEMENT.

Visual Resource Management. Public lands would be managed according to Visual Resource Management (VRM) classes and objectives contained in each Management Unit prescription. See Appendix C for general information about VRM classes and management objectives.

Rehabilitation would be considered for VRM Class II R, III R, and IV R areas that contain existing man-made visual intrusions. Any public lands designated wilderness would be classified as VRM I lands.

Wilderness Study Areas. The six WSAs in the Planning Area would be managed according to BLM's Interim Management Policy and Guidelines for Lands Under Wilderness Review until Congress decides on designation regarding each area. Any area(s) acted on by Congress and not designated as wilderness would be managed according to the applicable management unit prescription(s) in the

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PRMP. Wilderness Management Plans would be prepared for any area(s) designated and the area would be managed as wilderness. See the map in Appendix F for WSA boundaries and general locations. Appendix F shows also which WSAs occur in the various Management Units in the PRMP.

Archaeological and Historical Resources (Cultural Resources). Protection of cultural resources would be considered in all activity plans. Class I inventory data would be consulted prior to surface disturbing activities to determine the need for inventories. Prior to surface disturbing activities, Class III inventories would be conducted. Cultural resources identified or discovered would be evaluated using BLM's Cultural Resource Use Categories and/or would be mitigated as required by statute. Where appropriate, historic resources would be inventoried, stabilized, and interpreted to increase understanding and enjoyment for the recreating public, and to reduce safety hazards. Measures designed to protect, interpret, or otherwise enhance cultural resources would be included in all plans for surface disturbing activities. Avoidance would be the preferred method of protection. Inventories would also be conducted to determine archaeological site density, diversity, significance, and distribution in order to build a data base for management of archaeological resources. Cooperative and compatible management of historic sites with private landowners, and other federal agencies would continue.

Paleontological Resources. Inventories would be completed in areas containing potential for the occurrence of paleontological resources (Morrison, Dakota, Mancos, and Mesa Verde geologic formation) prior to any surface disturbing activity. Measures to protect known or discovered fossil values would be implemented.

Transportation and Access. In addition to the eleven specific access needs identified in the management unit prescriptions, the access needs identified in the Gunnison Resource Area transportation plan would be acquired as opportunities arise. The transportation plan map would be updated. Please refer to Appendix M for a list of the access needs specified in each unit.

Disposal of Public Lands. Public lands in the planning area would be classified into one of two categories for disposal and multiple use management purposes:

Category I lands: A total of 43 tracts of public land totalling approximately 3,120 acres would be identified for consideration for disposal through public sale under criteria in Section 203 of FLPMA. These tracts are shown on the map of the PRMP. Federal mineral estate would be conveyed with surface estate where feasible and in the public interest. See Appendix D for descriptions of tracts and the sale criteria met. Disposal determination would be contingent on these lands meeting NEPA and other statutory requirements. Other means of disposal for these tracts would not be precluded. A land sale/disposal activity plan would be prepared for these tracts indicating disposal techniques, priorities, and implementation timing.

Category II lands: These are public lands exclusive of public land in Category I. These category II lands would be identified to be managed by BLM for multiple use management purposes. The lands in this category would also be identified for consideration for disposal on a case-by-case basis through exchange, boundary adjustments, state indemnity selection, Recreation and Public Purpose Act applications, or other appropriate statute or authority, if disposal serves the public interest. These lands would not be identified for consideration for disposal through public sale as covered in Section 203 of FLPMA. These lands would be available for consideration for disposal through exchange if the exchange would result in 1) consolidated land patterns, 2) improved manageability of lands and resources, or 3) if the exchange would otherwise be in the public interest, within the context of the provisions of Section 206 of FLPMA. Disposal would be contingent on actions meeting NEPA requirements.

Acquisition of Non-Federal Lands: Non-federal lands surrounded by or adjacent to Category II lands or lands categorized as being unavailable for disposal, would be considered as being suitable for acquisition on a case-by-case, willing seller-willing buyer basis in order to enhance Bureau management. Acquisition

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would be contingent on these lands meeting 1) NEPA requirements and 2) one or more of the criteria for acquisition found in Appendix D. Specific tracts for acquisition are identified in management unit prescriptions.

Rights-of-Way. Public lands within the Planning Area would be open to the location of rights-of-way, subject to stipulations in Management Unit prescriptions and standard terms, conditions, and stipulations contained in records of decision issued for each application. Right-of-way avoidance areas (where future rights-of-way may be granted only when no feasible alternative route or designated right-of-way corridor is available) and right-of-way exclusion areas (where future rights-of-way may be granted only when mandated by law) are described in each management unit prescription, if applicable.

Rights-of-Way Corridors. Public lands within one-half mile on each side of the centerline of Western Area Power Administrations' (WAPA) Curecanti to Salida 230 Kv electrical transmission line, and Colorado Ute Electric Associations' (CUEA) Blue Mesa to Lake City 115 Kv electrical transmission line would be designated as rights-of-way corridors. The WAPA line crosses Management Units 8, 11, 12, 13, 14, and 16. A right-of-way window 1000 feet in width, or 500 feet either side of the centerline, would be designated where the WAPA line crosses Management Unit 8. The CUEA corridor crosses Management Units 1, 13, and 16. See map in Appendix D for the general locations of these corridors.

Fire Management. Wildfires on about 508,388 acres of public land would be suppressed according to a "conditional suppression" policy and about 76,624 acres of public land would be suppressed according to a "full suppression" policy. Refer to Appendix L for maps showing these suppression areas within the planning area for Management Units in the PRMP. Within conditional suppression areas there are isolated areas (i.e., public lands adjacent to private lands, or in recreation areas) where full suppression of wildfires would occur in order to protect valuable resources, investments, facilities, and property, life, and safety on federal and non-federal lands. Prescribed fires for resource enhancement or

fuel hazard reduction could occur throughout the Planning Area in accordance with approved prescribed burn plans. A site-specific burn plan and Environmental Analysis (EA) would be prepared prior to authorizing any prescribed burns.

Withdrawals and Classifications. Actions regarding Public lands currently under a withdrawal, reserve, or classification would be implemented according to the recommendations below. If public lands under withdrawal to another agency are relinquished, these lands would be managed according to Standard Management and the management unit prescription in which the lands are located. Periodic review of existing withdrawals would continue in order to determine if the need for each continues to exist. Management activities on all withdrawn land would continue at current levels, and would be consistent with the purposes of withdrawals.

1. The withdrawals affecting lands in the following existing Bureau of Reclamation (BofRec) and Federal Energy Regulatory Commission (FERC) withdrawals, and Bureau of Land Management Power Site reserves (BLM PSRs) located in the Planning Area adjacent to, or in close proximity to, the proposed boundary line of the Curecanti National Recreation Area (NRA) would be continued, and would be reviewed when Congressional action is taken regarding the exact boundary line location of the NRA. At that time, those withdrawn lands would be reviewed, and if not needed for NRA, BofRec, or FERC purposes, would be recommended to be relinquished or revoked, and managed according to the applicable Management Unit prescriptions. The acres affected by these withdrawals in the PRMP adjacent or in close proximity to the Curecanti NRA are approximately as follows:

BofRec Colorado River Reclamation Storage Project

C-014843 in Management Units 1, 7, 12, 13, and 16: 265 acres

C-021956 in Management Units 7, 9, 12, 13, and 16: 301 acres

C-0124366 in Management Unit 13: 42 acres

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BofRec Gunnison-Arkansas Reclamation Project

C-28255 in Management Units 1 (175 acres), 7 (7 acres), 12 (573 acres), and 16 (277 acres): 1,032 acres

BLM PSRs

No. 27, C-28590 in Management Units 7, 12, 13, and 16: 220 acres

No. 50, C-28588 in Management Units 13 and 16: 45 acres

FERC

Order of 11/9/1928 in Management Unit 16: 8 acres

2. The lands and approximate acres identified in the various withdrawals, classifications, or reserves below would be recommended to be continued, and would be periodically reviewed.

BLM protective withdrawals

C-17286, Powderhorn Primitive Area SRMA, in unit 2: 43,697 acres

C-0125423, "Loop Road" south and west of Lake City, in units 1, (675 acres), 4 (2 acres), and 15 (444 acres): 1,122 acres

Public Land Order (PLO) 4408, pending legislation transferring the affected lands in unit 16 to the United States Forest Service (USFS): 400 acres

C-014711, on Cebolla Creek in units 10 (269 acres) and 12 (164 acres): 433 acres

BLM Federal Water Reserves

C-17807, C-19375, C-19376, C-19377, and C-28514, located throughout all units except 5, 6, and 9; these water reserves would also be quantified: 25,900 acres

Federal Aviation Administration (FAA)

C-12613 (197 acres) and C-022844 (62 acres): 269 acres

USFS

C-0123890, at Soap Creek, in unit 13: 65 acres

C-28325, at Old Agency, in unit 16: 40 acres

BLM Recreation and Public Purposes Classifications (R & PPs)

C-15671, Lake City Ski Hill, Hinsdale County, in unit 1: 25 acres

Department of Energy Withdrawal Applications

The 330 acre Department of Energy (DOE) withdrawal for a potential mine tailings site in Management Unit 11 would be recommended to be continued. When DOE actions are finalized, some lands may be transferred to that agency. Any lands transferred would no longer be withdrawn or subject to BLM management. The need for the withdrawal would be reviewed periodically.

3. BLM would recommend that the lands in the following withdrawals or reserves be relinquished or revoked by the applicable agencies. Upon relinquishment, further action would be taken to terminate these withdrawals. Once terminated, the lands would then be managed according to the pertinent Management Unit prescriptions and Standard Management.

BofRec Gunnison-Arkansas Reclamation Project C-28255

In unit 1, T. 46 N., R. 3 W., paralleling the Lake Fork of The Gunnison River near The Gate Campground: approximately 1,040 acres

In Unit 12, T. 48 N., R. 6 W., paralleling the Little Cimarron River: approximately 840 acres

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In unit 16, T. 49 N., R. 34 W., Sec. 34:
NE1/4: approximately 160 acres

BLM PSRs

No. 50, C-28588, T. 50 N., R. 1 E., Sec. 4:
N1/2SW1/4SE1/4SW1/4: approximately 17
acres

USFS

C-010309, at Nine-Mile Hill, no longer
needed, in unit 13: 10 acres

FERC

C-0123435 in units 1 (630 acres) and 6 (95
acres) , and C-0124134 in units 1 (290 acres)
and 6 (5 acres), south of Lake City: 1,020
acres

4. The following BLM R & PPs and protective
withdrawal would be recommended to be revoked or
expanded in size:

R & PP C-083991:

At The Gate Campground, in unit 1, would
be revoked, upon a recommended five-acre
protective withdrawal taking effect at the
recreation area: 100 acres

R & PP C-012601:

At the Slumgullion Earthflow National
Natural Landmark ACEC. in unit 6, would
be revoked, upon a recommended
(approximately) 1,442 acre protective
withdrawal taking effect: 907 acres

BLM protective withdrawal C-17286:

At the Powderhorn Primitive Area SRMA, in
unit 2, would be expanded in size to include
an additional (approximately) 2,310 acres of
federal mineral estate, and 4,065 BLM
managed surface acres

5. The following new BLM protective withdrawals
would be recommended in various Management
Units:

Unit 1:

At the Mill Creek Campground: 20 acres

At the Red Bridge Campground: 5 acres

At The Gate Campground: 10 acres

The federal mineral estate in these lands
would be recommended to be withdrawn from
mineral entry and location, in order to protect
recreation values and improvements.

Unit 3:

In the Cochetopa Canyon SRMA:
approximately 2,597 acres of federal mineral
estate and 2,710 acres of BLM managed
surface acres would be recommended to be
withdrawn from mineral entry and location,
and all forms of appropriation under the
general land laws, in order to retain scenic,
riparian, and recreation values, but the
withdrawal would not effect the operation of
the general land laws regarding discretionary
leases, licenses, or permits

Unit 4:

In the American Basin ACEC, the federal
mineral estate would be recommended to be
withdrawn from mineral entry and location in
order to protect recreation and scenic values:
approximately 1,590 acres

Unit 6:

In the Slumgullion Earthflow National
Natural Landmark ACEC, the federal mineral
estate would be recommended to be
withdrawn from mineral entry and location in
order to protect the integrity of the earthflow:
approximately 1,442 acres

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Unit 9:

In the Dillon Pinnacles ACEC, the federal mineral estate would be recommended to be withdrawn from mineral entry and location in order to protect scenic and recreation values: approximately 530 acres

Waterpower and Storage Reservoir Sites. Management Units 1, 3, 10, 14 and 15 would be recommended to be closed to the development of water power and storage reservoir sites. The remainder of the inventoried and potential sites would be managed to permit water and power site development unless another use is proposed for the site(s) in a Management Unit prescription. Before any uses occur or facilities are developed on lands withdrawn for water power purposes, that would preclude or conflict with waterpower or storage development, the Federal Energy Regulatory Commission would be contacted regarding withdrawal status and need for the site.

Areas of Critical Environmental Concern. Public lands in six Management Units, 4 through 9, totalling approximately 42,339 acres, would be designated as Areas of Critical Environmental Concern (ACECs). These six areas (American Basin, Redcloud Peak, Slumgullion Earthflow National Natural Landmark, West Antelope Creek, South Beaver Creek, and Dillon Pinnacles) would be managed according to their Management Unit prescriptions and any management plans that would be prepared. Haystack Cave and Sapinero potential ACECs are contained within the recommended West Antelope Creek ACEC. Values within the remaining eight potential ACECs described in Table H-2 (Alpine, Powderhorn, East Gunnison, Lake Fork Canyon, Bighorn Sheep A and B, Cebolla Creek, and Loop Road) in Appendix H would be sufficiently protected and managed by the actions in applicable Management Unit prescriptions. Refer to Appendix H for descriptions and maps of these areas and the ACEC designation process. Table H-1 in Appendix H lists the areas that were nominated early in the planning process, but did not pass the screening process for further consideration in the DRMP.

Hazards Management. Hazard sites or areas would be reviewed on a case-by-case basis and remedied to the degree necessary to protect public safety and health. Activity plans would consider the remediation of known hazards. Management of other resources would involve reclamation/remediation of known hazard sites/areas as part of fulfilling objectives for management of that resource.

Coordination and cooperation with appropriate state or other agencies to remedy hazard sites would continue. Existing sites/areas from past mineral development, which are considered to be potentially hazardous because of high side walls, deep pits, etc., would very likely continue until the Colorado Mined Land Reclamation Hazard abatement project is completed. The goal of this long-term project is to eliminate the hazards of these sites/areas.

Hazardous Materials Management. Locations on public lands showing evidence of hazardous materials would be inventoried and examined on a case-by-case basis, and remedied to the degree necessary to protect public health, safety, and public or private property. Coordination and cooperation with appropriate state or other agencies to properly manage hazardous materials would continue. Trespass dumping and littering on public lands would be controlled through public awareness, signing, and monitoring.

Law Enforcement. Bureau patrols and law enforcement activities by authorized personnel would be conducted on a priority or demand basis as needed. Information dissemination and education regarding BLM resource management and regulations would be carried out during visitor or public contacts by BLM rangers.

MANAGEMENT UNIT PRESCRIPTIONS FOR THE PROPOSED RESOURCE MANAGEMENT PLAN (1-16)

According to the BLM's basic legislation, any particular land area and its resources may have the potential for a variety of uses, some of them mutually exclusive. The BLM's major objective is to manage the public lands under a multiple-use philosophy and

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to provide maximum public benefits through the best combination of uses for which an area is capable.

Under the Proposed Resource Management Plan (PRMP), the planning area has been divided into management units based on the resources, uses, and values of the public lands within a particular geographic area and relative to the goals and objectives of the PRMP. Management Unit prescriptions for the PRMP are derived from the Preferred Alternative (Alternative E) of the DRMP, with changes made as a result of public comment and internal review. Please refer to the **CHANGES TO THE PREFERRED ALTERNATIVE** section in Chapter Two for the changes that have been incorporated into the PRMP. The size, number, and configuration of the Management Units in the PRMP is very similar to those in the Preferred Alternative (Alternative E) of the DRMP, with the only exceptions being minor changes in units 14 (+1.1 miles) and 15 (-.6 miles). Some adjacent units were correspondingly affected as a result of these additions or deletions. The presence or absence of these segments was discussed and analyzed in alternatives in the DRMP. Table 4-1 lists the acres in each Management Unit in the PRMP. The map that is inserted into this document displays the Management Units and general land status in the PRMP. Differences in acres within units in the PRMP and the Preferred Alternative in the DRMP are the result of the unit changes mentioned above or the peculiarities of the GIS system used. Boundaries are the same, with the exception of the changes noted above in units 14 and 15, and the adjacent units.

Although each management unit would be managed under the multiple-use concept, its most outstanding resources, uses, or values would be given significant consideration to protect those specific qualities. In recognition of this potential for loss or impact, management unit prescriptions may place constraints on opposing/competing resources, uses, or values within a unit. In most cases, these other resources would be managed to the extent that such management would be compatible with the more significant resources, uses, or values in a unit. In addition, future proposals would be evaluated in the context of the management prescriptions for units.

Public lands within the planning area where no particular resource, use, or value is outstanding, and where management would be minimal, are considered to be general resource management units.

The following management unit prescriptions comprise The PRMP. Acreage figures used are approximations. Table 4-1 and the PRMP map identify the management units that were delineated for the PRMP. Six Management Units, 4 through 9, totalling 42,339 acres would be designated and managed as ACECs. *If not specifically mentioned, and unless modified within the following Management Unit prescriptions, resources/resource uses and programs on public lands in the PRMP would be managed according to guidance in the Standard Management section above.*

In this PRMP, all Wilderness Study Areas (WSAs) in the Planning Area would be managed under BLM's Wilderness Interim Management Policy for Lands Under Wilderness Review (IMP). If Congress designates public lands in any part of any WSA in the Planning Area as wilderness, those lands would be managed as wilderness and a wilderness management plan would be prepared for the area(s). If, during the life of this plan, Congress acts on and decides to not designate any part of any WSA in the Planning Area as wilderness (effectively removing it from WSA status), those public lands would be managed according to the actions in the Management Unit prescriptions below for the PRMP. Appendix F shows WSA maps and tables depicting Management Unit locations of WSAs.

MANAGEMENT UNIT 1 (Part of Alpine Triangle SRMA)

Land ownership: 95,827 acres of public surface; 15% of the Planning Area.

This management unit is currently managed as the Alpine Triangle Special Recreation Management Area (SRMA), and consists of the bulk of the SRMA. The unit extends south along the Lake Fork of the Gunnison River (Lake Fork) from the Curecanti National Recreation Area (NRA) and includes lands south and west of Lake City. This unit surrounds

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three recommended ACECs (4, 5 and 6) and important fisheries and riparian zones (parts of 15).

The lands south and west of Lake City are characterized by 13,000-14,000 foot peaks, fragile high-country tundra, important mining-era historical resources, summer range for domestic sheep grazing, heavy recreation visitation, and high quality scenic values. This unit is the most popular and heavily visited area BLM manages in Colorado, and is among the most scenic areas in the nation. Features within or adjacent to the unit include structures associated with the historic mining period, an 8.9 mile-long portion of the Segment A of the Lake Fork of the Gunnison River, a study segment eligible for inclusion into the National Wild and Scenic Rivers System, Mill Creek Campground, populations of the rare Uncompahgre fritillary butterfly, the Alpine Loop National Backcountry Byway, Slumgullion Earthflow National Natural Landmark, and bighorn sheep habitat.

The lands along the Lake Fork from Lake City downstream to the NRA boundary are characterized by a steep-walled, narrow canyon and a meandering river valley with a variety of vegetation types. Intermingled land ownership occurs in this part of the unit. Features in this part of the unit include high quality visual resources, nine recorded historic railroad construction camp sites (three of which have been developed and are managed cooperatively by the National Park Service), various other historic sites, the Gate and Red Bridge campgrounds, several BLM minor wayside and fishing access improvements; crucial big game winter range; bighorn sheep habitat and a bighorn sheep herd; and a 69 Kv electrical transmission line.

Concerns include potential impacts on fragile tundra ecosystems receiving heavy recreation use, visitor safety concerning high altitudes and open mine shafts, degraded visual quality, incompatible recreation, mining, and livestock grazing land use mixes, motorized vehicle use, access and management, vandalism, survey and inventory/recordation deficiencies, and other concerns associated with fragile historic structures. Concerns also exist regarding potential disease transfer to bighorn sheep from grazing domestic sheep and a growing demand for public access to the Lake Fork.

The unit would continue to be managed as part of the existing Alpine Triangle SRMA. Providing a diversity of recreation opportunities, including interpretation, while protecting important historic, scenic, and natural values would be emphasized within the unit. Motorized recreation sightseeing, hiking, camping, winter recreation, hunting, fishing, floatboating, and other recreation opportunities would be emphasized. A CRMAP would be prepared for the unit and the SRMA, incorporating the management actions in the existing RAMP, Recreation 2000 goals and the back country byway, the Alpine Loop Cultural Resource Management Plan (CRMP), historic site management, visual resource management, and other resources in this and all other Management Units in the Alpine Triangle SRMA. Plans for surface-disturbing activities, including recreation use and development, would contain measures designed to minimize negative effects to resources, especially those that could impact adjacent recreation or scenic resources and fisheries and riparian habitat. Public lands would be managed for a combination of Primitive, Semi-Primitive Motorized, Semi-Primitive Non-Motorized, Roaded Natural, and Rural ROS settings as contained in the existing RAMP for the SRMA.

Management actions contained in the existing RAMP for the unit would be implemented (facility and trail development, improvement, and maintenance, expanded recreation area administration and visitor services, additions to and maintenance of OHV routes, signing, patrols, and commercial recreation use supervision). Trail access to the Powderhorn Primitive Area SRMA would be located and constructed. Construction of a joint BLM/USFS visitor and administrative center in Lake City would be pursued. Overnight camping would be excluded within 50 feet of historic resources on public land. A follow-up visitor-use survey would be conducted in approximately 1994 to reassess the activities, settings, and experiences favored by the recreating public. If feasible, facilities at The Gate and Red Bridge Campgrounds would be upgraded and added such that entrance fees could be charged.

Historic sites would be inventoried, recorded, and evaluated within the unit, and determinations of eligibility prepared. The Alpine Loop CRMP would be prepared to direct the development, maintenance,

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stabilization, and interpretation of these appropriate historic resources for passive, non-consumptive recreation opportunities. This plan would be incorporated into the CRMAPP for the unit. Interpretation would emphasize the protection of historic sites, buildings, and facilities in order to prevent vandalism. Cadastral surveys would be conducted, if necessary, for sites to determine public land locations for historic sites with potential for stabilization or interpretation.

Cooperative management with the NPS on lands along the Lake Fork of the Gunnison River from Red Bridge to Blue Mesa Reservoir would be continued for recreation facility and road maintenance, and the interpretation and protection of three historic railroad camp/construction sites. If appropriate, cooperative management of other sites would be considered.

Motorized vehicular traffic on public lands within the unit south of the north line of Section 12, T. 45 N., R. 4W., N. M. P. M., would be limited to designated routes, and snowmobile use would be limited to travel on snow. When the CRMAPP is prepared for the Alpine Triangle SRMA, a map would be included and areas defined on the ground delineating appropriate pull-off and parking areas adjacent to designated routes. The remainder of the unit would be open to OHV traffic.

Federal mineral estate in the following areas in the unit would be withdrawn from mineral entry and location under the general mining laws: (a) within 675 acres in the existing protective withdrawal (C-0125423) along the Alpine Loop National Backcountry Byway, in order to protect scenery within the byway from mining disturbance, (b) a total of five acres at Red Bridge Campground in order to prevent disturbance from mining activities occurring at the recreation site, (c) a total of 10 acres at The Gate campground to protect recreation facilities, and (d), 20 acres at the Mill Creek Campground.

Federal oil, gas, and geothermal estate totalling 675 acres within the existing protective withdrawal (C-0125423) along the Alpine Loop National Backcountry Byway would be open to leasing with a no surface occupancy stipulation in order to protect recreation facilities and visual resources from fluid minerals exploration and development. Mineral

material disposal on federal mineral estate on these same lands would not be authorized for the same reasons.

Wildlife Habitat Management. Disposal of mineral materials on 10,620 acres of federal mineral estate within crucial big game winter range would not be authorized from December 1 through April 30 to prevent disturbance to wintering deer and elk.

Livestock Grazing Management. Livestock grazing would continue to be authorized in the unit within the capabilities of the ecosystems involved. On public lands within the riparian area along Henson Creek, from the North fork of Henson Creek downstream to Lake City, livestock grazing in this important fishery would continue not be authorized in order to maintain stream and streamside conditions, including soils and vegetation.

Wild and Scenic River Study Segment. The 8.9 mile-long portion of Segment A of the Lake Fork of the Gunnison River, a segment BLM found eligible, but not suitable, for inclusion into the National Wild and Scenic Rivers System, would be managed according to this prescription and STANDARD MANAGEMENT for the PRMP. Please refer to Appendix I for the eligibility and suitability analysis, and for location and boundary maps of the segment. The segment was determined to be eligible, but not suitable, for inclusion into the NWSRS.

Visual Resource Management. The unit would be managed according to VRM Class II (93,848 acres), VRM Class III (165 acres) and VRM Class IV (1,337 acres) objectives.

Transportation and Access. Administrative access would be acquired into the east-central part of the unit that includes Yaeger Gulch and Skunk and Trout Creeks for commercial forest management. Public hiking and horse access would be acquired into the Alpine Gulch drainage for recreation and livestock grazing management. Public access would continue to be acquired, as opportunities arise, to BLM and USFS managed lands between Lake City and Red Bridge campground.

Acquisition of Non-Federal Lands. If available, selected non-federal lands necessary for management,

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protection and/or enhancement of recreation and visual resources and wildlife habitat on public lands would be acquired. If available, selected non-federal lands containing representative examples of thematic historic period sites, structures, or resources would be acquired through exchange or purchase.

Rights-of-Way. About 3,840 acres in the rights-of-way corridor would be open to development of all rights-of-way. With the exception of public lands in the rights-of-way corridor, the entire unit would be closed to the development of above-ground utilities (91,510 acres). Public lands north of the south line of Sections 16 and 17, T. 47 N., R. 3 W., N.M.P.M., approximately 2,560 acres, and about 76,880 acres south and west of Lake City would be classified an avoidance area for all other rights-of-way. The remainder of public lands in the unit, about 12,070 acres, would be open to all other rights-of-way. See Appendix D for a map showing these areas.

Rights-of-Way Corridors. Approximately 3,840 acres of public land along CUEA's Blue Mesa to Lake City 115 Kv electrical transmission line would be designated a rights-of-way corridor (see Standard Management for more detail).

Fire Management. Full suppression of wildfires would occur on 9,577 acres of public land to protect private property, BLM recreation sites, and other facilities. Conditional suppression would occur on 85,773 acres.

Withdrawals and Classifications. The R&PP classification C-012620 would be terminated or revoked near the Slumgullion Earthflow National Natural Landmark proposed ACEC, Unit 6, upon withdrawal recommendations being implemented within that unit. The R&PP classification C-15671 (approximately 25 acres) for a ski facility near Lake City would continue. The 100 acre R&PP classification C-083991 would also be terminated or revoked at The Gate Recreation Area upon withdrawal recommendations being implemented. The Bureau of Reclamation withdrawal C-28255, affecting approximately 1,040 acres of public land surrounding The Gate Campground would be recommended for relinquishment to ensure recreation

resources would not be inundated. The part of the BLM protective withdrawal C-0125423, 675 acres, along the back country byway in the unit would be continued. Approximately 10 acres of public land at The Gate Campground, approximately 5 acres of public land at Red Bridge campground, and 20 acres of public lands at the Mill Creek Campground would be withdrawn from all forms of appropriation under the general land laws for protection of recreation resources and BLM investments.

Water Power and Storage Reservoir Sites. The unit would be recommended to be closed to the development of potential water power and storage reservoir sites.

MANAGEMENT UNIT 2 (Powderhorn Primitive Area SRMA)

Land Ownership: 47,762 acres of Public Surface; 8% of the Planning Area.

This unit consists of lands managed for primitive, non-motorized recreational and natural values.

This management unit is managed as the existing Powderhorn Primitive Area Special Recreation Management Area (SRMA). The entire existing Powderhorn Primitive Area is located within the unit. Few obvious human influences are apparent. The unit contains the popular Powderhorn Lakes and is characterized by a diversity of landscapes, high valued recreation resources, important fishery and riparian resources, and scenic and natural values. Livestock grazing occurs in part of the unit. Bighorn sheep habitat occurs within the unit. The BLM surface estate within the existing primitive area is withdrawn from all forms of appropriation under the general land laws (C-17286) and from mineral entry and location under the general mining laws. A concern for resources within the unit is that concentrated recreation use occurring along existing trails and at the lakes area could potentially result in unacceptable impacts to scenic and other resources. Another concern is the potential for diseases being transferred to bighorn sheep from domestic sheep. The need to protect both the high quality and diversity of scenic, recreation, and other natural values, while reducing effects of recreation use would

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be recognized as important during the formulation of management decisions affecting the area.

The unit would be managed as the Powderhorn Primitive Area SRMA. The Primitive Area would be expanded to include the remainder of public lands in the unit.

A Recreation Area Management Plan (RAMP) would be prepared emphasizing the enhancement of natural values and primitive recreation opportunities. Public lands would be managed for Primitive and Semi-Primitive Non-Motorized ROS settings.

Measures to prevent soil erosion and water quality deterioration processes would be allowed to occur and surface-disturbing activities would be minimized. Commercial recreation use would be permitted and use levels established, if necessary, to maintain natural values in the unit; and commercial permits would contain stipulations and mitigation for vegetation and surface disturbance. A permit system and recreation use levels for private, non-commercial recreation use would be established and implemented in the unit if adverse environmental impacts result from recreation activities. Maps and interpretive brochures would be distributed to help inform users of low-impact camping skills. Trail access in the unit from the Devil's Creek area would be located and constructed. Trails and other facilities would be maintained periodically.

Public Lands in the unit would be closed to motorized vehicular traffic, unless otherwise authorized, to protect and maintain primitive recreation opportunities. The unit would also be closed to mountain bikes.

The entire federal mineral estate in the unit, 46,007 acres, would be withdrawn from mineral entry and location under the general mining laws. This includes approximately 2,310 acres of federal mineral estate not now withdrawn. The federal oil and gas estate in the unit would be closed to future leasing in order to protect recreation and natural values. Disposal of mineral materials would not be authorized on federal mineral estate in the unit.

Wildlife Habitat Management. Fishery or other wildlife improvement projects or project maintenance, would be permitted only if compatible with the objectives of this unit. If the lands in the unit are acted upon by Congress for wilderness designation, and are not designated, lands in the unit would be evaluated and considered for moose introductions, which could be authorized by the District Manager following environmental analysis. The BLM's Interim Management Policy and Guidelines for Lands under Wilderness Review and a national-level agreement involving BLM prevents the introduction of moose or other non-indigenous species into public lands in Wilderness Study Areas or Wilderness areas.

Livestock Grazing Management. Domestic sheep grazing in grazing allotment 6112 would not be authorized in the unit in order to help prevent the potential for diseases being transferred to bighorn sheep from domestic sheep. Cattle grazing would be authorized and administered in the unit such that recommended ROS settings would be maintained. Vegetation treatments or improvements and treatment maintenance would be authorized if compatible with the objectives of this unit. Livestock grazing along 2.2 miles of Fourth of July Creek, 10.2 miles of the East Fork of Powderhorn Creek, 8.3 miles of the Middle Fork of Powderhorn Creek, and 8.7 miles of the West Fork of Powderhorn Creek would be managed to maintain a 4-inch minimum stubble height for key forage species, during the grazing period of use, in these riparian zones containing important fisheries. The stubble height requirement would be implemented according to the Livestock Grazing Management section of STANDARD MANAGEMENT. This action is recommended in order to improve and maintain stream and streamside conditions, including soils and vegetation.

Forest Management. The unit would be closed to the sale or harvest of forest products in order to maintain scenic and recreation values.

Visual Resource Management. Public lands would be managed according to VRM Class I objectives in order to maintain the scenic quality of the unit.

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Acquisition of Non-Federal Lands. If available, 40 acres of private surface estate would be acquired. The acquisition of state-owned minerals in the unit would be pursued.

Rights-of-Way. Public lands in the unit would be classified an exclusion area for future rights-of-way.

Fire Management. Public lands in the unit would be managed under the conditional suppression category.

Withdrawals and Classifications. Public surface estate in the unit, approximately 47,762 acres, would be withdrawn from all forms of appropriation under the general land laws in order to retain the lands in public ownership. Bureau protective withdrawal C-17286 would be continued and expanded to include these lands, and also approximately 46,007 acres of subsurface federal mineral estate in the unit. This would include approximately 4,065 surface acres and about 2,310 acres of federal mineral estate not now withdrawn.

MANAGEMENT UNIT 3 (Cochetopa Canyon SRMA)

Land Ownership: 2,710 acres of Public Surface; less than 1% of the Planning Area.

This unit consists of lands managed for day-use and overnight recreation along Cochetopa Creek.

Most of the public lands in this management unit are currently managed as the Cochetopa Special Recreation Management Area (SRMA). Resources and land uses are managed according to an existing activity plan for the unit. Colorado State Highway 114 traverses the unit, which is characterized by a steep, scenic canyon that restricts recreation use to the narrow riparian corridor along Cochetopa Creek. Day-use recreation such as sight-seeing, fishing, and picnicking, and overnight camping occur within the unit. Features within the unit include high-quality scenic resources, three semi-developed, and three undeveloped recreation sites. An elk calving area, Cochetopa Creek--an important fishery--and crucial big game winter range and bighorn sheep habitat occur within the unit. Concerns within the unit

include a lack of recreation signing, general vandalism, and adverse impacts from recreation use to soils, vegetation and water quality, and deteriorating recreation facility conditions.

The unit would continue to be managed according to the existing RAMP. The RAMP would be updated to include this expanded SRMA and prescription. The management objectives for the unit would be to continue to provide and improve the existing diversity of recreation opportunities, with fishing and overnight camping adjacent to Highway 114 being emphasized. Recreation facilities at three semi-developed and three undeveloped recreation areas would be constructed and maintained to provide approximately 32 family campsites, 6 toilets, twenty parking spaces, and informational signing. Existing recreation facilities in the unit would be maintained. Periodic patrols would be conducted. Recreation use would be monitored and possibly restricted as necessary to protect natural features and recreation opportunities. Informational and interpretive signs would be installed. Public lands would be managed for a Roaded Natural ROS setting.

The federal mineral estate within the unit, 2,592 acres, would be withdrawn from mineral entry and location under the general mining laws in order to provide protection for visual and recreation resources. This area has a low to moderate potential for the occurrence of mineral resources.

The entire Federal oil, gas, and geothermal estate in the unit, 2,592 acres under federal surface, would remain open to leasing with a no-surface occupancy stipulation in order to protect scenic and recreation resources in the narrow canyon in this unit.

Wildlife Habitat Management. Disposal of mineral materials on 1,317 acres of federal mineral estate in the unit within elk-calving areas would not be authorized in order to prevent disturbance to calving elk from April 16 through June 30. Mineral material disposal would not be permitted on 2,302 acres of federal mineral estate from December 1 through April 30 within big game crucial winter range in order to prevent disturbance to wintering deer and elk.

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Livestock Grazing Management. Livestock grazing and watering would not be permitted in the riparian area along Cochetopa Creek in order to maintain or improve riparian and/or fishery conditions. Domestic sheep grazing would not be authorized throughout the unit to prevent disease transfer to domestic sheep.

Visual Resource Management. The unit would be managed according to VRM Class II (2,220 acres) and VRM Class IV (487 acres) objectives.

Rights-of-Way. Public land in the unit would be classified an exclusion area for above-ground utility rights-of-way. Underground utility rights-of-way and development would be limited to disturbed areas associated with existing roads.

Fire Management. Wildfires would be managed under the full suppression category.

Withdrawals and Classifications. Public surface estate in the unit, approximately 2,710 acres, would be recommended to be withdrawn from all forms of appropriation under the general land laws in order to retain scenic, riparian, and recreation values. This withdrawal would not affect the application of the public land laws governing the use of lands under discretionary leases, licenses or permits. The federal mineral estate within the unit, 2,592 acres, would be recommended to be withdrawn from mineral entry and location under the general mining laws in order to provide protection for visual and recreation resources. This area has a low to moderate potential for the occurrence of mineral resources.

Water Power and Storage Reservoir Sites. The unit would be recommended to be closed to the development of potential water power and storage reservoir sites.

MANAGEMENT UNIT 4 (American Basin ACEC)

Land Ownership: 1,597 acres of Public Surface; less than 1% of the Planning Area

This management unit is located south and west of Lake City between the Continental Divide and Handies Peak, and is one of the most scenic basins in the San Juan Mountains because of its midsummer

wildflowers and the high-quality visual resources. Sloan Lake and approximately two and one-half miles of the headwaters of Segment A of the Lake Fork of the Gunnison River, a study segment eligible for inclusion into the National Wild and Scenic Rivers System, are located within the unit. The unit is also managed as part of the Alpine Triangle SRMA. Concerns within the unit are conflicts regarding recreation users and domestic sheep grazing and the potential for mining to occur (there is a high to moderate likelihood for the occurrence of locatable minerals on public lands in the unit).

The unit would be designated and managed as the American Basin Area of Critical Environmental Concern (ACEC) within the SRMA. The unit would be managed to protect and enhance visual and other natural resources and existing related recreation opportunities. Activities resulting in surface disturbances or visual impacts would not be permitted in order to prevent deterioration of scenic values. Specific and detailed management for this ACEC would be included as part of the CRMAP to be prepared for unit 1.

The entire federal mineral estate within the unit, totalling about 1,590 acres, would be withdrawn from mineral entry and location under the general mining laws in order to protect recreation and visual resources in the unit from disturbance from possible mineral development.

The entire federal oil and gas estate within the unit, totalling 1,590 acres, would be open to future mineral leasing with a no surface occupancy stipulation in order to protect visual and recreation resources from deterioration as a result of possible oil and gas exploration or development. Disposal of mineral materials on federal mineral estate would not be permitted within the unit for the same reasons.

Livestock Grazing Management. Domestic livestock grazing would be administered in such a manner as to avoid conflicts between recreation visitors and grazing livestock. Livestock management objectives would be to maintain recreation and scenic values, especially during the wildflower display and peak visitation periods. Specific livestock grazing management for the unit

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would be incorporated into the overall activity plan for Management Unit 1, and could include season of use changes, restrictions in areas that could be grazed, or possibly elimination of grazing in some areas.

Recreation Management. Motorized vehicular travel would be limited to designated routes within the unit in order to prevent destruction to wildflower concentrations and visual resources in general. Public lands would continue to be managed for Semi-Primitive Motorized and Semi-Primitive Non-Motorized ROS settings, according to the RAMP for the Alpine Triangle SRMA. The hiking trail to Handies Peak would be maintained. Interpretive signing would be installed at appropriate locations in American Basin and, in addition to other interpretation, would explain livestock management objectives in the unit.

Wild and Scenic River Study Segment. The 2.5 mile-long Segment A of the Lake Fork of the Gunnison River, a segment BLM found eligible, but not suitable, for inclusion into the National Wild and Scenic Rivers System, would be managed according to this prescription and STANDARD MANAGEMENT for the PRMP. See Appendix I for eligibility and suitability determinations, and for maps of boundaries of the segments.

Visual Resources. Public lands would be managed according to VRM Class I objectives in order to maintain the natural setting in the unit. Existing visual intrusions would be rehabilitated to the extent possible.

Transportation and Access. One of two parallel roads that resulted from a detour would be closed and rehabilitated; the best located road would be retained for recreation access and would be maintained periodically to prevent resource impacts.

Acquisition of Non-Federal Lands. If available, approximately 40 acres of non-federal lands would be acquired in the unit in order to enhance and facilitate the management of visual and recreation resources.

Rights-of-Way. Public lands in the unit would be classified as an exclusion area for rights-of-way.

Fire Management. Wildfires in the unit would be managed under the conditional suppression category.

Withdrawals and Classifications. The entire federal mineral estate in the unit, 1,590 acres, including within the existing BLM protective withdrawal C-0125423 along the backcountry byway (about 2 acres), would be withdrawn from mineral entry and location to protect recreation and scenic resources.

MANAGEMENT UNIT 5 (Redcloud Peak ACEC)

Land Ownership: 5,960 acres of Public Surface; 1% of the Planning Area

This unit is located southwest of Lake City within the boundary of the Alpine Triangle SRMA. The unit contains one of two known viable breeding populations of the Uncompahgre fritillary butterfly, an endangered species. A research effort by a national university is on-going regarding the butterfly. The 14,000 foot-plus Redcloud Peak is within this unit characterized by fragile high-country tundra. Other features within the unit are highly scenic visual resources and bighorn sheep habitat. Domestic sheep grazing is authorized within a part of the unit. The unit has a moderate to high potential for the occurrence of locatable materials. Concerns within the unit include fragile tundra that receives heavy recreation use and trampling of habitat of the Uncompahgre fritillary butterfly by domestic sheep.

The unit would be designated and managed as the Redcloud Peak Area of Critical Environmental Concern (ACEC). Protection and enhancement of habitat of the Uncompahgre fritillary butterfly and the species in the unit would be emphasized. Specific management of resources in the ACEC would be incorporated into the CRMAP to be prepared for the Alpine Triangle SRMA.

On-going efforts in research, monitoring, and inventory would continue and be expanded as needed. Surface disturbing activities would be restricted to protect the endangered species and existing and potential habitat of the species. Research or collecting would require authorization by BLM and the USF&WS.

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The entire federal oil, gas, and geothermal estate in the unit, totalling 5,962 acres, would be open to leasing with a controlled surface use stipulation, and mineral material disposal would not be permitted in the unit in order to protect habitat of the Uncompahgre fritillary butterfly and the species. Please refer to Appendix K for the controlled surface use stipulation requirements within this unit.

Livestock Grazing Management. On public lands within the unit, domestic sheep grazing would be controlled to prevent destruction of Uncompahgre fritillary butterfly habitat.

Recreation Management. Motorized vehicular travel would be limited to designated routes, unless otherwise authorized, in order to protect habitat of the Uncompahgre fritillary butterfly. Public lands would continue to be managed for Semi-Primitive Non-Motorized and Primitive ROS settings, according to the Alpine Triangle RAMP.

Visual Resources. Visual resources would be managed according to VRM Class II objectives in order to maintain the natural setting in the unit.

Rights-of-Way. Public lands in the unit would be classified an avoidance area for rights-of-way.

Fire Management. Wildfires in the unit would be managed under the conditional suppression category.

MANAGEMENT UNIT 6 (Slumgullion Earthflow National Natural Landmark ACEC)

Land Ownership: 1,405 acres of Public Surface; less than 1% of the Planning Area

This unit is located approximately 2 miles southeast of Lake City and contains part of the Slumgullion Earthflow National Natural Landmark, a mass wasting phenomenon. A Recreation and Public Purposes (R&PP) classification (C-0126201) applies to part of the public lands in the unit.

The unit is located within the Alpine Triangle Special Recreation Management Area (SRMA). The Colorado Natural Areas Program has designated most of the public lands in the unit as a Colorado Special

Interest Area. The unit contains approximately 270 acres of crucial elk and deer winter range.

The unit would be designated and managed as the Slumgullion Earthflow National Natural Landmark Area of Critical Environmental Concern (ACEC). Surface disturbance within the unit would not be permitted in order to enhance and protect the natural values within the earthflow, including visual resources. Specific management for resources in the ACEC, including interpretation of the earthflow and other natural values in the unit would be included in the CRMAP to be prepared for the Alpine Triangle SRMA.

The entire federal mineral estate within the unit totalling 1,442 acres, would be withdrawn from mineral entry and location under the general mining laws in order to protect the integrity of the earthflow from mineral development. The area has a high to moderate potential for the occurrence of locatable mineral resources.

The entire federal, oil, gas, and geothermal mineral estate within the unit, 1,397 acres under federal surface and 45 acres of split estate, would be open to leasing with a no surface occupancy stipulation in order to protect values associated with the earthflow. Disposal of mineral material on 1,397 acres of federal mineral estate in the unit would not be permitted within the unit for the same reason.

Forest Management. Timber harvesting would not be permitted in the unit.

Recreation Management. Motorized vehicular traffic in the unit would be limited to designated routes in order to prevent surface disturbance within the slide area.

Visual Resource Management. The unit would be managed according to VRM class II objectives.

Rights-of-Way. Utility rights-of-way would not be allowed in the unit except for buried utilities along an eight-acre corridor where Highway 149 crosses the unit.

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Fire Management. Wildfires on about 1,060 acres of public lands would be managed according to a conditional suppression policy and about 347 acres would be managed according to a full suppression policy.

Withdrawals and Classifications. The entire federal mineral estate in the unit would be withdrawn from mineral entry and location in order to protect the earthflow from disturbances related to future locatable mineral activities. The R&PP classification C-0126201 would be recommended for termination or revocation upon implementation of the withdrawal recommendation.

MANAGEMENT UNIT 7 (West Antelope Creek ACEC)

Land Ownership: 28,275 acres of Public Surface; 5% of the Planning Area.

This management unit is generally bounded on the south and west by the Curecanti National Recreation Area, on the north by the Gunnison National Forest, and on the east by West Antelope Creek. The unit contains big game crucial winter range, the greatest concentration of wintering elk and deer in the planning area; bald eagle habitat, the Dillon Mesa bighorn sheep herd, and the Colorado Division of Wildlife Sapinero State Wildlife Area (the first tract of land purchased under the Pittman-Robertson Act in Colorado). Much of the elk and deer crucial winter range in the unit is characterized by fairly gentle terrain (sparsely vegetated, and dissected by narrow, shallow drainages) that results in long sight distances and few sound barriers that could serve as buffers. The unit receives extensive recreational hunting use, and contains crucial big game winter range important in maintaining huntable populations in the planning area on 26,157 acres of public lands. An elk-calving area occurs in the unit. The unit contains lands critical to early spring and summer livestock grazing. A 115 kv electrical transmission line is located in the southern part of the unit.

A major concern within the unit is that CDOW long-range elk and deer herd goals have reached or are beyond the carrying capacity in uplands and riparian areas, and attaining lower numbers in the

next five years would be in the best interest of the habitat. Improper livestock grazing along North Willow Creek is a concern within that riparian area, along with the lack of administrative access into that watershed. Other concerns regarding elk and deer and their habitat are private land development within crucial winter ranges, the extent and distribution of palatable shrub browse species, vegetative/land treatments that remove winter browse, and disturbances and human activity during critical periods within crucial winter ranges. Another concern is that the bighorn sheep herd appears to be static and below herd goal numbers.

The unit would be designated and managed as the West Antelope Creek Area of Critical Environmental Concern (ACEC). A CRMAP would be prepared, and would include management actions within the recommended Dillon Pinnacles ACEC, unit 9. The area would be managed to improve the capabilities of the resources in the unit to support wintering elk, deer, and bighorn sheep. All other land uses, except as specified below, would be permitted if they would not degrade the quality of the winter range in the unit. Surface-disturbing activities on public lands would not be permitted from December 1 through April 30 on crucial elk and deer winter range. Within the first five years following designation, recommendations would be made to CDOW to manage total numbers of elk and deer on crucial winter range so as to improve the production and vigor of important browse species and to increase the winter range carrying capacity. Refer to Table A-4 in Appendix A for these interim herd goal numbers that would be recommended for BLM-managed lands. The habitat thereafter on BLM-administered lands would be managed to achieve CDOW's long-range herd goals, within carrying capacities of the habitat.

Federal oil and gas estate totalling 126 acres under federal surface within 1/4 mile radius of sage grouse lek sites would be open to leasing with a no surface occupancy stipulation to prevent disturbance to lek sites and strutting sage grouse. The BLM would, if necessary, through negotiations with operators or lessees, seek to obtain rescheduling of oil and gas related activities within federal oil and gas estate (26,112 acres under federal surface and 8,365 acres of split estate) on crucial big game winter range from

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December 1 through April 30 to prevent disturbances to wintering elk and deer, and to help maintain herd viability in this ACEC. This rescheduling could be in addition to the 60-day delay authorized in standard oil and gas lease terms. Federal oil and gas estate (17 acres under federal surface and 137 acres of split estate) within elk calving areas would be open to leasing with a timing limitation being in effect from April 16 through June 30 to prevent disturbance to calving elk. Variances to these stipulations may be granted (see Appendix K).

Disposal of mineral materials would not be authorized on 26,112 acres of federal mineral estate from December 1 through April 30 on crucial big game winter range to prevent disturbance to wintering deer and elk. Disposal would not be permitted on 17 acres of federal mineral estate from April 16 through June 30 within elk-calving areas to prevent disturbance to calving elk. Disposal would not be authorized on 126 acres of federal mineral estate within 1/4 mile of sage grouse lek sites from April 1 through May 31 to prevent disturbance to strutting sage grouse.

Soils and Water. Non-conflicting soil and watershed improvement projects, such as check dams, would be permitted.

Livestock Grazing Management. In order to permit riparian conditions to improve, livestock grazing would not be authorized on public lands along North Willow Creek in the Stevens Creek Common Allotment, No. 6202, until the riparian area has recovered suffuciently to permit livestock use. Grazing systems approved for this section of North Willow Creek would include measures to facilitate the continued improvement of riparian conditions and resources.

Livestock grazing would not be authorized within Allotment 6200 in this unit in order to remedy conflicts involving wildlife habitat. Non-conflicting and compatible livestock management objectives, projects, and mitigating measures would be incorporated into new activity plans, such as AMPs, HMPs or CRMAs, before being implemented.

Forest Management. Commercial logging operations would be designed to enhance crucial big game winter range, and vegetation in general.

Recreation Management. Approximately 600 acres of public land within or adjacent to the Sapinero State Wildlife Area would be closed to motorized vehicular use in order to be compatible with CDOW management on adjacent state-owned lands. Motorized vehicular use on the remaining 27,615 acres of public lands in the unit would be limited to designated routes, if necessary, from December 1 through April 30, to prevent disturbance to wintering elk and deer in the event of excessive snow depths or big game herd concentrations.

Visual Resource Management. The unit would be managed according to VRM Class II (7,551 acres), VRM Class III (9,887 acres), and VRM Class IV (10,777 acres) objectives.

Rights-of-Way. Rights-of-way related construction activities would not be permitted on crucial big game winter range from December 1 through April 30 to prevent disturbance to wintering elk and deer.

Fire Management. Wildfires on about 20,365 acres of public lands would be managed according to a conditional suppression policy and about 7,850 acres would be managed according to a full suppression policy.

Withdrawals and Classifications. The 40-acre Bureau of Reclamation withdrawal and the 40-acre FERC withdrawal (BLM Order 12-15-58) would be continued in the unit until the boundary for the Curecanti NRA is finalized. These withdrawals would be reviewed periodically.

MANAGEMENT UNIT 8 (South Beaver Creek ACEC)

Land ownership: 4,570 acres of Public Surface; Less than 1% of the Planning Area

This unit is located between the Gold Basin Creek Road (Gunnison County Road 38) and South Beaver

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Creek immediately southwest of Gunnison. The unit is characterized by sagebrush-covered rolling hills with many intermittent drainages and benches. A 230 kv electrical transmission line crosses the southern end of the unit. Several roads are located within the unit. About 1,960 acres of crucial big game winter range occur in the unit. The public lands in the north and east portions of the unit receive heavy OHV use. The unit contains scattered populations of skiff milkvetch (*Astragalus microcymbus*), a USF&WS Category 2 and Colorado sensitive plant species. The species is not fully protected under the Threatened and Endangered Species Act.

The unit would be designated and managed as the South Beaver Creek Area of Critical Environmental Concern (ACEC). The unit would be managed to protect and enhance existing populations and habitat of skiff milkvetch. Plant monitoring studies would be designed and conducted cooperatively with the Colorado Natural Areas Program and The Nature Conservatory to determine population trends; actions designed to improve habitat conditions would be initiated. Surface disturbing activities would be restricted to protect the species and potential habitat. An ACEC management plan would be prepared. No chemical spraying would occur on public lands within the unit. Any research activities would require approval by the BLM.

To protect skiff milkvetch populations and habitat, no large land or vegetative treatments, or treatment maintenance would be conducted in the unit.

No additional forage allocations would be made for either wildlife habitat or livestock grazing management.

The entire Federal oil, gas, and geothermal estate in the unit, 4,540 acres, would be open to leasing with a controlled surface use stipulation in order to protect populations of skiff milkvetch. Please refer to Appendix K for the controlled surface use stipulation requirements for this unit. Disposal of mineral materials on 4,540 acres of federal mineral estate within the unit would not be authorized for the same reason.

Soils. Non-conflicting erosion control measures that do not alter existing skiff milkvetch habitat would be permitted.

Livestock Grazing Management. Domestic sheep grazing would not be authorized in the unit to avoid possible destruction of skiff milkvetch populations and related habitat.

Recreation Management. To prevent accidental destruction of skiff milkvetch populations, and existing habitat, motorized vehicular traffic in the unit would be limited to designated routes.

Visual Resources. The unit would be managed according to VRM Class III (2,800 acres) and VRM Class IV (1,765 acres) objectives.

Disposal of Public Lands. Public lands in the unit containing colonies of skiff milkvetch would not be available for disposal until future inventories show that sufficient colonies occur throughout the Planning Area such that disposal would not jeopardize the overall population.

Acquisition of Non-Federal Lands. If available, non-federal lands containing colonies of skiff milkvetch would be acquired if necessary for the enhancement, management, protection of the species, and to increase the number of colonies on public lands.

Rights-of-Way. Rights-of-way developments would be permitted throughout the unit, provided surface disturbance does not impair or degrade colonies of skiff milkvetch. An on-the-ground inventory and appropriate mitigation would be required on all rights-of-way involving surface disturbing activities.

Fire Management. Wildfires in the unit would be managed under the conditional suppression category.

MANAGEMENT UNIT 9 (Dillon Pinnacles ACEC)

Land Ownership: 535 acres of Public Surface; less than 1% of the Planning Area.

DESCRIPTION OF THE PRMP

This unit is located near the edge of the planning area boundary on the north side of U.S. Highway 50 and the Blue Mesa Reservoir, and is adjacent to unit 5, West Antelope ACEC. The specific management for this unit would be included in the ACEC management plan for unit 7. The public lands are classified as crucial big game winter range. The unit contains portions of the steep, highly dissected cliffs (spires) that form a highly visible and scenic backdrop for Blue Mesa Reservoir. The National Park Service maintains a heavily used hiking trail to these spires. A concern within the unit is that private development could occur on approximately 270 acres of non-federal land.

The unit would be designated and managed as the Dillon Pinnacles Area of Critical Environmental Concern (ACEC). Appropriate management actions and recommendations from this prescription would be incorporated into the management plan for the West Antelope Creek ACEC. The unit would be managed to protect scenic and recreational opportunities. Surface disturbing activities would not be permitted.

All the federal mineral estate in the unit, 552 acres, would be withdrawn from mineral entry and location under the general mining laws in order to preclude potential mineral development and deterioration of scenic values.

The entire federal oil and gas estate in the unit, totalling 530 acres under federal surface and 22 acres of split estate, would be open to future mineral leasing with a no surface occupancy stipulation in order to prevent potential deterioration of scenic, recreation, and other natural values. Disposal of mineral materials on 530 acres of the federal mineral estate in the unit would not be permitted for the same reason.

Livestock Grazing Management. Livestock grazing would not be authorized within the unit in order to maintain a natural appearing landscape.

Recreation Management. The unit would be closed to motorized vehicular travel to prevent deterioration of scenic values.

Visual Resource Management. The unit would be managed according to VRM Class I objectives.

Acquisition of Non-Federal Lands. If available, approximately 270 acres of non-federal lands would be acquired in order to enhance and facilitate management of visual, recreation, and other natural values, and to prevent deterioration of visual resources from potential private development.

Rights-of-Way. Public lands in the unit would be classified an exclusion area for rights-of-way.

Fire Management. Wildfires in the unit would be managed under the full suppression category.

Withdrawals and Classifications. All the federal mineral estate in the unit, 552 acres, would be withdrawn from mineral entry and location under the general mining laws in order to preclude potential mineral development and deterioration of scenic values.

MANAGEMENT UNIT 10

Land Ownership: 15,112 acres of Public Surface;
3% of the Planning Area

This unit consists of lands containing yearlong bighorn sheep and other wildlife habitat.

This unit consists of areas along Cebolla and Cochetopa Creek that are important for the viability of bighorn sheep in the Planning Area. The CDOW has frequently trapped bighorn sheep in this unit for reintroduction and transplants into other areas. The unit is grazed by cattle, and domestic sheep grazing occurred in the past. Diseases potentially being transferred from domestic sheep to bighorn sheep, and road construction and encroachment along the east side of the Cebolla Creek area are concerns within the unit.

The unit would be managed to maintain or improve habitat capable of supporting a self-sustaining population of bighorn sheep, with herd sizes of about 100-150 animals in the Cochetopa Canyon and about 150 animals in the Cebolla Creek area. An HMP would be prepared. Activities that would result in disturbance to lambing bighorn sheep would be restricted from April 15 through June 15. Monitoring would be conducted to determine habitat

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condition and trend, and forage utilization, including within existing treatment areas. Activities and land uses that would result in the deterioration of, or decrease in, bighorn sheep habitat or herd numbers would not be permitted. Wildlife treatments recommended in the HMP as a result of monitoring would be permitted.

Federal mineral estate totalling 269 acres within BLM protective withdrawal C-014711 along parts of Cebolla Creek would continue to be withdrawn from mineral entry and location in order to protect riparian and recreation values from potential mining disturbances.

The entire federal oil and gas estate in the unit, totalling 14,817 acres under federal surface and 590 acres of split estate, would be open to leasing with a no-surface-occupancy stipulation to prevent disturbance to bighorn sheep and their habitat. Disposal of mineral material on 14,817 acres of federal mineral estate would not be permitted from April 15 through June 15 to prevent disturbance to bighorn sheep habitat and lambing bighorn sheep. Disposal of mineral materials would not be permitted on 1,245 acres of federal mineral estate from April 15 through June 30 within elk-calving areas to prevent disturbance to, and on 225 acres yearlong within withdrawal C-014711 to protect recreation and riparian values along parts of Cebolla Creek from potential disturbances associated with mineral material disposal.

Livestock Grazing Management. Domestic sheep grazing would not be authorized in the unit to help prevent disease spreading from domestic sheep to bighorn sheep. Livestock grazing would be managed in a manner compatible with the objectives of this unit. Range improvements or treatments recommended in activity plans, such as AMPs or CRMAs, as a result of monitoring would be permitted if compatible with maintaining bighorn sheep habitat.

Visual Resource Management. The unit would be managed according to VRM Class II (7,367 acres), VRM Class III (540 acres) and VRM Class IV (7,205 acres) objectives.

Transportation and Access. Public access would be acquired along Rock Creek for recreation management.

Rights-of-Way. Public lands would be open to the location of rights-of-way with appropriate mitigation to insure compatibility with the management of bighorn sheep. Rights-of-way construction or maintenance that would result in disturbance to lambing bighorn sheep would not be permitted from April 15 through June 15.

Fire Management. Wildfires on about 8,687 acres of public lands would be managed according to a conditional suppression policy and about 6,425 acres would be managed according to a full suppression policy.

Withdrawals and Classifications. Federal mineral estate totalling 269 acres within BLM protective withdrawal C-014711 along parts of Cebolla Creek would continue to be withdrawn from mineral entry and location in order to protect riparian and recreation values from potential mining disturbances.

Water Power and Storage Reservoir Sites. The unit would be recommended to be closed to the development of waterpower and storage reservoir sites.

MANAGEMENT UNIT 11

Land ownership: 57,525 acres of Public Surface; 10% of the Planning Area

This unit consists of sage grouse high production areas.

This management unit is located generally on sagebrush-covered rolling terrain in the eastern part of the planning area. The unit contains sage grouse high production areas, and supports part of the third largest sage grouse population in Colorado. Most of the public lands in the unit are available for livestock grazing. The unit surrounds or contains riparian areas. The sagebrush vegetative communities within this unit provide important sage grouse nesting habitat, year-round food sources, cover for young

DESCRIPTION OF THE PRMP

birds (brood areas), and mating/strutting habitat (leks). The unit also contains 29,130 acres of crucial elk and deer winter range and 28,147 acres of yearlong pronghorn antelope range. Concerns within the unit regarding sage grouse habitat include disturbances to nesting or strutting sage grouse, poor quality and below-potential sagebrush nesting habitat; large-scale sagebrush removal treatments within or near nesting habitat and leks; utilization within treated areas that has resulted in sagebrush re-invasion and a subsequent lack of grasses and forbs within nesting and lek areas; and removal of sage grouse winter habitat (tall, dense sagebrush in drainages as a result of vegetation treatments).

This management unit would be managed to improve and maintain sagebrush vegetative communities in order to optimize sage grouse populations. Sagebrush treatments and management to improve sage grouse habitat would be incorporated into all activity plans, such as AMPs or CRMAs, and their design, implementation, and management would incorporate as a minimum the sage grouse habitat management guidelines in Appendix A. Deviations from these guidelines may be granted by the authorized officer if it can be demonstrated that short term impacts would be offset by long term benefits to sage grouse and their habitat.

Proposed habitat improvements would be implemented and managed to maintain and improve these areas crucial to sage grouse populations. All leks would be protected from destruction. No surface disturbance would be permitted within 1/4 mile of all lek locations from April 1 through May 31 (strutting season) to prevent disturbance to sage grouse while mating. Activities occurring on crucial elk and deer winter range in the unit would be restricted to prevent disturbing wintering elk and deer from December 1 through April 30. Compatible sagebrush treatments and projects would be permitted.

Approximately 1,134 acres of federal oil and gas estate within a one-fourth mile radius of nine sage grouse leks in the unit would be open to leasing with a no surface occupancy stipulation to prevent disturbance to strutting sage grouse.

Disposal of mineral materials would not be permitted on 1,134 acres of federal mineral estate within

one-quarter mile of all leks in the unit from April 1 through May 31, and within 28,267 acres of federal mineral estate on crucial big game winter range from December 1 through April 30, in order to prevent disturbance to strutting sage grouse and wintering deer and elk, respectively.

Livestock Grazing Management. Range treatments, improvements, and projects meeting sage grouse habitat management objectives for this unit would be permitted. New or additional forage made available as a result of livestock grazing treatments/projects would be allocated according to STANDARD MANAGEMENT for Livestock Grazing Management.

Visual Resource Management. The unit would be managed according to VRM Class II (1,080 acres), VRM Class III (18,995 acres), and VRM Class IV (37,462 acres) objectives.

Fire Management. Wildfires on about 57,170 acres of public lands would be managed according to a conditional suppression policy and about 367 acres would be managed according to a full suppression policy.

Withdrawals and Classifications. The 330 acre Department of Energy (DOE) withdrawal for a potential mine tailings site would be recommended to be continued. When DOE actions are finalized, some lands may be transferred to that agency. Any lands transferred would no longer be withdrawn or subject to BLM management. The need for the withdrawal would be reviewed periodically.

MANAGEMENT UNIT 12

Land ownership: 91,547 acres of public surface; 16% of the Planning Area.

This unit contains elk and deer crucial winter range.

This management unit is located generally at lower elevations and throughout the planning area. Public lands totalling approximately 76,192 acres are crucial elk and deer winter range. Livestock grazing and other land uses occur on most of the public lands in the unit. The unit contains lands critical to early

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spring and summer livestock grazing. A variety of vegetation types occur within the unit, including some riparian zones. The unit also contains lands within the Gunnison ERMA; elk calving areas totalling 235 acres; and sage grouse brood-rearing areas.

Concerns within the unit include winter range occurring on mixed land ownership; large numbers of deer congregating along U.S. Highway 50; heavy to severe utilization of mountain mahogany by elk and deer and the lowering plant vigor in GMU 64 northeast of Cimarron; vegetative treatments that have resulted in the removal of browse species; and long-range CDOW herd goals possibly being too high in parts of the unit to maintain healthy browse stands under the current condition of the browse species in these GMUs (see Table A-1, Appendix A, for CDOW long-range herd goals for entire GMUs).

The unit would be managed to improve habitat conditions and increase the production and diversity of shrub species in upland and riparian vegetative types to support wintering populations of deer and elk, and to help meet CDOW long-range herd goals.

Any additional forage available for livestock as a result of range improvements, treatments, or grazing management procedures would be allocated in accordance with 43 CFR 4100, with consideration given to meeting the basic soil and watershed needs defined in the Montrose District Soil Erosion Monitoring Guidelines. See Table N-1, Appendix N, for target basal cover densities that would be achieved on treated areas before forage would be available for livestock grazing needs. Table N-1 is derived from Appendix F of the guidelines referenced above. Any additional forage available for livestock would be considered in reactivating suspended use or as a means to avoid suspending active use.

An HMP or a CRMAP would be developed focusing on overall habitat improvement and intensive habitat management. The plan would include treatments and projects in uplands and riparian ecosystems to increase the production and composition of bitterbrush, serviceberry, mountain mahogany, willows, and cottonwoods. Methods would include shrub plantings, burning, and techniques to convert decadent sagebrush stands to stands dominated by young sagebrush plants in the uplands. Wildlife

habitat treatments would be maintained to ensure success. Monitoring of habitat conditions, utilization, and trend would be continued.

In the portions of GMU 55, 66, 67, and 551 within the unit, resources and land uses would be managed for the benefit of elk and deer winter habitat. In the portions of GMU 64 south and east of Cimarron in the unit big game utilization would be limited to 50% of the current years' growth of mountain mahogany. To help achieve this lower rate, a recommendation would be made to the CDOW to implement measures to temporarily reduce big game numbers in the GMU. See Table A-4 in Appendix A for more information.

Interim deer herd goal numbers in portions of certain other GMUs within the unit (55, 66, 67, and 551) would be recommended to CDOW in order to permit the production and vigor of important browse species to increase such that winter habitat necessary to support CDOW's long-range herd numbers would be available. See Table A-4, Appendix A, for interim elk and deer numbers to be recommended on BLM-managed lands, and Tables A-2 and A-3 for long-range elk and deer herd goals for BLM-managed lands within the unit.

Activities that would result in disturbances to big game would be excluded from December 1 through April 30. Activities that would disturb elk within calving areas from April 16 through June 30 would be excluded.

To prevent disturbance to calving elk, a timing limitation would be in effect on approximately 235 acres of federal oil, gas, and geothermal estate under federal surface, from April 16 through June 30, within elk-calving areas in the unit. Federal oil and gas estate totalling 882 acres under federal surface within 1/4 mile radius of sage grouse lek sites would be open to leasing with a no surface occupancy stipulation to prevent disturbance to strutting sage grouse. Variances to these stipulations may be granted (see Appendix K).

Disposal of mineral material within elk-calving areas would not be authorized on 235 acres of federal mineral estate from April 16 through June 30 to prevent disturbance to calving elk, on 74,185 acres of

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federal mineral estate from December 1 through April 30 within crucial big game winter range to prevent disturbance to wintering elk and deer, and on 882 acres of federal mineral estate within a 1/4 mile radius of sage grouse lek sites from April 1 through May 31 to prevent disturbance to strutting sage grouse and habitat.

The federal oil and gas estate in withdrawal C-041711 along Cebolla Creek, totalling 164 acres, would be open to mineral leasing with a controlled surface use stipulation being in effect that restricts oil and gas development, as well as related surface disturbance, to an area beyond all riparian vegetation, in order to prevent damage to or removal of riparian vegetation (See Appendix K for this stipulation and exception language). Mineral material disposal would not be permitted on these lands for the same reasons.

Livestock Grazing Management. Domestic sheep grazing and trailing would be excluded within the portion of GMU 64 in the unit from October 15 through April 15 in order to eliminate forage competition with big game. Compatible range improvements, treatments, or projects would be permitted.

Forest Management. Suitable commercial forest lands and woodlands would be available for harvest, with a seasonal stipulation on harvesting from December 1 through April 30 to reduce stress on wintering big game. Inventories of all forest lands and woodlands would be conducted to determine associated big game habitat conditions and habitat improvements needs. Spur roads and temporary roads used for logging would be kept to a minimum and would be physically blocked and re-vegetated after completion of operations.

Recreation Management. Motorized vehicular traffic on public lands in the unit north of U.S. Highway 50, east of the Gunnison River and west of Quartz Creek would be limited to designated routes from December 1 through April 30, if necessary, due to big game herd concentrations or excessive snow depth, to prevent disturbance to wintering deer and elk. The remainder of the unit would be open to motorized vehicular traffic.

Visual Resource Management. Public lands in the unit would be managed according to VRM Class II (7,747 acres) and VRM Class III (47,680 acres), and VRM Class IV (36,120 acres) objectives.

Transportation and Access. Public access would be acquired into the Bead Creek area for recreation and livestock grazing management.

Fire Management. Wildfires on about 83,012 acres of public lands would be managed according to a conditional suppression policy and about 8,535 acres would be managed according to a full suppression policy.

Withdrawals and Classifications. Approximately 840 acres of public lands within Bureau of Reclamation withdrawal C-28255 in GMU 64 near Cimarron would be recommended for relinquishment. Approximately 17 acres located in BLM Power Site Reserve No. 50, C-28588, would be revoked. These lands are not needed for the withdrawn purposes, and would be managed according to Standard Management and the prescription for this unit.

MANAGEMENT UNIT 13

Land Ownership: 187,030 acres of Public Surface; 32% of the Planning Area

This unit generally contains "I" category livestock grazing allotments.

This management unit is located throughout the planning area except in the extreme eastern, northeastern, and northwestern portions. The unit consists of intensively managed BLM "I" category grazing allotments. The unit also contains pronghorn antelope habitat, elk calving areas, sage grouse nesting areas, and stands of suitable commercial forest lands. The unit also contains approximately 20,970 acres of crucial big game winter range on public lands. Public lands in the unit are located within the Gunnison Extensive Recreation Management Area and provide a variety of recreation resources and opportunities, including a hang-gliding site on Big Mesa and an area of concentrated public recreation use on High Mesa. Concerns within the

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unit are a lack of up-to-date vegetation trend data, a heavy-to-severe utilization of some riparian vegetation, resulting in below-potential forage production, undesirable plant compositions, stream channel and stream bank erosion and instability and other hydrological problems within riparian ecosystems, total forage production being far below potential, utilization of forage on public lands within a portion of the unit before range readiness criteria are met, sagebrush treatment location, design, and their later management, recreation users causing livestock control and management problems by leaving gates open, an unchecked increase in noxious weeds and their potential to reduce forage production and danger to livestock, and the shortage of AMPs.

The unit would be managed to improve ecological conditions. Suitable commercial forest lands would be available for harvest. Suitable public lands would be available for livestock grazing. Activity plans, such as CRMAs or AMPs, would be developed, and existing AMPs would be updated as needed using CRMAs standards and procedures. Existing range improvements and treatments would be maintained and new range improvements and treatments would be developed according to updated or new activity plans. New or additional available forage would be allocated according to STANDARD MANAGEMENT. In order to permit riparian conditions and the fishery resource to improve, livestock grazing would not be authorized on public lands along approximately 1/4 mile of Los Pinos Creek in Allotment 6340 until the riparian area has recovered sufficiently to permit livestock use. Rangeland vegetation monitoring and inventory for condition, trend, and utilization patterns would continue. Activity plans developed that involve lands at High Mesa, Hartman Rocks, and Big Mesa would include and consider management objectives for all resources, including recreation management.

Federal mineral estate totalling 262 acres would continue to be withdrawn from mineral entry and location under the mining laws at the Big Mesa FAA radar communication site. Mineral material disposal would not be authorized on these lands.

Wildlife Habitat Management. Federal oil and gas estate totalling 1,680 acres under federal surface and

42 acres of split estate on elk calving areas would be open to leasing with a timing limitation being in effect from April 16 through June 30 to prevent disturbance to calving elk. Federal oil and gas estate totalling 882 acres under federal surface within 1/4 mile radius of sage grouse lek sites would be open to leasing with a no surface occupancy stipulation to prevent disturbance to strutting sage grouse. Variances to these stipulations may be granted (see Appendix K). Disposal of mineral materials would not be permitted on federal mineral estate on these lands during these same time periods for the same reasons.

Recreation Management. One area on High Mesa would be considered for a campground. A hiking trail would be constructed into the Rock Creek area (T. 45 N., R. 1 W., Section 16, N.M.P.M.).

Motorized vehicular traffic in the unit on public lands in the area north of U.S. Highway 50, east of West Antelope Creek, and west of the Gunnison River would be limited to designated routes from December 1 through April 30, if necessary, due to big game herd concentrations or excessive snow depths in order to prevent disturbance to wintering big game. The remainder of public lands in the unit would be open to motorized vehicular use.

Visual Resource Management. The unit would be managed according to VRM Class II (26,312 acres), VRM Class III (47,680 acres) and VRM Class IV (11,718 acres) objectives. If feasible, rehabilitation measures would be conducted on 1,687 acres of public lands classified as VRM II R and IV R (lands with existing man-made visual intrusions) in order to improve scenic quality.

Transportation and Access. Administrative access would be acquired into the Huntsman Mesa area from Colorado Highway 149 for livestock grazing management and public access would be acquired into the Vulcan/Big Mud Pond area and into public lands east of Deer Beaver Creek for recreation and livestock grazing management; into Willow Creek in the Blue Mesa area for commercial forest, livestock grazing, and recreation management, and into the Sandy Mesa area and Poison Draw areas on Blue

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Mesa for commercial forest and livestock grazing management.

Fire Management. Wildfires on about 160,110 acres of public lands would be managed according to a conditional suppression policy and about 27,467 acres would be managed according to a full suppression policy.

MANAGEMENT UNIT 14

Land Ownership: 2,667 acres of Public Surface; less than 1% of the Planning Area

This unit consists of riparian areas containing important sage grouse broodrearing areas along about 25 miles of public land.

This management unit consists of public lands containing riparian areas within important sage grouse high production habitat. These lands are located east of Gunnison and are associated with perennial or intermittent streams. Some of the public lands within this unit are big game crucial winter range. The abundance of insects and lush herbaceous vegetation found in riparian areas is crucial for the survival of sage grouse chicks during the first twelve weeks after hatching. Resources within this unit are also important for the maintenance and enhancement of the quality of general riparian vegetation, aquatic/fishery habitat, stream channels, and water quality. Concerns within this unit are that riparian ecosystems in general are below their ecological potential and have been reduced in size due to water regimes being modified by improper livestock grazing and road locations. Downcutting or channel incision, and accompanying lowering of water tables has resulted in a reduction in riparian plant species and an invasion of upland plants.

The unit would be managed to protect, restore and enhance these riparian areas on public lands in order to optimize sage grouse populations. Management objectives would be to provide high quality brood-rearing habitat with a diversity of plant species composition and structure, aimed at achieving improved riparian conditions. Adequate vegetative cover necessary to avoid predation of foraging chicks would be another desired condition to be achieved.

Riparian improvement strategies and/or projects would be included in all CRMAs and other activity plans and implemented.

Emphasis would be placed on rehabilitating riparian areas where the riparian or hydrological condition is degraded. The herbaceous plant species would be increased to improve forage plants and insects for sage grouse. The proportion of native bunch grasses would be increased to help meet escape and hiding cover requirements of sage grouse chicks. Measures to reduce impacts to the riparian ecosystems and associated stream channels, and to prevent unnecessary removal of sage grouse brood habitat would be included in all surface-disturbing plans. No surface disturbing activities would be permitted from June 15 through July 31 in order to prevent disturbance to sage grouse during the brood-rearing period. All leks would be protected from surface disturbance. Resources within this unit would continue to be inventoried and evaluated for potential, condition and trend, and monitoring studies would be conducted. Vegetation treatments compatible with the objectives of this unit would be permitted.

The federal oil and gas estate in the unit, totalling 2,440 acres under federal surface and 60 acres of split estate would be open to mineral leasing with a controlled surface use stipulation being in effect that restricts oil and gas development, as well as related surface disturbance, to an area beyond all riparian vegetation, in order to prevent damage to or removal of riparian vegetation and sage grouse brood-rearing habitat (see Appendix K for this stipulation and exception language). Federal oil and gas estate within 1/4 mile of sage grouse leks totalling 126 acres under federal surface would be open to leasing with a no surface occupancy stipulation to prevent disturbance to strutting sage grouse. Variances to these seasonal stipulations may be granted (see Appendix K).

Disposal of mineral materials on about 2,440 acres of federal mineral estate in the unit would not be authorized, from June 15 through July 31 to prevent disturbance to sage grouse during the brooding period, at sage grouse leks on 126 acres of federal mineral estate from April 1 through May 31 to prevent disturbance to strutting sage grouse, and from December 1 through April 30 on 1085 acres of

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federal mineral estate within crucial big game winter range to prevent disturbing wintering deer and elk.

Livestock Grazing Management. A 4 inch minimum stubble height would be maintained from June 15 through July 31 in order to improve and provide cover for sage grouse chicks, to improve general riparian ecosystem conditions, and to help increase the proportion of native bunch grasses, resulting in more livestock forage. A 2½ inch stubble height would be required at all other times.

Where authorized, domestic sheep grazing would be permitted in the unit only after June 1 to prevent disturbance to nesting sage grouse and nests.

Visual Resource Management. The unit would be managed according to VRM Class II (21 acres), VRM Class III (482 acres), and VRM Class IV (2,102 acres) objectives.

Rights-of-Way. Mitigating measures would be included in rights-of-way authorizations to prevent disturbance within this unit to brooding sage grouse from June 15 through July 31 and from December 1 through April 30 on crucial big game winter range to prevent disturbance to wintering deer and elk.

Fire Management. Wildfires on about 72 acres of public lands would be managed according to a conditional suppression policy and about 2,533 acres would be managed according to a full suppression policy.

Water Power and Storage Reservoir Sites. The unit would be recommended to be closed to the development of water power and storage reservoir sites.

MANAGEMENT UNIT 15

Land Ownership: 4,725 acres of Public Surface; less than 1% of the Planning Area

This unit consists of riparian areas containing important fishery streams along approximately 57 miles of public land.

This unit consists of public land along 57 miles of streams and riparian zones containing a fishery or having the potential to support and maintain catchable populations of fish. Parts of the unit are located throughout the Planning Area, and are associated with a variety of riparian zones. Parts of some of the streams contain crucial big game winter range, elk calving areas, lands suitable for grazing, lands within two SRMAs, and sage grouse brood-rearing habitat. This unit contains a 1.9 mile-long portion of Segment A of the Lake Fork of the Gunnison River, a study segment eligible for inclusion into the National Wild and Scenic Rivers System. Concerns are water quality, streams being below their potential for providing aquatic habitat, livestock forage utilization, physical damage from livestock grazing and roads, and a lack of fishery resource information to use in planning for habitat improvement projects.

The unit would be managed to restore and enhance the condition of fishery streams. Projects would be developed to stabilize and restore stream banks and improve instream conditions. Riparian vegetation and soil improvement projects would be permitted and included in all CRMAs, AMPs, or other activity plans, and implemented to meet the objectives of this unit. The Resource Area HMP would be revised to include recommendations in this unit. Resources would continue to be inventoried and monitored for condition, potential, and trend.

Federal mineral estate totalling approximately 125 acres in BLM protective C-014711 along Cebolla Creek would continue to be withdrawn from mineral entry and location in order to protect riparian values from potential mining disturbances. Approximately 445 acres of federal mineral estate in BLM protective withdrawal C-0124523 along the backcountry byway would continue to be withdrawn from mineral entry and location in order to protect scenery along the byway from potential mining disturbances.

Federal oil, gas, and geothermal estate totalling 445 acres under federal surface, would be open to leasing with a no surface occupancy stipulation within BLM protective withdrawal C-0125423 to protect riparian values and scenery within the Alpine Loop

DESCRIPTION OF THE PRMP

backcountry byway. Mineral material disposal on these lands would not be permitted yearlong for the same reasons.

Federal oil, gas, and geothermal estate within elk calving areas, 247 acres under federal surface, would be open to leasing with a timing limitation being in effect from April 16 through June 30 to prevent disturbance to calving elk. Variances to these stipulations may be granted. Disposal of mineral materials on the federal mineral estate in these areas would not be permitted during those same times for the same reasons.

Disposal of mineral materials on 655 acres of federal mineral estate within crucial elk and deer winter range would not be authorized from December 1 through April 30 to prevent disturbance to wintering big game.

Livestock Grazing Management. When grazing occurs in the unit, a minimum stubble height of 4 inches would be maintained for key herbaceous forage species within riparian zones, in order to improve stream and streamside conditions, including soils and vegetation in the associated riparian zones. The minimum stubble height would be implemented according to the Livestock Grazing Management section of Standard Management.

Livestock grazing would continue to not be authorized along Henson Creek in order to maintain riparian, fishery, and scenic values.

Recreation Management. Motorized vehicular traffic in the unit would be managed as follows: OHV traffic south of Lake City (1,680 acres) would be limited to designated routes yearlong, with snowmobile use permitted on snow, and when the CRM MAP is prepared for the Alpine Triangle SRMA, a map would be included and areas defined on the ground delineating appropriate pull-off and parking areas adjacent to designated routes; traffic in the unit on Alder Creek (235 acres) would be limited to designated routes, if necessary, from December 1 through April 30, in order to prevent disturbance to wintering elk and deer on crucial big game winter range. The remainder of the lands in the unit would be open to OHV traffic (3,040 acres).

Appropriate management actions and recommendations from this prescription would be incorporated into the CRM MAP for the Alpine Triangle SRMA.

The portions of this unit in the Alpine Triangle SRMA would continue to be managed for the ROS settings in the RAMP for that SRMA.

Wild and Scenic River Study Segment. The 1.9 mile-long portion of Segment A of the Lake Fork of the Gunnison River, a segment found to be eligible, but not suitable, for inclusion into the National Wild and Scenic Rivers System, would be managed according to this prescription and STANDARD MANAGEMENT for the PRMP. See Appendix I for the eligibility and suitability determinations and maps for the segment.

Visual Resource Management. The unit would be managed according to VRM Class II objectives.

Rights-of-Way. No surface-disturbing activities would be permitted along Alder, Willow (west of Gunnison), and Razor Creeks, and along the lower one-mile of South Beaver Creek in the unit from July 1 through July 31 in order to prevent disturbance to sage grouse during the brood rearing period. Mitigating measures would be included in rights-of-way authorizations in these areas of this unit to prevent disturbance to brooding sage grouse.

Fire Management. Wildfires on about 3,470 acres of public lands would be managed according to a conditional suppression policy and about 1,485 acres would be managed according to a full suppression policy.

Withdrawals and Classifications. The BLM protective withdrawals C-0125423 along the backcountry byway in the unit, about 445 acres, and C-014711 (125 acres) along parts of Cebolla Creek, would be continued, in order to protect riparian, fishery, and scenic values.

Water Power and Storage Reservoir Sites. The unit would be recommended to be closed to the development of water power and storage reservoir sites.

CHAPTER FOUR

MANAGEMENT UNIT 16

Land Ownership: 36,768 acres of Public Surface; 6% of the Planning Area

This unit consists generally of general resource lands.

This management unit is located throughout the planning area. Livestock grazing occurs in this unit containing public lands within "M" (20,300 acres) or "C" (4,777 acres), or "I" (915 acres) category grazing allotments. The unit is located within the Gunnison Extensive Recreation Management Area (ERMA). Concentrated public recreation use, such as camping and picnicking, occurs on a tract of public land approximately 400 acres in size along the Slate River.

The public lands would be managed according to this Management Unit prescription and Standard Management. No major BLM funded projects or facilities would be developed. Studies and inventories involving habitat, vegetation, and other resources would be minimal.

Measures would be included in all plans for surface disturbing activities to prevent disturbance to wintering big game, soil erosion, and deterioration of visual resources and water quality.

The federal mineral estate at the 60-acre Soap Creek and the 40-acre Old Agency FS administrative sites would continue to be withdrawn from mineral entry and location in order to prevent potential mining disturbances on these lands.

Federal oil and gas estate totalling 252 acres under federal surface within 1/4 mile radius of sage grouse lek sites would be open to leasing with a no surface occupancy stipulation to prevent disturbance to strutting sage grouse. The federal oil and gas estate at the 40-acre Old Agency and the 60-acre Soap Creek FS administrative sites would be open to leasing with no surface occupancy in order to protect these uses and facilities from disturbance. Federal oil and gas estate, 4,580 acres under federal surface and 4,885 acres of split estate within elk calving areas, would be open to leasing with a timing limitation

being in effect from April 16 through June 30 to prevent disturbance to calving elk. Variances to these stipulations may be granted (see Appendix K). For these same reasons, disposal of mineral materials would not be permitted on 4,580 acres of federal mineral estate from April 16 through June 30 within elk-calving areas, on 252 acres of federal mineral estate within 1/4 mile of sage grouse lek sites from April 1 through May 31, and on the two FS administrative sites yearlong.

Livestock Grazing Management. Livestock grazing would continue not to be authorized on 320 acres in Wildcat Creek drainage to help maintain Crested Buttes' water supply. Range treatments or projects would be permitted otherwise in the unit, according to Standard Management for Livestock Grazing, and would be compatible with the objectives of this unit.

Recreation Management. A hiking trail would be constructed into the Rock Creek area (T.45 N., R 1 W., Section 16, N.M.P.M.). The Slate River area would be considered for the development of a campground. Motorized vehicular traffic on public lands unit north of U.S. Highway 50, south of sections 17 and 18, T. 51 N, R. 1 W., N.M.P.M., east of West Antelope Creek, and west of the Gunnison River only (3,073 acres) would be limited to designated routes from December 1 through April 30 if necessary, due to excessive snow depths or herd concentrations in order to prevent disturbance to wintering elk and deer. The remainder of public lands in the unit open to OHV traffic (34,543 acres).

Visual Resource Management. The unit would be managed according to VRM Class II (11,159 acres), VRM Class III (6,892 acres) and VRM Class IV (14,882 acres) objectives. Rehabilitation measures would be conducted on 2,367 acres of public land classified as VRM IIR, IIIR, and IVR (lands with existing man-made visual intrusions) in order to improve scenic quality.

Fire Management. Wildfires on about 26,356 acres of public lands would be managed according to a conditional suppression policy and about 11,260 acres would be managed according to a full suppression policy.

DESCRIPTION OF THE PRMP

Withdrawals and Classifications. The USFS withdrawals at Old Agency and Soap Creek, about 100 acres total, would be continued. A 160

acre Bureau of Reclamation withdrawal between Haypress and Corral Creeks would be continued until the boundary for the Curecanti NRA is finalized.

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Chapter Five describes the physical, biological, and economic consequences of implementing the Proposed Resource Management Plan (PRMP) described in Chapter Four of this document. This chapter discusses only those resources which would be impacted as a result of implementing the PRMP.

Both adverse and beneficial impacts were analyzed, based on the effects that management actions in the PRMP would have upon the resources/resource uses within the affected environment in Chapter Two of the Gunnison Draft Resource Management Plan and Environmental Impact Statement (DRMP). Mitigating measures designed to avoid or reduce environmental impacts were incorporated into the PRMP. Impacts identified in this chapter are thus considered unavoidable, and would result from implementing the management actions and mitigation.

ASSUMPTIONS FOR ANALYSIS

An interdisciplinary approach was used in developing and analyzing environmental consequences. The general assumptions used during the analysis included:

1. Significant adverse and beneficial changes or impacts would be analyzed. Some less-than-significant impacts are presented to better illustrate the scope and effect of a management action in some cases, or to differentiate between significant and non-significant impacts. Significant impacts are identified.

2. Changes or impacts described are short-term unless otherwise stated, and would occur within the life of the plan (10 to 12 years); long-term impacts would occur over a 20-year period.

3. Proposed management actions would be analyzed under the assumption that the PRMP would be fully implemented and that adequate funding and staffing would be available for implementation.

4. No significant impacts would occur to prime and unique farmlands, topography, coal, air quality, climate, fire management, and waterpower and

reservoir storage sites from management actions in the PRMP, and are, therefore, not discussed in detail.

5. Effects, for the purpose of this analysis, would be the net unavoidable changes and impacts to a resource or resource use after mitigation.

The stated net unavoidable effects would be monitored and evaluated during the life of the plan. Where necessary, adjustments in the actions would be made to achieve the minimum level possible of consequential effects based on the data from plan action monitoring.

Effects from actions not covered in this plan, or from effects or actions that are impossible or difficult to predict, would be analyzed as needed through plan amendments/environmental assessments or environmental impact statements. This additional analysis would be done in accordance with Bureau planning/environmental guidance, including with appropriate public input, prior to BLM consideration for approval of that action.

CHAPTER FORMAT

Chapter Five is presented in two sections, with the first section, titled **IMPACTS OF THE PROPOSED RESOURCE MANAGEMENT PLAN**, providing an analysis of the environmental consequences, or impacts, that would result from the implementation of management actions within the PRMP. The final section, **COMPARISON TABLE OF IMPACTS**, with Table 4-1, is a comparison of the impacts from the PRMP and the alternatives addressed in the DRMP.

The section of this chapter titled **IMPACTS OF THE PROPOSED RESOURCE MANAGEMENT PLAN** is subdivided by the effected resources or resource uses. Impacts are then described as (1) Impacts from Proposed Management Actions, and (2) Cumulative Impacts (where cumulative impacts are not presented separately, they would be the same as the impacts from the proposed management actions in the PRMP.)

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The analyses of impacts are presented as *Impacts on a resource/resource use that would result from a proposed management action or actions*. For example, *impacts on wildlife habitat management would result from proposed off-highway vehicle management*.

At the conclusion of the discussion of the consequences of implementing the PRMP, Short-Term Uses vs. Long-Term Productivity, and Irreversible or Irrecoverable commitments of Resources are discussed.

IMPACTS OF THE PROPOSED RESOURCE MANAGEMENT PLAN

IMPACTS ON SOCIAL AND ECONOMIC CONDITIONS

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Locatable Minerals Management. Any increase in operating costs because of plans of operations being required would lower the potential for economic production. These requirements would not have measurable social or economic impacts on the Planning Area.

Impacts from Oil, Gas, and Geothermal Management. The Planning Area would not experience measurable social or economic impacts because of the low potential for occurrence of these resources.

Impacts from Wildlife Habitat Management. Increases in forage supply could translate into increases in game populations and in associated recreational activities, which could lead to slight increases in Planning Area income and employment.

Impacts from Livestock Grazing Management. Eliminating grazing in certain areas and not allocating any additional forage to livestock would reduce present preference by 524 AUMs. Any decreases in AUMs could result in financial losses for the affected ranching operations, and possibly could lead to decreases in Planning Area income and employment. Increased labor costs would or could result from increased or

more intensive management in order to achieve stubble height requirements.

Impacts from Forest Management. The potential sale of 1,200 MBF of commercial timber would support area income and employment and produce \$30,000 in federal revenue. On the other hand, 530 MBF of potential harvest would not be available for production and would mean a potential loss of \$13,000 of federal revenue.

Impacts from Recreation Management. The economic benefits from recreation opportunities would be medium to high, but unmeasured, and would depend on the area of the impact. Benefits would occur in those businesses providing tourist and recreation sales and services. The counties are dependent on tourism related incomes. The counties would receive a positive impact to income and employment from a 40% increase in recreation activity.

CUMULATIVE IMPACTS ON SOCIAL AND ECONOMIC CONDITIONS

The cumulative impact on the local economy is likely to be beneficial. The actual impact is localized but not presently quantified.

IMPACTS ON LOCATABLE MINERALS

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Locatable Minerals Management. Identifying 674,540 acres of federal mineral estate, of which 105,368 acres have a high likelihood for the occurrence of locatable minerals, as open to mineral entry and location would make these lands available for exploration and development under the general mining laws.

Impacts from Withdrawals. Withdrawing 54,027 acres of federal mineral estate from mineral entry and location would preclude any possible mineral exploration or development of these lands while the withdrawals are in effect. These lands would be

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withdrawn for protection of recreation and scenic (53,255 acres), and riparian (395 acres) values, and for R&PP classifications and agency protective withdrawals (362 acres). The lands which would be withdrawn contain about 5,160 acres with a high likelihood for the occurrence of locatable minerals.

IMPACTS ON OIL, GAS, AND GEOTHERMAL RESOURCES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Oil, Gas and Geothermal Management. Managing 674,169 acres of federal oil and gas estate as open to the leasing of fluid minerals would result in these resources being available. About 46,007 acres not being available and 51,152 acres with stipulations would result in little impact to the oil and gas program because of little likelihood for the occurrence of these resources.

IMPACTS ON SALEABLE MINERALS

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Saleable Minerals Management. The availability of 665,712 acres of federal mineral estate for mineral material disposal would more than satisfy the current demand of 12,500 cubic yards annually and meet the anticipated future demand. Not permitting the disposal of saleable mineral materials on 61,855 acres of federal mineral estate, or implementing seasonal closures for mineral material disposal on 172,087 acres of federal mineral estate, would not result in any significant impact due to the amount of materials which would remain available.

IMPACTS ON SOILS AND WATER RESOURCES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Soil and Water Resources Management. The continued implementation of the "Long Gulch Sediment Control and Riparian Habitat Improvement Project" would continue to reduce downstream sediment yields by up to 300 tons per year, increase vegetation production for watershed protection, improve the hydrologic functions of the riparian zone by raising the alluvial water table, and provide some downstream flood control benefits by reducing peak flows from runoff events. Erosion control projects, including those primarily designed to increase plant basal cover on uplands, would indirectly result in improved watershed conditions. Securing instream flows, where appropriate, would protect existing fisheries. Maintaining roads and existing water source developments in good condition would reduce erosion and sedimentation.

Impacts from Locatable Minerals Management. If mineral development occurs on 674,540 acres in the Planning Area identified as open to mineral entry and location, increased sedimentation and physical damage to stream beds or banks could potentially result. These impacts would most likely occur somewhere within the 105,368 acres that have a high likelihood for the occurrence of locatable minerals. Physical disturbance to stream channels and increases in sedimentation would be greatest from placer mining operations. Heavy metal contamination of surface water is possible from mine water discharges and spoil-pile runoff. Heavy metal pollution is usually associated with mine drainage resulting from the oxidation of pyrite. The highest potential for this situation to occur is on lands south and west of Lake City and 1,200 acres near Iris and Midway. Underground mining operations create the potential for ground water aquifer dewatering and mixing of water from different aquifers, diminishing both groundwater quantity and quality.

Impacts from Oil, Gas, and Geothermal Management. Minor increases in sediment yields would result from surface disturbance on 25 acres related to developing one or two wells on lands open to leasing under timing limitations or standard terms (634,640 acres). The potential for increased yields from these activities, such as road, drill pad, or utility

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construction, would be greatest on approximately 25 acres of disturbance within 487,388 acres of public lands containing soils with an erosion potential class greater than moderate. Accidental fluid discharges, such as produced water, during drilling operations, could contaminate surface waters and soils.

Lease closures on 46,007 acres, no surface occupancy stipulations on 26,205 acres, and controlled surface use stipulations on 13,124 acres that would prohibit any oil and gas related surface disturbance would prevent these potential impacts from occurring on those lands.

Impacts from Saleable Minerals Management. Surface disturbance from mineral material disposal would increase erosion and sediment production, and decrease soil productivity. Operations in close proximity to perennial water courses would have the potential effect of destabilizing and altering natural stream channels and disrupting the beneficial values of floodplains. Springtime seasonal stipulations in this alternative for this activity would lessen potential impacts by eliminating vehicle use and disturbance in wet areas.

Impacts from Riparian Zone Management. Managing riparian areas to improve conditions, and to enhance natural values, especially by implementing projects designed to improve stream hydrologic functions, would result in improved stream channel stability, water quality and quantity, and floodplain duration.

Impacts from Special Status Plant and Animal Species and Habitat Management. Stipulations in this alternative aimed at controlling surface-disturbing activities, such as mineral material disposal and rights-of-way construction, would minimize accelerated sediment yields and prevent degradation to local surface water quality conditions.

Impacts from Wildlife Habitat Management. Vegetation treatments and other wildlife management actions designed to increase shrub densities and otherwise improve habitat quality on uplands and to protect, restore, and enhance riparian areas would result in improved hydrologic, soil erosion, and watershed conditions on these areas.

Impacts from Livestock Grazing Management. Implementing range readiness criteria, total forage utilization levels, and minimum stubble heights would result in planning area-wide improvements in general watershed and hydrologic conditions, stream channel stability and soil erosion rates. Short-term sediment yield increases expected from vegetation treatments would be more than offset by the new available forage being used first to satisfy watershed objectives.

Managing 320 acres of public land in the Wildcat Creek drainage as unavailable for livestock grazing would help maintain and protect the quality of Crested Butte's municipal water supply.

Developing new, or relocating existing water sources to reduce livestock utilization in riparian areas would result in localized hydrologic and soil conditions being improved.

Impacts from Forest Management. Harvests of forest products and associated road construction would increase sediment production and soil compaction and erosion. Limiting road construction in riparian areas would maintain the existing soil and hydrologic conditions. Erosion control objectives and mitigating measures required in all timber harvest activity would reduce sediment production and soil compaction and erosion, and other impacts to water quality and hydrology. Requiring riparian values to be maintained during timber harvests would prevent additional disturbance, and allow existing soil and hydrologic functions to be maintained.

Impacts from Recreation Management. Sediment yields and erosion rates would be reduced as a result of 9,923 fewer acres that would be open to OHV use and 5,066 more acres on which OHV use would be limited to designated routes (either seasonally or year-long).

Impacts from Transportation and Access. Acquiring access into 12 areas for better resource management would indirectly improve soil and hydrologic conditions. Some increase in sediment yield would occur if these actions result in new road construction or improvement or maintenance of existing roads.

Impacts from Rights-of-Way Management. Excluding rights-of-way development on 51,406 acres,

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identifying 85,387 acres as avoidance areas, and seasonally restricting rights-of-way construction on 155,870 acres would result in accelerated erosion and sediment yields being minimized.

Impacts from Areas of Critical Environmental Concern. Limitations to surface-disturbing activities as a result of special management attention for protection of various resources on 42,342 acres within six ACECs would maintain or improve water quality and maintain or decrease accelerated erosion and sediment yields.

CUMULATIVE IMPACTS ON SOILS AND WATER RESOURCES

Overall hydrologic functions of riparian areas would be expected to improve. Future water quantity protection would be provided on 113 miles of fisheries if minimum stream flows are secured. Sediment and erosion rates would be expected to decrease where surface-disturbing activities, including OHV use, are reduced, where total forage utilization levels are implemented, and where plant basal cover objectives are achieved. Oil and gas no surface occupancy and controlled surface use stipulations, and closing areas to leasing could prevent soil erosion and sedimentation. Cumulative impacts from one or two wells, on a Planning Area-wide basis, would not be significant.

IMPACTS ON RIPARIAN ZONES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Riparian Zone Management. Overall riparian conditions would be improved and natural values would be enhanced. Limiting road construction and mitigating water source developments would minimize removal of vegetation and help improve riparian conditions. Requiring mitigating measures in all plans for surface-disturbing activities would help reduce site specific riparian area deterioration. Restricting potential oil and gas development and associated surface disturbance under a controlled surface use stipulation would protect riparian vegetation in Unit 14, and prevent removal of sage grouse brood rearing habitat as a result of these activities.

Impacts from Locatable Minerals Management. Existing and proposed withdrawals that segregate the federal mineral estate from mineral entry and location would protect about 117 miles of identified riparian zones from potential vegetation loss and other disturbances associated with mining locatable minerals. About 33 of these miles are within areas having a high likelihood for the potential for the occurrence of locatable minerals. The remainder of identified riparian zones, about 617 miles, would be open to mineral entry and location, and if mining were to occur, some loss of vegetation and other mining associated disturbances could occur. About 96 of these miles are within areas with a high potential for the occurrence of locatable minerals. Reclamation requirements would limit these impacts to the short-term.

Impacts from Saleable Minerals Management. Damage to and removal of the riparian vegetation type as a result of surface disturbance from mineral material disposal would be minimized by mitigating measures that would limit disturbance to the short-term.

Impacts from Soil and Water Resource Management. Vegetation treatments designed to increase plant basal cover and reduce accelerated soil erosion would enhance riparian areas by reducing the magnitude of flood waters and sediment delivery. Acquisition of water rights, where appropriate, including instream flows, would improve the overall condition of riparian areas by improving the dependability of surface and sub-surface water. Mitigation measures required for erosion reduction in all surface-disturbing plans would indirectly help reduce riparian area deterioration.

Impacts from Wildlife Habitat Management. The improvement in upland and riparian areas through proposed management and vegetation treatments would maintain and help improve the condition of riparian areas. Managing approximately 58 miles of fishery streams in unit 15 to improve their condition would indirectly help improve overall riparian zone conditions.

Acquisition of instream flow water rights along 113 miles of fishery stream would indirectly enhance and help improve the overall condition of riparian vegetation along these streams. Implementing mitigation required in all plans for surface disturbance

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involving fishery streams would indirectly help maintain or reduce riparian area deterioration.

Impacts from Livestock Grazing Management. Implementing livestock grazing management actions, including increased use supervision, limits on total forage utilization, a cooperative weed-control program, minimum stubble heights, and range readiness would result in an improvement in plant vigor which would lead to healing and building of streambanks while down-cut or incised stream channels would stabilize. In the mid to long term, some riparian areas could expand in size. The elimination of livestock grazing, on about 2,700 suitable acres in riparian zones, including fall use in some areas, and the elimination of some season-long grazing would directly result in improved plant vigor, diversity and composition, and an increase in above-ground biomass; streambanks would further stabilize, groundwater recharge would increase, and water tables would rise. Implementing these actions would help achieve an improved condition in riparian zones. The allocation of new or additional forage from vegetation treatments to meet watershed needs first would also improve riparian areas.

Impacts from Recreation Management. The construction of recreation facilities and subsequent use in, or adjacent to, riparian areas would cause less than 50 acres of loss or deterioration of vegetation.

Approximately 71 miles of riparian zones in the 47,762 acre Powderhorn Primitive Area SRMA would be protected from rutting and destruction of vegetation and streambanks, as a result of continuing to prohibit motorized vehicular traffic in this unit. Riparian areas within approximately 93,000 acres where motorized traffic is limited to designated routes yearlong would also be protected from rutting and destruction of vegetation and streambanks.

Impacts from Transportation and Access. The acquisition of proposed easements would facilitate access for riparian management in 12 areas.

Impacts from Acquisition of Non-Federal Lands. Acquisition of non-federal lands containing riparian zones would enhance riparian management on public land and would prevent development of these areas.

Impacts from Rights-of-Way Management. Excluding rights-of-way on 51,406 acres would protect riparian zones on these lands from rutting, compaction, streambank deterioration and channelization. Rights-of-way construction, seasonal stipulations and required rehabilitation would help reduce vegetation and soil damage and removal. Designating 85,387 acres as avoidance areas would also help reduce disturbance from rights-of-way construction. Implementing required mitigation from surfacing-disturbing rights-of-way in the remainder of the Planning Area would also minimize disturbance and vegetation removal.

Impacts from Water Power and Storage Reservoir Sites. Construction of reservoirs on inventoried and potential sites would result in the loss of riparian vegetation.

CUMULATIVE IMPACTS ON RIPARIAN AREAS

Current and proposed withdrawals, vegetation treatments and management strategies to reduce soil erosion, intensive riparian management, total forage utilization limits, fall livestock use limits, and restrictions on logging procedures would act synergistically, resulting in stabilization and improvement in the majority of the 14,933 acres of riparian systems in the Planning Area.

IMPACTS ON SPECIAL STATUS PLANT AND ANIMAL SPECIES AND HABITAT

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Special Status Plant and Animal Species and Habitat Management. Designation and special management of the 4,565 acre South Beaver Creek ACEC would help to protect the existing populations and potential habitat of skiff milkvetch from accidental destruction and would encourage research and special studies designed to increase our knowledge about this species.

Designation and special management of the 5,947 Redcloud Peak ACEC would help to protect the existing population and potential habitat of the Uncompahgre fritillary butterfly from accidental destruction and would

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encourage research and special studies designed to increase our knowledge about this species.

Restricting surface-disturbing activities in these ACECs would further prevent accidental loss of species and habitat.

Impacts from Locatable Minerals Management. Mining activity could result in accidental loss or removal of skiff milkvetch or Uncompahgre fritillary butterfly habitat, or other listed or classified species habitat. Required plans of operation would reduce this likelihood, however.

Impacts from Oil, Gas, and Geothermal Management. Oil and gas drill pad, road, and utility construction within 634,840 acres that would be open to leasing under standard terms and conditions or with seasonal stipulations, could potentially result in the accidental destruction of special status species or habitat. These species would be protected from accidental destruction from potential oil and gas related activities on 46,007 acres that would be closed to leasing, on 26,205 acres that would be subject to no surface occupancy stipulations, and on 13,124 acres subject to controlled surface use stipulations, (including known populations and potential habitat of skiff milkvetch and the Uncompahgre fritillary butterfly on federal oil and gas estate on 6,130 acres of public land in the proposed Redcloud Peak and South Beaver Creek ACECs).

Impacts from Saleable Minerals Management. Not permitting the disposal of mineral materials on 61,855 acres would prevent the accidental loss/removal of classified or listed habitat or species from surface disturbance from mineral material disposal on these lands. On-site examinations and mitigation required on the remainder of public lands for this discretionary action would further help to prevent accidental loss of species or habitat.

Impacts from Livestock Grazing Management. The elimination of domestic sheep grazing within the South Beaver Creek ACEC and intensive management of livestock grazing in the Redcloud Peak ACEC would prevent or help prevent accidental loss of special status habitat and species in these areas. Implementing minimum stubble heights in riparian zones would

improve habitat conditions for whooping and sandhill cranes, bald eagles, yellow billed cuckoos, and skiff milkvetch.

Impacts from Recreation Management. Limiting OHV use to designated routes and trails yearlong in skiff milkvetch and Uncompahgre fritillary butterfly habitat would help prevent the accidental destruction of the species and their habitat from OHV use.

Impacts from Rights-of-Way Management. Designating and managing public lands in the Redcloud Peak ACEC as a rights-of-way avoidance area and implementing rights-of-way location restrictions on public lands in the South Beaver Creek ACEC containing skiff milkvetch populations would help prevent accidental loss of these habitats and species from this land use.

Impacts from Acquisition of Non-Federal Lands. Acquiring non-federal lands which contain colonies of skiff milkvetch would maintain the present population and increase the population by 35% on public lands.

CUMULATIVE IMPACTS ON SPECIAL STATUS PLANT AND ANIMAL SPECIES AND HABITAT

Restrictions on surface disturbance, including closing areas to oil and gas leasing, controlled surface use stipulations, and no surface occupancy oil and gas stipulations, special designations, limiting OHV traffic and implementing restrictions on livestock grazing and rights-of-way location would protect and enhance habitat for special status species and habitat and would help prevent accidental destruction or loss of these species and their habitat where they might occur in these areas.

Oil and gas drill pad, road, and utility construction on lands that would be open to leasing under seasonal stipulations or standard terms and conditions, could potentially result in the accidental destruction of special status species or habitat areas. The accidental destruction would potentially result from approximately 25 acres of surface disturbance related to developing one or two oil and gas wells.

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IMPACTS ON TERRESTRIAL WILDLIFE AND HABITAT

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Wildlife Habitat Management. Land treatment projects, water developments and managing elk and deer populations at recommended levels would increase wildlife forage production, availability, and quality to help meet CDOW long-range or big game elk and deer herd goals, within the carrying capacities of the habitat. Improvement in habitat quality would facilitate animal distribution, reduce stress, and improve forage utilization in some areas. Minimizing disturbances within big game crucial winter range and elk calving areas would reduce stress and fetal mortality, and increase calf survival.

Designating the 28,275 acre West Antelope Creek ACEC and implementing special management attention would improve and increase big game crucial winter range forage, plant vigor, carrying capacity, and thermal and hiding cover. Limiting big game forage utilization to a maximum of 50% of key forage species, and working with CDOW to temporarily reduce deer numbers on 3,302 acres of crucial big game winter range in GMU 64 near Cimarron would improve elk and deer forage conditions and carrying capacities on those lands. Bighorn sheep and pronghorn antelope habitat and herd management in this alternative would potentially increase populations of these animals to 500 of each species, an increase of 350 and 200 respectively.

Any land or vegetative treatments or projects that occur on 28,147 acres of pronghorn antelope habitat in unit 11 would be designed to improve forb composition of sagebrush communities for sage grouse and pronghorn antelope.

Land treatment or other projects designed to increase understory vegetation within sagebrush communities would improve sage grouse nesting cover, provide nest structure, and increase nesting success on 48,474 acres of high production areas in unit 11. Improving habitat on public land would support approximately 9,000 sage grouse. Seasonal and surface disturbance restrictions

would protect 27 known leks from destruction and reduce stress and disturbance for strutting sage grouse on about 3,402 acres surrounding these leks.

Increasing vegetative structure and cover within riparian and sagebrush habitat types would increase cover, nesting habitat, foraging areas, and plant species diversity for a variety of wildlife species.

Impacts from Locatable Minerals Management. Withdrawing federal mineral estate from entry and location would preclude loss of 6,545 acres of big game crucial winter range, 3,281 acres of bighorn sheep habitat, 2,074 acres of elk calving areas, and a variety of other habitat on these lands. Requiring plans of operations to be submitted for locatable mineral activity within 38,727 acres in ACECs in units 5, 7, and 8 would provide greater potential for reducing loss of habitat and disturbance to wildlife.

Road construction, surface disturbance, and increased human activity associated with mining activity would eliminate habitat, alter use patterns, increase stress and disrupt nesting and breeding of a wide variety of game and non-game species. The impact of mining activities would potentially be greatest where bighorn sheep habitat, crucial elk and deer winter range and sage grouse lek areas occur on lands with a high likelihood for the occurrence of locatable minerals.

Impacts from Oil, Gas, and Geothermal Management. In the event oil and gas activities occur, timing limitations on 11,823 acres of elk calving areas would, during critical periods necessary for winter survival or successful reproduction of these species, prevent potentially significant, site-specific or localized impacts from surface or other disturbances related to developing one or two wells. Elk calving areas are generally small in size and are selected by elk for particular characteristics. The stipulations would also prevent stress and excessive energy expenditure, mortality and birth losses, ensure the survival of calves, and help maintain the overall condition and health of these animals on these lands.

No surface occupancy stipulations would similarly protect bighorn sheep and their habitat on 15,407 acres along narrow, year-round habitat areas in the Cebolla

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and Cochetopa Creek areas from potentially significant surface or other disturbances related to one or two wells.

Sage grouse on 3,402 acres at lek sites would also be protected from similar disturbances by no surface occupancy stipulations. Approximately 2,500 acres of sage grouse brood rearing habitat in riparian areas in unit 14 would be protected from potential surface and other oil and gas related disturbances by a controlled surface use stipulation.

These controlled surface use, no surface occupancy stipulations, and one area being closed to leasing, would coincidentally, prevent similar oil and gas related disturbances from occurring on an additional 6,889 acres of crucial big game winter range.

Big game and habitat on approximately 96 percent of the crucial big game winter range in the Planning Area on public lands containing federal oil and gas estate (170,511 acres) would be subject to potential surface and other related disturbances from one or two wells during critical periods, including within the proposed West Antelope Creek ACEC. Much of the elk and deer crucial winter range in the Planning Area occurs on fairly gentle terrain (sparsely vegetated, and dissected by narrow, shallow drainages) that results in long site distances and few sound barriers that could serve as buffers. The stress from these surface and other disturbances could, where they occur on these lands, result in potentially reduced weights of big game species and their increased susceptibility to disease. Construction of roads, drill pads, and utilities, and increased road use and human activity would tend to repel big game species, creating disturbance, and potentially resulting in forage over-utilization on other lands. The BLM would, if operations or activities are planned during December 1 through April 30, negotiate with lessees or operators to attempt to obtain a rescheduling of these activities to avoid disturbances within crucial big game winter range during this time, especially in the proposed West Antelope Creek ACEC. This postponement could be in addition to the 60-day delay authorized in standard oil and gas lease terms.

Impacts from Saleable Minerals Management. Not authorizing mineral material disposal in all of units 2, 4, 5, 6, 8, and 9, and in parts of units 1, 10, 13, 15,

and 16 would preclude related surface disturbance on 3,664 acres of big game crucial winter range, 9,023 acres of bighorn sheep range, and 185 acres of elk calving areas, and a variety of other wildlife habitats.

Seasonal restrictions on disposal would prevent related surface disturbance to habitat and species during critical periods on 163,593 acres of crucial winter range, 4,741 acres of elk calving areas, 14,817 acres of potential bighorn sheep lambing areas, 3,402 acres of sage grouse nesting habitat, 2,417 acres of sage grouse brood rearing habitat, and a variety of other habitats on these lands.

Impacts from Soil and Water Resources Management. Increasing ground cover in the sagebrush vegetation type would improve forage, hiding, and nesting cover for sage grouse, pronghorn antelope, bighorn sheep, and other non-game species. Land treatment projects which result in decreasing sagebrush cover below 25% would eliminate these areas from use by sage grouse for nesting or strutting grounds, and would decrease sage grouse wintering habitat, and possibly grouse populations. Construction of projects designed to decrease soil erosion and improve water quality would improve sage grouse brood rearing habitat, crucial elk and deer winter range and nesting habitat for non-game species.

Impacts from Riparian Area Management. Moving watering facilities from riparian areas where impacts are occurring would improve these areas for sage grouse brood rearing, thermal habitat for elk, deer, and non-game habitat, and would improve livestock distribution. Moving facilities at least 1/8 mile from riparian zones would result in the greatest amount of improvement.

Limiting road construction in riparian zones to an absolute minimum, requiring road crossings to be perpendicular when permitted, and moving or modifying existing roads contributing to excessive erosion would prevent loss of big game crucial winter range, important sage grouse habitat, and reduce disturbance to wildlife from human activity.

Reclaiming or restoring riparian areas would result in improved forage and cover for young sage grouse and many non-game species.

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Impacts from Special Status Plant and Animal Species and Habitat. Limiting OHV use to designated routes in the South Beaver Creek ACEC, unit 8, for skiff milkvetch management, would result in less disturbance yearlong from OHV use on 1,960 acres of elk and deer crucial winter range, and on sage grouse habitat.

Impacts from Livestock Grazing Management. Development of intensive grazing systems with an emphasis on increasing herbaceous vegetation within sagebrush communities would increase cover for sage grouse nesting habitat, structure for non-game and forage for pronghorn antelope.

Limiting total forage utilization to maintain a 4" stubble height along about 83 total miles of riparian areas in units 2, 13, 14 (seasonally), and 15 on various allotments would improve cover and forage quality for elk, deer, sage grouse and especially young sage grouse, pronghorn antelope, and non-game wildlife, as would managing forage utilization on uplands to no more than 40-60%, including within treated areas. Sage grouse populations would also increase as a result of these actions.

Not authorizing domestic sheep grazing in Allotment 6112 in Unit 2, and all of unit 10 would prevent the transfer of disease to bighorn sheep from domestic sheep and would provide more forage for big game. Not authorizing any livestock grazing in the North Willow Creek riparian zone (temporarily), and in Allotment 6200 in unit 7 would provide forage and improve forage conditions on big game winter range, prevent disease transfer to bighorn sheep from domestic sheep and would eliminate potential livestock trespass into the Sapinero State Wildlife Area. Eliminating domestic sheep grazing in units 3 and 8, cattle grazing along Cochetopa Creek riparian area in unit 3, in unit 9, and temporarily along 1/4 mile of Los Pinos Creek in unit 13 would improve and provide more habitat, cover, and forage for a variety of wildlife species.

Seasonal restrictions on domestic sheep grazing in Allotment 6056 in GMU 64 (unit 12) and in all of unit 14 would provide more forage and cover for big game and sage grouse during critical periods. Excluding or restricting range treatments or improvements on 4,294 acres and 201,644 acres, respectively, and restricting

livestock grazing management on 207,951 acres, implementing changes in grazing systems, and better vegetation management, would enhance effectiveness of wildlife management objectives on these lands.

Forage allocation reductions or adjustments in grazing systems, seasons of use and kind of livestock, Allotment categorization, and possibly removal or modification of range improvements that could be made in order to achieve proper forage utilization levels or ranges on uplands or riparian zones, could result in long-term increases in forage quality and cover for a variety of wildlife species and habitats.

Continued fall cattle grazing within big game crucial winter ranges in riparian zones would reduce forage for wintering elk and deer. Continued livestock grazing at existing allocations in the Powderhorn Primitive Area SRMA and in Allotments 6208, 6300 and 6309, could result in reduced forage and big game forage quality. Domestic sheep grazing in bighorn sheep ranges south and west of Lake City would result in less forage for, and disease transfer to, bighorn sheep, continued low bighorn sheep numbers, and potentially bighorn sheep elimination from this area.

Impacts from Forest Management. Prohibiting harvesting from May 1 through June 30 on 5,389 acres of suitable commercial forest lands in elk-calving areas would prevent disturbance to elk from logging during calving season. Harvests in elk calving areas would reduce hiding cover for pregnant and young elk, potentially resulting in the areas not being used as calving areas.

Maintaining sufficient elk hiding cover parallel to logging roads and along the perimeter of clear cuts would allow elk the opportunity to use forage produced in the clear cuts without being disturbed from activity on nearby roads, and would screen wildlife from human activity, thereby helping reduce stress and disturbance to animals.

Requiring riparian zone values to be maintained during timber harvests would protect large trees for non-game wildlife and maintain a variety of habitats. The prescribed management in Appendix A for non-game wildlife regarding timber harvests would provide snags

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for nesting habitat, perch trees for raptors and brush piles and logs for small mammals.

Harvesting ponderosa pine and Douglas fir on a sustained yield basis could decrease big game thermal and hiding cover at the rate of 100-150 acres annually.

Development of additional roads in elk summer range would also decrease hiding cover, and increase human activity, potentially resulting in changes of traditional use patterns.

Impacts from Recreation Management. Development of a visitor and administrative center in Lake City could result in more effective educational programs about wildlife and habitat to the visiting public.

Designating 600 acres of public land within the Sapinero State Wildlife Area as closed to OHV use would ensue OHV management consistency with the adjoining CDOW land and would improve management of the general area for wildlife. Continuing to limit OHV use from December 1 through March 31 to designated routes, if necessary, on 56,740 acres of crucial elk and deer winter range North of U.S. Highway 50 would prevent disturbance to these animals during the most critical portion of the year.

Development of recreation facilities and the associated increased visitor use within the Alpine Triangle SRMA would continue to displace bighorn sheep and elk, especially along Henson Creek and the upper stretch of the Lake Fork of the Gunnison River, resulting in loss of habitat and utilization of forage species in other, more isolated, areas. Development of campsites and the associated increased use along the Cochetopa Creek would eliminate bighorn sheep use within 1/2 mile of these areas, and could deter raptors from using the area.

Impacts from Transportation and Access. Acquiring public road access into the Rock Creek Park area via Management Unit 10 and increasing human activity in a previously inaccessible area would disrupt bighorn sheep range and lambing areas, and would force the herd onto marginal habitat. Acquiring public access into elk summer ranges and elk calving areas could result in eventual timber harvests and road building for

logging, which would disturb elk, reduce habitat and cover, and increase human activity.

Impacts from Acquisition of Non-Federal Lands. The acquisition of private lands in crucial elk and deer winter range would prevent the loss of habitat through subdivision development and human activities.

Impacts from Rights-of-Way Management. Disturbances to species and habitat on about 40,613 acres of bighorn sheep range and 4,752 acres of crucial big game winter range would possibly be precluded as a result of designating rights-of-way avoidance areas in the Planning Area. Rights of way development and disturbance to species and habitat would be precluded on 135 acres at 27 sage grouse leks where rights-of-way are excluded. Seasonal stipulations on rights-of-way related construction would prevent disturbance on 134,751 acres of crucial big game winter range, 3,402 acres of sage grouse nesting habitat and 2,605 acres of brood rearing habitat, and 15,112 acres of potential bighorn sheep lambing areas during critical periods.

Impacts from Rights-of-Way Corridor Management. Construction of major utilities within two designated corridors would result in removal of wildlife habitat, the amount depending on necessary construction clearing.

CUMULATIVE IMPACTS ON WILDLIFE HABITAT

Removal of and disturbance to big game crucial winter range, elk-calving areas, and sage grouse habitat from vegetation treatments, logging, and potential locatable mineral activity would be partially offset by other resource management outputs and discretionary restrictions, stipulations, and habitat increases and better vegetation management throughout the Planning Area, especially in sagebrush and riparian zones.

Sage grouse and their habitat, and big game, including elk, deer, and bighorn sheep would be protected seasonally and yearlong at critical locations and periods in some areas from oil and gas related disturbances. In the event that oil and gas related activities occur within the Planning Area, wildlife species on 96 percent of the crucial big game winter range would potentially be subject to stresses from related human and surface

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disturbances, if the activities occur at important critical periods or locations. Cumulative impacts on elk and deer within crucial winter ranges from one or two oil and gas wells would not be significant on a Planning Area-wide basis. Disturbances to species and habitat from discretionary human related disturbances would be reduced on most habitat types during critical periods. Timber harvest and management guidelines would help improve game and non-game wildlife and habitats.

Increased forage and improved forage quality, and herd size management on crucial winter range would help meet CDOW's long-range elk and deer herd goals, and big game populations could be permitted to increase to eventual desired carrying capacities. Habitat would be available on public land to support approximately 9,000 sage grouse, 500 antelope, and 500 bighorn sheep.

Road densities could increase as a result of forest management, resulting in disturbance to species and removal of habitat. Removal and abandonment of habitat could occur as a result of constructing facilities, and increased recreation visitation.

IMPACTS ON FISHERY RESOURCES (AQUATIC HABITAT)

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Fishery Resources (Aquatic Habitat) Management. Implementing measures in all plans for surface disturbance to prevent or mitigate damage/loss of fishery stream channels and riparian habitat would result in maintaining or improving the conditions of fishery resources Planning Area-wide. Implementing fishery improvements and projects from activity plans would stabilize and restore stream banks and improve fishery resources as these plans are carried out. Acquiring instream flow water rights on 113 miles of fishery streams would insure sufficient water to maintain present fish populations.

Impacts from Locatable Minerals Management. Fishery streams within 54,027 acres withdrawn from mineral entry and location would be protected from localized loss of habitat or habitat quality reduction that could occur from mining-related surface disturbance.

Habitat loss due to sedimentation and channelization would be greatest if mineral development on the remainder of public lands were to occur in alluvial soils along or in streambanks.

Impacts from Saleable Minerals Management. Some sedimentation within fishery streams would result from mineral material-related surface disturbance on about 666,712 acres where disposal is authorized, but mitigation required for riparian areas, soils and water resources, and fishery streams would minimize the magnitude and longevity of impacts.

Impacts from Soil and Water Resources Management. Vegetation treatments designed to reduce soil erosion would enhance aquatic habitat by decreasing the amount and frequency of runoff and sediments entering streams.

Impacts from Riparian Zone Management. Restrictions on road construction and water source development and maintenance would limit vegetation loss, sedimentation, and erosion, and directly and indirectly maintain and improve fishery stream conditions.

Impacts from Wildlife Habitat Management. The improvement in upland and riparian areas through proposed management and vegetation treatments would maintain and help improve the condition of fishery streams.

Impacts from Livestock Grazing Management. Implementing livestock grazing management actions, including increasing use supervision, limits on total forage utilization, a cooperative weed-control program, minimum stubble heights, and range readiness would result in an improvement in plant vigor which would lead to healing and building of streambanks while down-cut or incised stream channels would stabilize. The elimination of livestock grazing, including fall use in some areas, and the elimination of some season-long grazing would result in improved plant vigor, diversity and composition, and an increase in above-ground biomass; streambanks would further stabilize, groundwater recharge would increase, and water tables would rise.

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The allocation of new or additional forage from range projects or treatments to meet watershed needs first would indirectly improve fishery streams.

Impacts from Forest Management. Excluding timber harvests in some areas, requiring riparian values to be maintained during all timber harvests, and implementing measures designed to protect and maintain watershed, soil, and vegetative resources during timber harvests would prevent riparian zone deterioration and indirectly and directly maintain fishery stream conditions.

Impacts from Recreation Management. The construction of recreation facilities and subsequent use in, or adjacent to, fishery streams would cause deterioration of habitat quality through vegetation removal and sedimentation. The areas affected by such development would be less than 50 acres.

Closing about 1,276 acres of riparian zones to OHV use and limiting OHV use on 3,927 acres to designated routes yearlong would prevent rutting and destruction of vegetation and streambanks, and indirectly maintain fishery conditions in these areas.

Impacts from Transportation and Access. The acquisition of proposed easements would facilitate access for fishery stream management in 12 areas.

Impacts from Acquisition of Non-Federal Lands. Acquisition of non-federal lands containing riparian zones would indirectly enhance fishery stream management on public lands and would prevent development of these areas.

Impacts from Rights-of-Way Management. Excluding rights-of-way from about 963 acres of riparian areas along fishery streams would protect these areas from rutting, compaction, streambank deterioration and channelization. Rights-of-way construction seasonal stipulations and required rehabilitation would help reduce vegetation and soil damage and removal. Designating 85,387 acres as avoidance areas would also help reduce disturbance from rights-of-way construction. Implementing required mitigation from surface-disturbing

rights-of-way in the remainder of the planning area would also minimize fishery stream disturbances.

Impacts from Withdrawals. Protective withdrawals would prevent loss or deterioration of fishery streams.

Impacts from Water Power and Storage Reservoir Sites. Construction of reservoirs on inventoried and potential sites would result in the loss of affected fishery streams and habitat.

CUMULATIVE IMPACTS ON FISHERY RESOURCES (AQUATIC HABITAT)

Current and proposed withdrawals, vegetation treatments and management strategies to reduce soil erosion, intensive riparian management, forage, utilization limits, fall livestock use limits, and restrictions on logging procedures would act synergistically, resulting in improvement of the majority of the 14,933 acres of fishery streams in the Planning Area.

IMPACTS ON LIVESTOCK GRAZING MANAGEMENT

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Livestock Grazing Management. Livestock forage in the Planning Area would be expected to improve in quantity and quality over the life of the plan. This would occur as a result of achieving proper forage utilization levels in riparian areas and on uplands, implementing activity plans, such as AMPs or CRMAs, maintaining existing range treatments or improvements in some units, and indirectly, by improved livestock distribution patterns by implementing 4" and 2-1/2" minimum stubble heights in riparian areas.

Impacts from Soils and Water Resource Management. Vegetation treatments designed to increase plant basal cover, and implementing soil erosion and watershed mitigation measures would increase forage and help improve livestock distribution over the life of the plan.

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Impacts from Riparian Zone Management. Managing livestock utilization to maintain a 4" minimum stubble height for key herbaceous forage species on 1,494 suitable acres (88 miles) of riparian zones important for fisheries and sage grouse brood habitat in units 2 and 15 would potentially reduce livestock allocations by about 149 AUMs on several Allotments. More intensive supervision and operator management would be required in these areas, as well as in unit 14 (riparian sage grouse brood-rearing habitat) seasonally, in order to maintain these minimum stubble heights.

Temporarily eliminating livestock grazing on about three miles, or 76 acres, of the North Willow Creek riparian zone to improve big game forage in unit 7 would reduce livestock utilization by about 38 AUMs. Temporarily eliminating livestock grazing on 1/4 mile of the Los Pinos creek riparian zone to improve this fishery in Unit 13 would reduce livestock allocations by a total of about 20 AUMs on the 40-acre parcel this stream segment crosses. Continuing to not authorize livestock grazing on 7 miles of Henson Creek in unit 15 and on 7 miles in unit 1 would prevent potential damage to riparian, recreation, and scenic values.

Requiring range improvements or treatments and livestock grazing management to meet riparian area objectives for fishery resources within riparian zones along all public land in unit 15, about 4,275 acres, and public land in riparian zone unit 14 for sage grouse brood habitat improvement, about 2,667 acres, would probably increase costs and time for planning and implementation of range treatments or improvements, or possibly operator's costs for livestock management on these lands.

Not authorizing grazing or watering on about 200 acres in the riparian area along Cochetopa Creek in unit 3 in order to help improve recreation settings would make these lands unavailable for future grazing use. Not authorizing domestic sheep grazing on 2,272 suitable acres in unit 3, for the same reason, would require a change in the kind of livestock to permit cattle only to use these lands.

Implementing riparian zone management actions and other mitigation would, over the life of the plan, improve and increase available forage.

Impacts from Special Status Plant and Animal Species and Habitat. Requiring domestic sheep grazing in the 5,960-acre unit 5 to be controlled in order to prevent destruction of Uncompahgre fritillary butterfly habitat would increase operator's management intensity, and potentially costs, and would necessitate closer use supervision.

Restricting surface disturbance to protect butterfly habitat in unit 5 would preclude large-scale range treatments or projects on 1,072 suitable acres.

Not authorizing domestic sheep grazing, or vegetative treatments or maintenance of treatments in unit 8 in order to protect skiff milkvetch populations from trampling, sheep use, and destruction would require a change in the kind of livestock for a portion of Allotment 6311, and would preclude range treatments on about 3,222 acres.

Impacts from Wildlife Habitat Management. Maintaining existing wildlife treatments and developing new treatments on uplands and within riparian areas, allocating new available forage to meet watershed objective first, potentially reducing big game numbers in GMUs 54, 55, 551, and a part of GMU 64, and implementing other wildlife mitigation measures would result in improved livestock distribution and forage quality.

Not authorizing domestic sheep grazing in order to prevent disease transfer to bighorn sheep in Allotment 6112 in unit 2, and in parts of 14 Allotments in unit 10 would result in a change of kind of livestock to cattle only in affected Allotments. Eliminating all domestic livestock grazing on 827 suitable acres in Allotment 6200 in unit 7 and 9, and on lands managed by the NPS, in order to improve crucial big game winter range and to protect scenic values would reduce livestock allocations by 114 AUMs. Not authorizing domestic sheep grazing from October 15 through April 15 on 1,465 acres in GMU 64 in Allotment 6,056 to reduce forage competition with big game during the winter would reduce livestock allocations by 29 AUMs.

Restricting livestock grazing management and range treatments or improvements on 20,849 suitable acres in unit 7, and on 97,954 suitable acres within GMUs 55, 66, 67, and 551 in unit 12 for big game crucial winter

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range management, and on 35,852 acres of crucial sage grouse nesting area in unit 11 would possibly increase costs and time for planning and implementation, or operator's costs for livestock management.

Impacts from Fishery Resources (Aquatic Habitat Management). Pursuing and acquiring instream flow appropriations on 113 miles of fishery streams and implementing fishery resource mitigating measures in activity plans to improve upon or prevent damage to or loss of fishery stream channels and associated riparian resources would indirectly improve forage quantity and quality, over the life of the plan.

Other associated impacts from fishery resource management are discussed under Impacts from Riparian Zone Management.

Impacts from Forest Management. Commercial timber and woodland harvests would, over the life of the plan, increase forage and help improve livestock distribution on some of the 41,347 acres of suitable commercial forest lands and 23,615 acres of suitable woodlands available for harvest. Mitigating measures and harvest restrictions, especially within riparian areas, would help limit removal of forage in affected areas during harvesting of forest products.

Impacts from Recreation Management. Restricting range treatments or improvements, and managing livestock grazing to maintain recreation settings on 40,374 suitable acres in unit 2 would possibly limit future projects or preclude development of some projects, and possibly increase BLM's or operators' use supervision time or costs. Designation of an additional 5,415 acres of public land as closed to OHV traffic, and limiting OHV traffic on 46,170 suitable acres to designated routes yearlong (an additional 34,943 acres planning area-wide) would reduce livestock harassment and management concerns.

Impacts from Visual Resource Management. Management of livestock in Management Unit 4, the recommended American Basin ACEC, could result in a change of season of use, or possibly geographical restrictions on grazing, or elimination of grazing in some areas of the unit. Range treatments would be excluded on these lands.

Not authorizing livestock grazing on 402 suitable acres on Allotment 6200 (Dillon Pinnacles ACEC, unit 9) would reduce livestock allocations, the impact of which is discussed under wildlife habitat management. Range treatments would also be excluded.

Impacts from Transportation and Access. Acquiring access into 12 new areas would improve livestock grazing management, but 11 of the 12 would be for public access, which would result in some degree of additional livestock harassment, gates being left open, and vandalism to livestock facilities.

Impacts from Disposal of Public Lands. Disposal of 3,049 acres of public land that are grazed by livestock would reduce livestock allocations by 203 AUMs.

CUMULATIVE IMPACTS ON LIVESTOCK GRAZING MANAGEMENT

Eliminating or not authorizing livestock grazing, implementing minimum stubble heights and seasonal grazing restrictions and disposal of public lands would result in a net decrease of 524 AUMs in the planning area, and a total grazing preference of 46,904 AUMs. Long-term livestock forage conditions, vigor, and livestock distribution would be improved as a result of vegetative or other treatments and improvements in forage quality and quantity.

IMPACTS ON FOREST MANAGEMENT

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Forest Management. Intensive management of 41,347 acres of suitable commercial forest lands and 23,615 acres of suitable woodlands that would be available for harvest would result in potential annual harvests of 1,200 MBF of commercial timber, 490 cords of firewood, 400 wildings, and, on average, 300 Christmas trees. About 10,000 acres would be inventoried for Timber Production Capabilities Classification (TPCC) during the life of the plan.

Impacts from Riparian Zone Management. Maintaining or improving riparian values or wildlife during timber harvesting could potentially preclude

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harvest on about 640 acres of suitable commercial forest lands, potentially resulting in about 20 MBF not being available for harvest annually.

Impacts from Wildlife Habitat Management. Seasonal harvesting restrictions within elk calving areas would shorten an already abbreviated logging season. Designing sales to allow elk hiding cover along roads and clear cut edges could result in up to 500 acres or 15 MBF of suitable commercial timber not being available for harvest annually.

Restricting harvesting in ponderosa pine stands, and any surrounding raptor nest sites could preclude harvest on about 2,260 acres of suitable commercial forest lands potentially resulting in up to 68 MBF not being available for harvest annually.

Impacts from Livestock Grazing Management. Continued livestock grazing and trampling on about 400 acres of lands in need of reforestation, would result in these lands remaining classified as poorly stocked and regrowth being hampered.

Impacts from Recreation Management. Restrictions on timber harvests to enhance recreation management and ROS settings in the Powderhorn Primitive Area SRMA and Slumgullion Earthflow National Natural Landmark ACEC would eliminate harvesting on 13,632 acres and 80 acres respectively. This would result in about 400 MBF not being available for harvest annually.

Increasing recreational use on High Mesa would create a serious safety hazard along the switchbacks on the High Mesa Road between logging trucks and recreational vehicles.

Impacts from Transportation and Access. Acquiring access into four new areas for timber management would facilitate timber harvests on the affected public lands.

Impacts from Disposal of Public Land. About 153 acres of suitable commercial forest lands would no longer be in public ownership, resulting in about 3 MBF annually not being available for harvest.

Impacts from Fire Management. About 500 acres of suitable commercial forest lands could be destroyed in conditional suppression areas, resulting in 15 MBF not being available for harvest annually.

CUMULATIVE IMPACTS ON FOREST MANAGEMENT

Restrictions on timber harvests would eliminate sustained yield harvest on 17,765 acres of suitable commercial forest lands resulting in a loss of 535 MBF annually. A total of 41,347 acres of suitable commercial forest lands would be managed for sustained yield production which would result in an annual harvest of 1,200 MBF of commercial saw timber. An additional 4,353 acres of suitable woodlands would be available for harvest annually (total of 23,615 acres) potentially increasing annual harvest by 90 cords, for a total of 490 cords annually. Other forest products would also be available for harvest (Christmas trees, wildings, etc.).

IMPACTS ON RECREATION

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Recreation Management. Improved and additional campground and other recreation facilities, improved hiking trails, and increased interpretation and visitor contacts would enhance visitor use, and enjoyment and understanding of resources in the Planning Area. If a joint BLM/USFS visitor center is eventually constructed in Lake City, recreation management effectiveness and general public education and awareness of BLM management would be greatly improved in the Planning Area, especially in the south and west portions.

Designating and managing the Slumgullion Earthflow National Natural Landmark ACEC would result in special interpretive and other management attention being implemented in the unit which would help protect ACEC values.

Closing 600 acres in the West Antelope Creek ACEC, and Powderhorn Primitive Area SRMA to OHV use would help maintain ROS settings on 5,415 more acres. Limiting OHV traffic on 4,787 more acres, primarily

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south and west of Lake City to designated routes, would protect recreation and scenic values on these lands and would maintain ROS settings. Managing 363,993 acres as open to OHV use (9,923 fewer acres) would provide adequate quantities of land for OHV use.

Impacts from Locatable Minerals Management. Withdrawing 54,027 acres of federal mineral estate from mineral entry and location would preclude any surface disturbance from possible mineral exploration or development and would protect the integrity of recreation settings and experiences on these lands. Managing about 105,368 acres of land with a high potential for the occurrence of locatable minerals as open to mineral entry and location could significantly alter recreation settings and experiences in the Alpine Triangle SRMA. Locatable mineral activity and related surface disturbance on the remaining BLM surface estate over federal mineral estate could also alter recreation settings and experiences.

Designating 38,727 acres as ACECs (Redcloud Peak, West Antelope, and South Beaver Creek) would require plans of operation to be submitted for locatable mineral activity and would provide more control of surface disturbance and reclamation plans for recreation resources in these areas that would remain open to locatable mineral entry and location.

Impacts From Oil, Gas, and Geothermal Management. Closing the Powderhorn Primitive Area SRMA to leasing, and implementing controlled surface use and no surface occupancy stipulations on oil and gas activities would, by prohibiting or restricting potential surface and other disturbances from one or two wells, protect important recreation lands and resources and prevent potential alteration of recreation settings and experiences from potential oil and gas related surface and other disturbances on a total of 85,366 acres of public lands in the Planning Area, including within all of the Powderhorn Primitive Area and Cochetopa Creek Special Recreation Management Areas (SRMAs), in parts of the Alpine Triangle SRMA and the Gunnison Extensive Recreation Management Area, and in five recommended ACECs. These stipulations would also maintain hunting opportunities on these same lands as a result of these potential disturbances being restricted.

Surface and other disturbances related to developing one or two wells on the remainder of public lands in the Planning Area could have a negative impact on recreation where road, drill pad, and utility construction occurs in important recreation lands, such as Special Recreation Management Areas, or on other lands. The quality of the recreation experience would be lessened. These activities and facilities in a variety of ROS settings could result in these lands being managed for less restrictive ROS settings. Visitation in these areas by those seeking solitude would decrease. Increased access to remote areas could increase OHV activity and cause additional surface disturbance. The quality of scenic viewing would be lessened in some locations on these lands as a result of these activities. Quality of hunting could be lessened by these activities resulting in displaced animals or increased mortality in site-specific situations.

Impacts from Saleable Minerals Management. Not authorizing mineral material disposal on about 61,855 acres of public land in all of five proposed ACECs (units 4, 5, 6, 8, and 9), unit 2, and in parts of units 1, 10, 13, 15, and 16 would protect ROS settings and experiences from mineral material related surface disturbance on these lands. The remaining 665,712 acres of public land could undergo some degree of change in ROS settings and experiences wherever mineral material related surface disturbance occurs, but mitigation for this discretionary action would help minimize impacts.

Impacts from Riparian Zone Management. Improved condition of riparian zones through management from all disciplines would enhance the recreation setting and experience on these lands.

Impacts from Special Status Plant and Animal Species and Habitat Management. Limiting OHV use to designated routes on 4,565 acres in the proposed South Beaver Creek ACEC would restrict this use in an area previously open to OHV use.

Impacts from Wildlife Habitat Management. Wildlife habitat management objectives and restrictions would increase hunting related recreation activities and enhance recreation experiences by increasing numbers of watchable wildlife.

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Impacts from Fishery Resources (Aquatic Habitat) Management. Improvements in fisheries would increase fishing use and experiences by providing more and bigger fish.

Impacts from Livestock Grazing Management. Restricting domestic sheep grazing in the scenic 1,595 acre American Basin ACEC during the wildflower blooming season would enhance recreation settings and experiences for a large number of visitors.

Impacts from Visual Resource Management. Managing lands totalling 49,872 acres in the Powderhorn Primitive Area SRMA and the American Basin and Dillon Pinnacles ACECs under VRM Class I objectives, and managing lands at Hartman Rocks (6,000 acres) and on High Mesa (4,358 acres) under VRM class II and III objectives would maintain present ROS settings and could potentially enhance recreation experiences on these highly valued areas.

Impacts from Historical Resource Management. The identification, stabilization, and interpretation of historical resources would significantly enhance the setting and experience of recreation visitors.

Impacts from Transportation and Access. Acquisition of public access into eight areas and maintenance of existing routes would enhance recreation management effectiveness and permit access to more public land for recreational activities such as hunting, sightseeing, and OHV use previously precluded.

Impacts from Acquisition of Non-Federal Lands. The acquisition of inholdings and lands with significant recreation resources would expand recreational opportunities and would eliminate potential private development.

Impacts from Rights-of-Way Management. Excluding rights-of-way on 51,406 acres, managing 85,387 acres as avoidance areas, and excluding above-ground utilities on an additional 95,624 acres would prevent the lowering or ROS settings on these lands from surface disturbance and vegetation loss from rights-of-way construction.

Impacts from Rights-of-Way Corridors. Location of additional major above-ground rights-of-way in the

designated corridor along the Lake Fork of the Gunnison River near Blue Mesa Reservoir would lower ROS settings by decreasing scenic quality.

CUMULATIVE IMPACTS ON RECREATION MANAGEMENT

Improved recreation facilities and development of additional campgrounds would help to accommodate the anticipated 40% increase in the number of visitors to the Planning Area over the life of the plan. Public lands would be intensively managed for a wide variety of recreation opportunities and activities.

No surface occupancy and controlled surface use stipulations, and a lease closure would protect valuable recreation lands and resources within portions of the Planning Area from potential surface and other disturbance, and would enhance hunting activities for some species, including within all recommended ACECs. The recreation resources on the remainder of the Planning Area, including hunting quality, could be altered as a result of oil and gas development. The cumulative impacts, on a Planning area-wide basis, would not be significant unless the development and related activities occurred within close proximity to recreation areas or other highly valued areas.

Locatable mineral activity and above-ground rights-of-way development would result in deterioration of recreation settings if these lands are developed and a loss of actual recreation opportunities on the affected lands. About 9,923 fewer acres would be open to OHV use, 5,415 more acres would be closed, 279 fewer acres would have OHV use limited seasonally, and 4,787 more acres would have OHV use limited to designated routes yearlong. The changes in OHV designations would result in fewer acres being accessible to OHV users. Opportunities for solitude would increase on these affected lands, however.

ENVIRONMENTAL CONSEQUENCES

IMPACTS ON OUTSTANDINGLY REMARKABLE SCENIC VALUES IN SEGMENT A, LAKE FORK OF THE GUNNISON RIVER WILD AND SCENIC RIVER STUDY CORRIDOR

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from the Recommendation. In this alternative, the 13.3 mile-long Segment A of the Lake Fork of the Gunnison River from Sloan Lake to Wager Gulch would not be recommended as being suitable for inclusion into the National Wild and Scenic Rivers System (NWSRS). Potential impacts to the outstandingly remarkable scenic values (values) that qualify this segment to be eligible for inclusion are discussed below.

Impacts from Locatable Minerals Management. If mineral activity occurs on about 2,075 acres not currently withdrawn or proposed to be withdrawn within the segment in this alternative, values would be altered. The alteration would occur on lands located outside the existing "Loop Road" withdrawal C-0125423 or the proposed American Basin ACEC (proposed to also be withdrawn). Impacts would be greatest if vegetation removal or land form changes occur. The lands that would not be withdrawn have a high potential for the occurrence of locatable minerals. Required reclamation would limit impacts to the short-term.

Impacts from Recreation Management. Increased recreation visitation of about 40% over the life of the plan would result in some slightly greater impacts to scenic values along the road and river, primarily as a result of physical impacts caused by increased numbers of people and motorized vehicular use off designated routes, and the actual increase in the presence of vehicles and people. Scenic impacts from OHV use off designated routes would be mitigated by implementing patrols and other actions in the management plan for the Alpine Triangle Special Recreation Management Area (SRMA). Special management attention as a result of the proposed American Basin ACEC designation (Management Unit 4) would provide a means of enhancing or protecting the values on these lands, and

withdrawing federal mineral estate from mineral entry and location in the proposed ACEC to protect recreation and visual resources would also protect values on 1,577 acres in the segment (Unit 4).

Impacts from Visual Resources Management. Managing values in the proposed 1,597 acre American Basin ACEC under VRM Class I objectives would require that surface-disturbing activities appear natural upon completion. Managing livestock grazing in the proposed ACEC to enhance visual resources would in turn enhance the values on the affected lands.

Impacts from Wilderness Study Area Management. Impacts in this alternative are analyzed assuming that WSA status would not be in effect, in the event that Congress acts on, and decides not to designate any part of any WSA as wilderness. If any part of Segment A is designated as wilderness, those lands would be managed as wilderness. Refer to **Impacts of WSA Management** in the discussion of impacts of Alternative A (Continuation of Current Management) for impacts to values from WSA management that would be applicable to all alternatives, as long as WSA status applies.

Impacts from Rights-of-Way Management. Managing the lands within the segment as rights-of-way avoidance area would result in few surface-disturbing activities from this land use. Rights-of-way are now excluded in the "Loop Road" withdrawal.

Impacts from Withdrawals and Classifications. Continuing the BLM protective withdrawal C-0125423, and effecting the withdrawal in the proposed American Basin ACEC would preclude most surface disturbing activities within Segment A on 1,907 of the 4,315 acres of public land.

CUMULATIVE IMPACTS ON VALUES IN SEGMENT A

Increased recreation use, primarily off-highway vehicle use, could result in some increase of impacts to scenic values. Impacts from other activities would be offset by required compliance with BLM's surface management regulations, required plans of operation in the proposed American Basin ACEC, special ACEC

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management attention, rights-of-way exclusion and avoidance areas, VRM Class I objectives in the ACEC, and management actions in the plan for the Alpine Triangle SRMA.

IMPACTS ON VISUAL RESOURCES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Visual Resource Management. Managing 49,872 acres in the Powderhorn Primitive Area SRMA, and the American Basin and Dillon Pinnacles ACECs under VRM Class I objectives, 9,313 acres at High Mesa and in fishery riparian zones (unit 15) under VRM Class II objectives, and 6,000 acres at the Hartman Rocks area in units 8 and 13 under VRM class III objectives would require more mitigation for scenic quality on these lands, thereby protecting visual resources.

Impacts from Locatable Minerals Management. Surface disturbance from locatable mineral activity would alter landscapes where development occurs, but reclamation required would potentially result in a minimum of alteration, especially on 48,054 acres of federal mineral estate in the Redcloud Peak, West Antelope Creek, and South Beaver Creek proposed ACECs where prior submission of plans of operation would be required. Precluding mineral development on about 54,027 acres that are withdrawn from mineral entry and location under the general mining laws would fully protect visual resources from mining-related surface disturbance on these lands (these lands are in the Powderhorn Primitive Area and Cochetopa Canyon SRMAs, the proposed American Basin, Slumgullion, and Dillon Pinnacles ACECs, and other smaller miscellaneous withdrawals).

Impacts From Oil, Gas, and Geothermal Management. Not leasing lands in a primitive area, and restricting leases with controlled surface use and no surface occupancy stipulations within five ACECs, would protect high quality visual resources on 133,166 acres of public land. Drill pad, road, or utility construction, related to one or two wells, where they would potentially occur on the remainder of the Planning Area, could alter landscape characteristics, reduce scenic quality, and could potentially result in site-specific, long-term significant visual impacts that exceed allowable visual contrast, on a variety of

landscape types in the Planning Area. These impacts would be more difficult to mitigate and would potentially be greatest if development occurred within lands with VRM Class I or II management objectives, especially on those lands in foreground or middleground views south and west of Lake City.

Impacts from Rights-of-Way Management. Designating 51,406 acres as rights-of-way exclusion areas and 85,387 acres as avoidance areas would result in little or no changes being permitted to occur to scenic quality from this land use on these lands. Excluding rights-of-way on 51,406 acres and not authorizing above-ground utilities on an additional 95,624 acres would prevent the development of visual intrusions on these lands. Rights-of-way development occurring on 448,219 acres open to this land use would result in alterations to the landscape. Managing these changes according to VRM objectives would help keep them within acceptable limits.

Impacts from Rights-of-Way Corridors. Locating new, major above-ground and some underground facilities in two designated corridors would result in long term alterations to landscapes; these changes would be most adverse along the lower Lake Fork of the Gunnison River.

CUMULATIVE IMPACTS ON VISUAL RESOURCE MANAGEMENT

Managing about 6,300 additional acres under more restrictive VRM Class objectives would result in more mitigation for scenic quality on these lands. Managing the remainder of lands under VRM II, VRM III, or VRM IV class objectives would maintain scenic quality on these lands, but would permit projects or development that result in landscape contrast or change in localized view sheds. These changes would be most adverse where mining or major rights-of-way are located. Surface disturbances restrictions, including those regarding potential oil and gas activities, would protect high quality scenic values in portions of the Planning Area from a variety of land uses that could impact visual resources. Cumulative impacts to visual resources from one or two oil and gas wells would not be significant on a Planning Area-wide basis, unless the development were to occur in foreground or middleground landscapes with high quality scenery, usually defined as VRM class I or II lands.

ENVIRONMENTAL CONSEQUENCES

IMPACTS ON ARCHAEOLOGICAL AND HISTORICAL RESOURCES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Archaeological and Historical Resource Management. The gathering of archaeological or historical information required by law in response to project development or proposed disturbance would contribute to our current knowledge and data base. However, any physical disturbance and extraction of information from sites other than that for documentation, would remove that data from context, and destroy the integrity of sites.

CUMULATIVE IMPACTS ON ARCHAEOLOGICAL AND HISTORICAL RESOURCES

Existing policies, procedures, and regulations would provide for the protection, preservation and enhancement of recorded archaeological or historical sites from authorized projects. The effects from nature would not be mitigated and prevented, or corrective actions would not be implemented. Increased visitor use would result in an increase to vandalism, theft, and destruction of sites. Education and interpretation would reduce these impacts.

IMPACTS ON RIGHTS-OF-WAY

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Rights-of-Way and Corridor Management. Designation of east to west and north to south rights-of-way corridors would allow major utility applicants to plan for and design projects without the need to investigate and analyze alternative routes.

Designation of 51,406 acres as rights-of-way exclusion and 85,387 acres as avoidance areas, and an additional 95,624 acres as being open but restricted for utility construction (excluded for above-ground utilities), would result in additional costs to utility companies in planning, designing, and constructing facilities around these areas.

Seasonal restrictions on rights-of-way construction on 155,870 acres would potentially increase proponent's costs.

CUMULATIVE IMPACTS ON RIGHTS-OF-WAY

Designating 136,793 acres of public land as either rights-of-way exclusion or avoidance areas, and requirements of seasonal and other construction restrictions on 251,494 acres, including for above-ground utilities, would preclude development on some lands, and would potentially increase the cost of proposed construction on other lands. Designating two corridors would decrease the cost of planning for proposed projects in these areas, since analysis of alternative routes would not be required.

SHORT-TERM USES VS. LONG-TERM PRODUCTIVITY

Trade-offs between short-term uses and long-term productivity of resources have been identified. For this analysis, short-term refers to the period of implementation of this plan which is approximately 10 years, and long-term refers to at least a 20-year period or beyond during which the adverse or beneficial impacts of the proposal would still occur.

MINERAL RESOURCES

Locatable mineral development would be constrained by withdrawals, resulting in a long-term loss or delay in mineral production on affected lands.

SOIL AND WATER RESOURCES

Mineral development would potentially result in some increases in long-term erosion and sediment yields and possibly some degraded surface waters from mine discharge and spoil pile runoff. Some loss in soil productivity would be expected in areas where surface disturbing activities are proposed. Riparian zones proposed for intensive management from a variety of resource programs would experience improved soil and water resource conditions.

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RIPARIAN RESOURCES

Changes in livestock grazing forage utilization and other resource management would result in long-term improvement in riparian, hydrologic, and vegetation conditions.

WILDLIFE HABITAT

Big game, upland bird, and non-game habitat would be improved under this alternative. Pronghorn antelope, bighorn sheep, and sage grouse numbers would increase. Colorado Division of Wildlife long-term herd goals for elk and deer would be achieved. A marked improvement in fishery streams and increases in fish and other restrictions in riparian areas would be realized primarily due to the reduction of livestock utilization in riparian areas.

LIVESTOCK GRAZING

Restrictions on livestock grazing management, range treatments or improvements, total forage utilization on uplands and in riparian zones and elimination or reduction in livestock forage allocations would reduce authorized (active) grazing use, but would result in long-term forage productivity gains and improved ecological condition.

IRREVERSIBLE OR IRRETRIEVABLE COMMITMENTS OF RESOURCES

Irreversible or irretrievable commitments of resources occur when a wide range of future management options are precluded. This section identifies the extent to which the alternatives would irreversibly limit potential resource uses. The individual alternative impacts sections identify those decisions which apply to a particular alternative and the magnitude of the impact.

MINERAL RESOURCES

Once a particular area has been committed to a single, non-mineral use, it is not likely that the use would be reversed. Thus, mineral deposits within these areas would be irreversibly committed to not being developed and would be unavailable.

SOIL AND WATER RESOURCES

The loss of soil through wind and water erosion would be irretrievable.

VISUAL RESOURCES

Construction of permanent structures such as roads, buildings, and powerlines would result in an irretrievable loss of visual resources.

ARCHAEOLOGICAL AND HISTORICAL RESOURCES

The loss of archaeological or historical sites and information would be irretrievable.

DISPOSAL OF PUBLIC LANDS

Disposal of public lands would result in a loss of administrative control of all resource values on these lands except leasable and locatable minerals and existing land use authorizations.

COMPARISON OF IMPACTS

Table 5-1 lists the more significant impacts to the affected environment that would occur from implementing management actions under the PRMP and the five alternatives that were addressed in the DRMP.

Table 5-1

COMPARATIVE SUMMARY OF IMPACTS

RE-SOURCE/ RE-SOURCE SOURCE USE	IMPACTS OF EACH ALTERNATIVE					PROPOSED RESOURCE MANAGEMENT PLAN
	Alternative A (Continuation of Current Management Alternative)	Alternative B	Alternative C	Alternative D	Alternative E (Preferred Alternative)	
	OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.	OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.	OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, protecting, or enhancing the natural environment at a compatible and non-restricting level.	OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.	Same As Alternative E.
IMPACTS ON LOCATABLE MINERALS	Potential mineral exploration and development would be permitted on 683,285 acres, and would not be permitted on 45,282 acres of federal mineral estate.	Potential mineral exploration and development would be permitted on 670,198 acres, but not on 58,369 acres of federal mineral estate.	Potential mineral exploration and development would be permitted on 728,567 acres.	Potential mineral exploration and development would be permitted on 649,645 acres, and not permitted on 78,922 acres of federal mineral estate.	Potential mineral exploration and development would be permitted on 674,540 acres, and not permitted on 54,027 acres of federal mineral estate.	Potential mineral exploration and development would be permitted on 674,520 acres, and not permitted on 54,047 acres of federal mineral estate.
IMPACTS ON OIL, GAS, AND GEOTHER- MAL RESOURCES	No significant impacts would occur to the oil and gas program as a result of managing 288,640 acres open to leasing with seasonal stipulations, or 110,007 acres as closed to leasing, because of the low probability for the occurrence of oil and gas resources. Exploration and development would occur with few restrictions on 321,529 acres managed as open to leasing under standard leasing terms.	No significant impacts would occur to the oil and gas program as a result of managing 177,311 acres open to leasing with seasonal stipulations, 30,856 acres open to leasing with no surface occupancy stipulations, or 47,537 acres as closed to leasing, because of the low probability for the occurrence of oil and gas resources. Exploration and development would occur with few restrictions on 464,472 acres managed as open to leasing under standard leasing terms.	No significant impacts would occur to the oil and gas program as a result of managing 720,176 acres as open to leasing under standard leasing terms.	No significant impacts would occur to the oil and gas program as a result of managing 202,678 acres open to leasing with seasonal stipulations, 114,430 acres open to leasing with no surface occupancy stipulations, or 52,754 acres as closed to leasing, because of the low probability for the occurrence of oil and gas resources. Exploration and development would occur with few restrictions on 350,314 acres managed as open to leasing under standard leasing terms.	No significant impacts would occur to the oil and gas program as a result of managing 47,545 acres open to leasing with seasonal stipulations, 35,605 acres open to leasing with no surface occupancy stipulations, 2,417 acres open to leasing with a controlled surface use stipulation, or 46,007 acres as closed to leasing, because of the low probability for the occurrence of oil and gas resources. Exploration and development would occur with few restrictions on 588,602 acres managed as open to leasing under standard leasing terms.	No significant impacts would occur to the oil and gas program as a result of managing 11,823 acres open to leasing with seasonal stipulations, 26,205 acres open to leasing with no surface occupancy stipulations, 13,166 acres open to leasing with a controlled surface use stipulation, or 46,007 acres as closed to leasing, because of the low probability for the occurrence of oil and gas resources. Exploration and development would occur with few restrictions on 623,416 acres managed as open to leasing under standard leasing terms.

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Table 5-1 (Cont'd)

COMPARATIVE SUMMARY OF IMPACTS

IMPACTS OF EACH ALTERNATIVE

RE-SOURCE/ RE-SOURCE USE	Alternative A (Continuation of Current Management Alternative)	Alternative B	Alternative C	Alternative D	Alternative E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
	OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.	OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.	OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, protecting, or enhancing the natural environment at a compatible and non-restricting level.	OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.	Same As Alternative E.

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IMPACTS ON SOIL AND WATER RE- SOURCES	Hydrologic functions of riparian areas, and water quality and stream channel stability would be expected to steadily improve in the Long Gulch Demonstration Area, and at an unknown rate within some other riparian areas.	Same as in Alternative A, and sediment and erosion rates would be expected to decrease additionally as a result of implementing soil and water improvement projects on 55,555 acres of wildlife habitat and T&E species habitat, and IGMCs on riparian zones and uplands.	Same as in Alternative A, and sediment and erosion rates would be expected to decrease additionally as a result of implementing IGMCs on uplands and riparian areas, and allocating forage from wildlife habitat treatments in units C-4 and C-12 to watershed needs.	Same as in Alternative B, and sediment and erosion rates would be expected to decrease even more as a result of implementing more restrictive IGMCs and requiring mitigation in activity plans for site-specific surface disturbance.	Same as in Alternative B, except managing for less constraining minimum stubble heights in riparian areas could result in slightly more sedimentation and some increase in erosion rates.	Same as Alternative B, except managing for less constraining minimum stubble heights in riparian areas could result in slightly more sedimentation and some increase in erosion rates.
	Future water quantity protection would be provided where minimum stream flows would be acquired.	Future water quantity protection would be provided where appropriate on 113 miles of streams.				
	Sediment and erosion rates would be expected to decrease where surface disturbing activities are reduced, where basal vegetation cover is improved, and where livestock grazing utilization in some riparian zones is adjusted to achieve lower forage use rates. Sediment and erosion rates would slightly increase on the remainder of the planning area.					

<p>IMPACTS ON RIPARIAN ZONES</p>	<p>Mineral withdrawals, setting limits on livestock grazing, and commercial timber harvesting restrictions and requiring mitigation in other activity plans would combine to stabilize or improve the condition of some of the riparian areas within the planning area.</p>	<p>Mineral withdrawals, IGMCs, elimination of grazing in some areas, and restriction on commercial timber harvests would combine to markedly improve most of the 14,933 acres of riparian areas within the planning area.</p>	<p>There would be general stabilization and improvement in the condition of riparian zones associated with livestock grazing. This improvement would result from implementing total forage utilization limits in riparian zones, and from projects in high-priority riparian areas and from a variety of treatments (wildlife), and potentially from improving riparian conditions in units C-9, C-10, and C-11 (1,839 acres).</p>	<p>There would be a rapid improvement in the condition of riparian zones in the Planning Area as a result of implementing IGMCs (total forage utilization rates and maintaining minimum stubble heights), and there would be an increase in total production and diversity of plant species.</p>	<p>Same as Alternative B, and vegetation treatments, soil erosion reduction strategies, intensive riparian management, forage utilization limits, and fall trailing limits would help improve riparian conditions in the Planning Area.</p>	<p>Same as Alternative B, and vegetation treatments, soil erosion reduction strategies, intensive riparian management, forage utilization limits, and fall trailing limits would help improve riparian conditions in the Planning Area.</p>
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<p>IMPACTS ON SPECIAL STATUS PLANT & ANIMAL SPECIES AND HABITAT</p>	<p>The quality and quantity of T&E species and habitat would be maintained throughout the planning area.</p>	<p>Special management attention resulting from the designation of an RNA/ACEC and an ACEC limiting OHV use, and eliminating domestic sheep grazing in known habitat for T&E species would increase the information base and would prevent accidental destruction of plants, animals, and habitat, specifically skiff milkvetch and snowwillow.</p>	<p>Same as Alternative A. Accidental destruction of habitat would be more apt to occur due to more intensive management of "production" resources.</p>	<p>Special management attention resulting from two RNA/ACEC designations, limiting OHV use, and restrictions on livestock grazing, public land disposal, and timber harvests would protect and enhance habitat for T&E species and would prevent accidental destruction of these species and their habitat.</p>	<p>Same as Alternative B except two ACECs would be designated and managed for T&E species and habitat protection.</p>	<p>Same as Alternative B except two ACECs would be designated and managed for T&E species and habitat protection.</p>
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<p>IMPACTS ON TERRESTRIAL WILDLIFE AND HABITAT</p>	<p>Wildlife habitat conditions, including for big game, would gradually improve through land or vegetation treatments and other actions.</p>	<p>Wildlife habitat conditions would greatly improve, especially on big game crucial winter range, elk calving areas and bighorn sheep lambing areas as a result of improved distribution, special management attention in ACECs, seasonal stipulations and OHV designations limiting disruption and disturbance. Managing big game herds below current levels in some GMUs would increase forage and help meet CDOW long-range elk and deer herd goals.</p>	<p>A loss of habitat for elk, deer, sage grouse, and non-game species would occur as a result of potential mineral development, vegetation or land treatment projects, public land disposal, and OHV use.</p>	<p>Wildlife habitat conditions would improve as in Alternative B, but not to the same degree.</p>	<p>Wildlife habitat conditions would improve as in Alternative B, but not to the same degree. Bighorn sheep numbers would not increase as much as in Alternative B (250 vs. 500).</p>	<p>Wildlife habitat conditions would improve as in Alternative B, but not to the same degree. Bighorn sheep numbers would not increase as much as in Alternative B (250 vs. 500).</p>
	<p>Bighorn sheep herds would continue to fluctuate widely due to disease.</p>		<p>Bighorn sheep populations could be drastically reduced if disease transfer occurs between domestic and bighorn sheep.</p>	<p>Bighorn sheep and pronghorn antelope numbers would be managed at carrying capacity levels.</p>	<p>Sage grouse habitat would be enhanced and numbers of harvestable birds would increase through forage utilization limits, riparian zone management, seasonal restrictions, and other protective measures within leks and wintering areas.</p>	<p>Sage grouse habitat would be enhanced and numbers of harvestable birds would increase through forage utilization limits, riparian zone management, seasonal restrictions, and other protective measures within leks and wintering areas.</p>
	<p>Sage grouse habitat would potentially be destroyed or damaged and populations would be reduced if land or vegetation treatment projects in MFPs are implemented throughout planning area.</p>			<p>Sage grouse habitat would improve and numbers of grouse would increase as in Alternative B.</p>		

COMPARATIVE SUMMARY OF IMPACTS

IMPACTS OF EACH ALTERNATIVE

RE-SOURCE/ RE-SOURCE USE	Alternative A (Continuation of Current Management Alternative)	Alternative B	Alternative C	Alternative D	Alternative E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
	OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.	OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.	OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, protecting, or enhancing the natural environment at a compatible and non-restricting level.	OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.	Same As Alternative E.

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IMPACTS
ON
TERRESTRIAL
WILDLIFE
AND
HABITAT
(Cont'd)

Bighorn sheep numbers would be expected to increase.

Sage grouse habitat would be enhanced and numbers of harvestable birds would increase through seasonal restrictions and other protective measures within leks and wintering areas.

Habitat for non-game species would be increased through riparian zone improvements and increased habitat diversity.

Designation and management of West Antelope ACEC (29,060 acres) and East Gunnison ACEC (37,503 acres) would, through implementation of special management attention, help to achieve improved big game habitat and riparian zone conditions.

Designation and management of Bighorn-A (3,912 acres), Bighorn-B (4,762 acres), Cebolla Creek (9,812 acres), and Lake Fork (4,800 acres) ACECs would result in an increase in bighorn sheep herd sizes and a marked decrease in disturbances to bighorn sheep and disease transfer, and less disturbance to elk and deer. Cooperative livestock or other management on adjacent Forest Service lands would also help prevent the transfer of disease to bighorn sheep.

Habitat for non-game species would be increased through riparian zone improvements and increased habitat diversity. Designation and management of West Antelope ACEC (28,215 acres) would, through implementation of special management attention, help to achieve improved big game habitat and riparian zone conditions.

Habitat for non-game species would be increased through riparian zone improvements and increased habitat diversity. Designation and management of West Antelope ACEC (28,275 acres) would, through implementation of special management attention, help to achieve improved big game habitat and riparian zone conditions.

IMPACTS ON FISHERY RESOURCES (AQUATIC HABITAT)	Fishery/aquatic habitat streambank cover water temperature, sedimentation rates, and streambank instability would improve gradually in some areas as forage utilization management is adjusted.	Fishery/aquatic habitat would be enhanced within the majority of streams due to surface disturbance stipulations, implementing IGMCs, and riparian zone improvements.	Impacts would be similar to those in Alternative A, except more loss would probably occur as a result of more surface disturbance occurring from production-oriented resource management and OHV use.	The same or similar enhancement of fishery/aquatic habitat would occur, as that in Alternative B, except the majority of fishery streams would experience a more rapid improvement and stabilization in condition due to more restrictive IGMCs and riparian and upland surface disturbance restrictions.	Fishery/aquatic habitat would be intensively managed along approximately 58 miles of public land in unit E-15, resulting in habitat improvements, stabilized streambanks and increased vegetation on streambanks, from livestock forage utilization management and riparian zone management.	Same as for Alternative E, except that Management Units would not be prefixed by E.
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IMPACTS ON LIVESTOCK GRAZING MANAGEMENT	Implementing actions to ensure livestock utilization levels in the less-than-heavy range in some riparian zones could result in changes in seasons of use, kinds of livestock, and possible temporary reductions in livestock forage allocations. Any adjustments made would be considered during AMP revision or new CRMAP or AMP development, and could remain the same or be modified. Approximately 172 AUMs would be eliminated as a result of disposing of about 2,585 acres of public land currently being grazed. Current active preference would remain at 47,256 AUMs, unless decreases occur as a result of land disposal.	Elimination of livestock grazing, disposal of public land, implementing IGMCs, restricting kinds of livestock and altering turn-out dates would result in a net decrease of 5,480 AUMs in the planning area, resulting in a total active grazing preference of 41,948 AUMs.	Increases in livestock AUMs through allocation of additional areas, and implementation of vegetation or land treatments or projects designed to increase and improve vegetation production, would be partially offset by eliminating livestock grazing on several areas and the disposal of public land. The affect would be an increase of 4,256 AUMs being available resulting in a total of 51,684 active AUMs of forage being available for allocation.	The elimination of livestock grazing, restrictions on kinds of livestock and restrictions of total key forage utilization would severely restrict the livestock grazing program. There would be a total decrease of 12,406 AUMs of forage for livestock use, resulting in a total active grazing preference of 35,022 AUMs.	The elimination of livestock grazing, restrictions on kinds of livestock and total key forage utilization in riparian zones and on uplands would result in a decrease of 902 AUMs of forage for livestock use, resulting in a total active grazing preference of 46,526 AUMs.	The elimination of livestock grazing, restrictions on kinds of livestock and total key forage utilization in riparian zones and on uplands would result in a decrease of 524 AUMs of forage for livestock use, resulting in a total active grazing preference of 46,904 AUMs.
				Implementing actions to ensure livestock utilization levels in the less-than-heavy range in some riparian zones could result in additional changes in seasons of uses, kinds of livestock, and possible temporary reductions in livestock forage allocations.	Implementing actions to ensure livestock utilization levels in the less-than-heavy range in some riparian zones could result in additional changes in seasons of uses, kinds of livestock, and possible temporary reductions in livestock forage allocations.	

IMPACTS ON FOREST MANAGEMENT	Management restrictions in riparian zones, WSAs, and disposal of public land would eliminate sustained yield production on approximately 15,050 acres of suitable commercial forest lands (SCFL), reducing annual potential harvest by about 451 MBF. About 44,062 acres of SCFL and 19,262 acres of suitable woodlands would be available for production, resulting in a potential annual harvest of 1,200 MBF of commercial timber, 400 cords of firewood, 400 wildings, and, on average, 300 Christmas tree.	Harvesting or other management-related restrictions in riparian zones, wildlife habitats, VRM Class II areas, and public land disposal would eliminate sustained yield production on approximately 19,670 acres of suitable commercial forest lands (SCFL), resulting in a potential annual harvest loss of 590 MBF of commercial timber. About 39,442 acres of SCFL and 24,405 acres of suitable woodlands would be available for production, resulting in a potential annual harvest of 1,180 MBF of commercial timber, a de-	Disposal of public land would result in a loss of 153 acres of suitable commercial forest lands, and an annual potential loss of 3 MBF of commercial timber. Approximately 58,959 acres of suitable commercial forest lands (SCFL) would be available for production, resulting in a potential annual harvest of approximately 1,770 MBF, an increase of 570 MBF over Alternative A. The same number of other products and acres of suitable woodland outputs as in Alternative A would be available for harvest annually.	Harvesting or other management-related restrictions in riparian zones, wildlife habitat, VRM Class II areas, and public lands disposal would eliminate sustained yield production on approximately 24,433 acres of suitable commercial forest land, resulting in a potential annual harvest loss of approximately 733 MBF. About 34,679 acres of suitable commercial forest lands would be available for production, resulting in a potential annual harvest of about 1,040 MBF of commercial timber, a	Harvesting or other management-related restrictions in riparian zones, wildlife habitat, VRM Class II areas, SRMAs, ACECs, public lands disposal and possibly fire management would eliminate sustained yield production on approximately 17,765 acres of suitable commercial forest land, resulting in a potential annual harvest loss of approximately 535 MBF. About 41,347 acres of suitable commercial forest lands would be available for production, resulting in a potential annual harvest of 1,200 MBF of commercial timber. No significant change	Same as Alternative E.
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Table 5-1 (Cont'd)

COMPARATIVE SUMMARY OF IMPACTS

IMPACTS OF EACH ALTERNATIVE

RE-SOURCE/ RE-SOURCE USE	Alternative A (Continuation of Current Management Alternative)	Alternative B	Alternative C	Alternative D	Alternative E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.	OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.	OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, protecting, or enhancing the natural environment at a compatible and non-restricting level.	OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.	Same As Alternative E.	

5-28
IMPACTS
ON FOREST
MANAGEMENT
(Cont'd)

crease of 20 MBF of commercial timber compared to Alternative A; about 105 additional cords of firewood, for a total of 505 cords, would be available annually for harvest, along with the same number of other outputs as in Alternative A.

decrease of 160 MBF would occur compared to Alternative A. Alternative A. About 90 About 27,532 acres of additional cords of firewood suitable woodlands being would be produced annually on available annually would 23,615 acres of suitable result in an annual harvest of woodlands, for a total of 490 565 cords of firewood, an cords annually, along with the increase of 165 cords same number of other outputs and products as in Alternative number of other outputs and A. products as in Alternative A.

IMPACTS
ON
RECREATION
MANAGEMENT

Implementing recreation management actions in RAMPs for the Cochetopa and San Juan Triangle SRMAs would help provide for an estimated 30% gradual increase in visitor use and available facilities, and somewhat more protection of recreation resources. Managing the Powderhorn SRMA for primitive recreation opportunities would continue to provide backcountry opportunities and experiences for visitors.

Fully implementing recreation management actions in RAMPs for Cochetopa and San Juan SRMAs would help provide for an estimated 50% increase in visitor use as a result of additional facilities, and a greater degree of utilization of recreation resources would occur. Designating Powderhorn ACEC (48,033 acres), Alpine ACEC (88,663 acres), and Lake Fork ACEC (4,685

Environmental effects under Alternative C would be similar to Alternative A, except that adverse impacts to recreation impacts would be much greater in scope. A decrease in visitation would occur. Not managing resources in the Powderhorn SRMA for Primitive, restrictive ROS settings would result in uses occurring that have not been permitted since designation as a Primitive Area, such as motorized vehicular travel, un-restricted

Impacts would be similar as in Alternative A. Visitation increases would be about the same as in Alternative A. Management for natural values would constrain recreation facility development be requiring more mitigation and seasonal or geographic restrictions. Recreation settings would be enhanced and improved overall.

Implementing recreation management actions in activity plans for the Cochetopa Canyon, Alpine Triangle, and Powderhorn Primitive Area SRMAs would help provide for an estimated increase of 40% in visitation, as a result of improved and additional facilities; more protection of recreation settings would occur from livestock grazing restrictions than in either alternative.

Same as Alternative E.

IMPACTS ON RECREATION MANAGEMENT (Cont'd)

Managing the remainder of the planning area as the Gunnison ERMA would result in a slight increase in dispersed, low-scale developments, and would provide a diversity of experiences and settings.

Management of recreation and other resources in this alternative, including soils and water, wildlife habitat, visual resources, WSAs, historic resources, transportation and access, and some aspects of the realty and fire programs would result in overall improvements or maintenance of ROS Settings and resources.

Acres and locations in each OHV designation (373,916 acres open, 92,937 acres limited yearlong; 74,707 acres limited seasonally; and 43,462 acres closed) would essentially remain the same as currently designated with some minor adjustments or changes being made.

Managing the remainder of the Planning Area as the Gunnison ERMA would result in a moderate increase in dispersed, low-scale developments, and would enhance and provide a greater diversity of experiences and settings.

Management under this alternative would result in approximately a 50% increase in visitation over the life of the plan.

About 5,171 more acres would be closed to OHV use, and "open" acres would decrease by about 5,171 acres.

livestock grazing improvement maintenance, and potential mineral activity. Recreation settings would be altered, and the quality of primitive, non-motorized recreation experiences, and opportunities, in the area would be greatly lowered or eliminated. Motorized travel in the area would increase.

Overall, this alternative would result in serious decreases in recreation activities, settings, and experiences, as a result of reductions in scenic quality, displaced wildlife, and reduced fishery habitat and production.

This alternative would result in a decrease of 42,862 acres closed to OHV use, an increase of 135,789 acres open to OHV use, and the elimination of 92,927 acres where OHV use is limited to designated routes yearlong.

Designation and management of the Lake Fork ACEC (4,800 acres) and the Slumgullion Slide ACEC (1,370 acres) would result in special management attention being implemented to protect, and enhance management and interpretation of values in these units.

Less land would be designated open to OHV use (-54,620 acres), more lands would be closed to OHV use (+14,389 acres), and more lands would be limited in some manner (+5,288 acres seasonally and +34,943 acres to designated routes year-long).

Designation of American Basin (1,595 acres) Slumgullion Earthflow National Natural Landmark (1,140 acres), and Dillon Pinnacles (532 acres) ACECs would result in special management attention and enhancement for these resources.

About 5,415 more acres would be closed to OHV use, and open areas would decrease by 9,923 acres; OHV use would be limited to designated routes yearlong on 4,787 more acres and limited seasonally on 279 fewer acres.

5-29

IMPACTS ON OUTSTANDINGLY REMARKABLE SCENIC VALUES IN SEGMENT A, LAKE FORK OF THE GUNNISON RIVER WILD AND SCENIC RIVER STUDY CORRIDOR

Scenic values could be impacted from OHV traffic and numbers of people as a result of an anticipated increase in recreation visitation of 30% in the planning area over the life of the plan. Locatable mineral activity occurring on 352 acres of federal mineral estate not withdrawn or not in WSAs could result in short term alterations to scenic values. BLM's surface management regulations would require reasonable reclamation of these activities. No designation of the segment into the wild and scenic rivers system would occur.

Scenic values could be impacted from OHV traffic and numbers of people as a result of an estimated 20% increase in recreation visitors in the planning area over Alternative A. Locatable mineral activity occurring on 2,075 acres not withdrawn in the segment could result in short-term alterations to scenic values, but required plans of operation from ACEC designation would permit more design time for reasonable reclamation. Designation of the segment into the wild and scenic rivers system could result in more motorized vehicle traffic, and thus more impacts to scenic values.

Scenic values in the segment could be altered as a result of no federal mineral estate being withdrawn. The BLM's surface management regulations, and other mitigation for discretionary actions, would limit most of these impacts to the short term, and reasonable reclamation would be required of mining activities. No designation of the segment into the wild and scenic rivers system would occur.

Same as for Alternative B, except that no additional increase in recreation visitation is anticipated over that in Alternative A, other than that from the increased recognition that would occur if designated, and only 1,577 acres in the segment would be within an ACEC. The ACEC would be managed under VRM Class I objectives that would require future activities to be near-natural in appearance. Designation of the segment into the wild and scenic rivers system could result in more motorized vehicle traffic, and thus more impacts to scenic values.

Same as for Alternative D, except a 10% increase in recreation visitation, over that in Alternative A is anticipated, and no designation of the segment into the wild and scenic rivers system would occur, and thus no increase in motorized vehicle use would occur from additional recognition.

Same as for Alternative D, except a 10% increase in recreation visitation, over that in Alternative A is anticipated, and no designation of the segment into the wild and scenic rivers system would occur, and thus no increase in motorized vehicle use would occur from additional recognition.

COMPARATIVE SUMMARY OF IMPACTS

IMPACTS OF EACH ALTERNATIVE

RE-SOURCE/ RE-SOURCE USE	Alternative A (Continuation of Current Management Alternative)	Alternative B	Alternative C	Alternative D	Alternative E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.	OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.	OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, protecting, or enhancing the natural environment at a compatible and non-restricting level.	OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.	OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.	Same As Alternative E.	

IMPACTS
ON VISUAL
RESOURCES

Managing the public lands according to existing VRM Class objectives (VRM Class I, 43,590 acres, VRM Class II, 174,510 acres, VRM Class III, 126,645 acres, VRM Class IV, 236,845 acres, and VRM Class IIR, IIIR, and IVR, 4,422 acres) would maintain the overall visual character of the planning area, but would allow for significant visually contrasting projects within localized viewsheds on VRM Class III and IV lands.

The scenic quality would be maintained or potentially improved on public lands due to the change from Alternative A in VRM Class objectives on VRM I lands (+4,443 acres), VRM II lands (-2,943 acres), VRM III lands (+5,915 acres), and VRM IV lands (-7,235 acres), and VRM IIR, IIIR, and IVR lands (-180 acres).

Designation and management of Powderhorn (48,033 acres), Alpine (88,663 acres), and Lake Fork (4,685 acres) ACECs would result in more mitigation and enhancement of visual quality as a result of special management attention.

The combined affect of management actions identified in this alternative would potentially result in a severe reduction of visual quality throughout the planning area as a result of changes from Alternative A in VRM Class objectives on public land on VRM Class I lands (-35,750 acres), VRM Class II lands (-37,877 acres), VRM Class III lands (-115,834 acres), and VRM Class IV lands (+291,464 acres), and VRM IIR, IIIR, and IVR (-4,247 acres).

Approximately 53% or 311,598 acres of the planning area would be managed under VRM Class II objectives. This action would require more mitigation of impacts to scenic quality and enhance the overall visual quality.

Impacts would be similar to those in Alternative B, as a result of the following changes from Alternative A in VRM Classes: VRM I (+4,314 acres), VRM II (+138,088 acres), VRM III (+93,319 acres), VRM IV (-235,645 acres), and VRM IIR, IIIR, and IVR (-76 acres).

Designating and managing American Basin (1,577 acres), Lake Fork (4,800 acres) and Dillon Pinnacles (190 acres) ACECs, and implementing special management attention would result in more mitigation and protection, and enhancement

Impacts would be similar to those in Alternative B. The scenic quality would be maintained or potentially improved on public lands due to the change from Alternative A in VRM Class objectives on VRM I lands +6,282 acres), VRM II lands (-3,896 acres), VRM III lands (+9,093 acres), VRM IV lands (-11,069 acres), and VRM IIR, IIIR, and IVR (-410 acres). Designation and management of American Basin (1,595 acres) and Dillon Pinnacles (532 acres) ACECs would potentially result in more mitigation and enhancement of visual quality as a result of special management attention.

Impacts would be similar to those in Alternative B. The scenic quality would be maintained or potentially improved on public lands due to the change from Alternative A in VRM Class objectives on VRM I lands +6,282 acres), VRM II lands (-3,896 acres), VRM III lands (+9,093 acres), VRM IV lands (-11,069 acres), and VRM IIR, IIIR, and IVR (-410 acres). Designation and management of American Basin (1,595 acres) and Dillon Pinnacles (532 acres) ACECs would potentially result in more mitigation and enhancement of visual quality as a result of special management attention.

IMPACTS ON WILDERNESS STUDY AREAS	Rights-of-way locations would impair wilderness characteristics, in varying degrees, in WSAs if they occur.	Same as Alternative A.				
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Management of wildlife habitat, soils and water, riparian zones, visual resources, transportation and access, Realty/Lands, and Fire management programs, and BLM's IMP for WSAs would maintain wilderness characteristics.

Any lands designated as wilderness would be managed as such and a management plan would be prepared.

MANAGEMENT OF LANDS IN WSAs IN ALTERNATIVES B, C, D, & E, AND THE IMPACTS OF THESE ALTERNATIVES ON LANDS WITHIN EXISTING WSAs ARE ANALYZED AND PRESENTED IN THE EVENT CONGRESS ACTS UPON AND DOES NOT DESIGNATE PARTS OR ALL OF WSAs AS WILDERNESS. ACTIONS AND ASSOCIATED IMPACTS WOULD BE LIMITED TO THOSE THAT COULD OCCUR UNDER BLM's IMP FOR LANDS UNDER WILDERNESS REVIEW.

IMPACTS ON ARCHAEOLOGICAL RESOURCES

Existing policies, procedures, and regulations would provide for the protection, preservation and enhancement of archeological sites from authorized projects. Effects from other dispersed activities, and nature, are not subject to standard operating procedures, thus these effects would not be mitigated and preventative or corrective actions would not be implemented.

An increase in vandalism, theft, and destruction of archeological sites could occur due to increased visitor use.

Same as Alternative A, except designation and management of all ACECs and the RNA/ACEC would generally provide more protection for archaeological values that may be present.

Same as Alternative A, except that designation and management of all ACECs and RNA/ACECs would provide more protection for archaeological values that may be present.

Same as Alternative B, except no RNA/ACEC would be designated.

Same as Alternative B, except no RNA/ACEC would be designated.

IMPACTS ON HISTORICAL RESOURCES

Existing policies, procedures, and regulations would provide for the protection, preservation and enhancement of historical sites from authorized projects. Effects from other dispersed activities and nature are not subject to standard operating procedures; thus impacts would not be mitigated and preventative or corrective actions would not be implemented. Increased visitor use could result in some increase in vandalism, theft, and destruction of historical sites.

Same as Alternative A, and designation and management of Alpine and Lake Fork ACECs would result in historic sites being protected and intensively managed and interpreted.

Same as Alternative A. Increased visitor use could result in more of an increase in vandalism, theft, and destruction of historical sites.

Same as Alternative A, except that designation and management of Lake Fork ACEC would result in sites being managed for interpretation and special management attention.

Impacts would be similar to Alternative B, except designation of American Basin and Redcloud Peak ACECs could result in more protection of historic sites. Historic sites would receive management emphasis (interpretation, stabilization, necessary surveys, and protection) in Unit E-1 and the entire Alpine Triangle CRMAP.

Impacts would be similar to Alternative B, except designation of American Basin and Redcloud Peak ACECs could result in more protection of historic sites. Historic sites would receive management emphasis (interpretation, stabilization, necessary surveys, and protection) in Unit 1 and the entire Alpine Triangle CRMAP.

Increased visitor use could result in an increase in vandalism, theft, and destruction of historical sites.

Table 5-1 (Cont'd)

COMPARATIVE SUMMARY OF IMPACTS

IMPACTS OF EACH ALTERNATIVE

RE-SOURCE/ RE-SOURCE USE	Alternative A (Continuation of Current Management Alternative)	Alternative B	Alternative C	Alternative D	Alternative E (Preferred Alternative)	PROPOSED RESOURCE MANAGEMENT PLAN
<p>OBJECTIVES: Continue the present levels, methods, and mix of multiple use resource management, maintaining existing uses, outputs, and protection activities.</p>	<p>OBJECTIVES: To emphasize or be compatible with those resources which promote outdoor recreation opportunities, tourism, economic stability, and the quality of life.</p>	<p>OBJECTIVES: To emphasize a high degree of economic return and resource production, while maintaining, protecting, or enhancing the natural environment at a compatible and non-restricting level.</p>	<p>OBJECTIVES: To emphasize a high degree of protection, enhancement, and maintenance for natural values, while sustaining a compatible level of production for renewable and non-renewable resources.</p>	<p>OBJECTIVES: To emphasize the mix and variety of actions that best resolves the issues and management concerns of this RMP/EIS; to achieve a balance between competing demands on uses of public land.</p>	<p>Same As Alternative E.</p>	
<p>IMPACTS ON RIGHTS-OF- WAY CORRIDORS</p>	<p>All impairing rights-of-way development would be precluded from 114,247 acres of public land associated with WSAs within the planning area until such time as Congress makes a decision on designation of wilderness.</p>	<p>The designation of 54,024 acres of public land as rights-of-way exclusion and 161,283 acres as avoidance areas and the restriction of right-of-way construction on 134,970 acres seasonally would increase costs of these projects.</p> <p>The designation of an east-west rights-of-way corridor would decrease the cost of projects that would be authorized in the corridor.</p>	<p>The designation of 120 acres of public land as rights-of-way exclusion and 1,150 acres as avoidance areas and the restriction of rights-of-way construction on 8,322 acres seasonally would increase costs of these projects on these lands.</p> <p>The designation of four rights-of-way corridors would decrease the cost of projects that would be authorized in the corridors.</p>	<p>The designation of 63,863 acres of public land as rights-of-way exclusion and 129,144 acres as avoidance areas and restricting construction on 195,751 acres would increase development costs.</p>	<p>The designation of 51,406 acres of public land as rights-of-way exclusion and 85,387 acres as avoidance areas and the restriction of right-of-way construction on 155,870 acres seasonally would increase costs of these projects.</p> <p>The designation of east-west and north to south rights-of-way corridor would decrease the cost of projects that would be authorized in the corridor.</p>	<p>Same as Alternative E.</p>

CHAPTER SIX

DISTRIBUTION OF THE PRMP AND LIST OF PREPARERS

CHAPTER SIX DISTRIBUTION OF THE PRMP AND LIST OF PREPARERS

DISTRIBUTION OF THE PRMP AND FINAL EIS

This Proposed Resource Management Plan and Final Environmental Impact Statement (PRMP) will be distributed to approximately 700 addresses, including all addresses to which the Draft Gunnison Resource Management Plan and Environmental Impact Statement (DRMP) was sent. The original distribution list for the DRMP was expanded for this document to include those individuals, organizations, and agencies who made statements at the public hearings on the DRMP, submitted written comments, or requested copies of the DRMP. See Appendix P in this

document for a complete distribution list for this document.

LIST OF PREPARERS

The Draft Gunnison Resource Management/ Environmental Impact Statement (DRMP) was prepared by an interdisciplinary team of resource specialists from the Bureau of Land Management (BLM). The team consisted of 32 specialists from the Gunnison Resource Area Office (GRA), the Montrose District Office, (MDO), and the Colorado State Office (CSO).

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APPENDIXES

The Appendixes contained in the PRMP consist of those that were printed in the Gunnison Draft Resource Management Plan/Final Environmental Impact Statement (DRMP). The content of several Appendixes has been modified as a result of internal review or public comments received on the DRMP.

APPENDIXES

Appendix A:	Wildlife Management	A-1
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APPENDIX A WILDLIFE MANAGEMENT

Table A-1

CDOW LONG RANGE HERD GOALS

GMU	ELK ¹	DEER ¹
54	3,000	4,800
55/551	3,000	5,000
<u>66/67</u>	<u>3,000</u>	<u>6,800</u>
Totals	9,000	16,600

Note: ¹ Numbers represent the total projected animals present including Federal, State, and private lands.

Table A-3

LONG-RANGE DEER HERD GOALS ON PUBLIC LANDS WITHIN THE PLANNING AREA

GMU	NUMBERS OF DEER ¹
54	2,000
55	2,250
64 & 65	130
66	1,000
67	700
551 North	1,000
<u>551 South</u>	<u>1,750</u>
Totals	8,830

Note: ¹ Herd goal numbers would be managed to support deer numbers within proper utilization levels on public lands. Numbers are approximate.

Table A-2

LONG-RANGE ELK HERD GOALS ON PUBLIC LANDS WITHIN THE PLANNING AREA

GMU	NUMBERS OF ELK ¹
54	1,250
55	700
64 & 65	97
66	1,100
67	800
551 North	400
<u>551 South</u>	<u>400</u>
Totals	4,747

Note: ¹ Herd goal numbers would be managed to support elk numbers within proper utilization levels on public lands. Numbers are approximate.

Table A-4

ELK AND DEER INTERIM HERD GOALS ON PUBLIC LANDS WITHIN THE PLANNING AREA

GMU	ELK ¹	DEER ¹
54	1,150	1,400
55	700	1,575
64 & 65 ²	97	130
66	1,100	700
67	800	500
551 North	400	700
<u>551 South</u>	<u>400</u>	<u>1,225</u>
TOTALS	4,647	6,230

Note: ¹ Numbers represent recommended interim elk or deer herd goals for all BLM-managed lands in the Planning Area, until shrub production and vigor increases.

² A reduction in elk and deer numbers would be recommended to CDOW in GMU 64. The number is not known at the time this document was printed.

APPENDIXES

Table A-5

**PRMP MANAGEMENT UNIT NUMBERS
KEYED TO CDOW GAME MANAGEMENT UNIT NUMBERS IN THE PLANNING UNIT**

CDOW GMU NUMBER²	BLM DRMP MU NUMBER³
54	7 ³ , 9 ³ , 13, 16
55	12, 15, 16
64	12
65	1, 13, 15, 16
66	1, 2 ³ , 4 ³ , 5 ³ , 6 ³ , 10, 12, 13, 15, 16
67	3, 8 ³ , 10, 11, 12, 13, 14, 15, 16
551 North	12, 14, 16
551 South	3, 11, 12, 14, 15

Notes:

- ¹ CDOW GMU = Colorado Division of Wildlife Game Management Unit
- ² BLM PRMP MU = Bureau of Land Management Proposed Resource Management Plan Management Unit
- ³ These Management Units are entirely contained in the noted GMU.

GUIDELINES FOR SAGE GROUSE HABITAT MANAGEMENT

Manage for sagebrush conditions that maintain the following habitat components for sage grouse.

A. Management Guidelines Common to All Sage grouse Habitat Areas

1. Protect all strutting grounds, or leks, from destruction.
2. Allow no treatments that would remove more than 25% of the sagebrush within one-half mile of all leks.
3. Protect sagebrush taller than 15 inches on dry south facing slopes greater than or equal to

five percent and on ridge tops with slopes less than or equal to five percent.

4. Maintain sagebrush on public lands within 300 feet of irrigated hay meadows or pastures for escape cover.
5. In sagebrush stands having an average height of 10 to 15 inches, maintain a 10 to 15% overstory cover for summer habitat.
6. In order to protect brood-rearing cover and forage, maintain 50% of the sagebrush within a 600 foot buffer zone around wetlands, wet and sub-irrigated meadows, and riparian areas. Untreated areas will be representative of the total treatment area with the 600 feet prior to treatment.

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7. Maintain 50% of the tall dense sagebrush in drainage for winter habitat.

8. Manage for a canopy cover of 20-30% in sagebrush stands 15 to 20 inches high.

B. Management Guidelines in Sage Grouse High Production Areas

1. Sagebrush treatments would not remove more than 30% of the sagebrush within two miles of a lek in high production areas. This 30% should contain equal amounts of all types of canopy cover and height.

C. Management Guidelines Outside of Sage grouse High Production Areas but Within Sage Grouse Habitat Areas.

1. Sagebrush treatments would not remove more than 50% of the sagebrush within two miles of a lek. This 50% should contain equal amounts of all types of canopy cover and height.

NON-GAME MANAGEMENT IN TIMBER MANAGEMENT AREAS

Manage timber resources to improve or maintain habitat for timber dependent non-game wildlife.

Within all timber types, maintain a 200 acre block of undisturbed forest around all goshawk nests to meet nesting requirements.

Maintain two slash piles and five logs 20" or greater DBH per acre for small mammals, black bears, and pine martens.

Within proposed clearcuts, maintain two-to-five snag trees for each three-to-four acres of clearcut; minimum diameter of snag trees at breast height would be 18", with a minimum height of 20 feet; if snag trees are not available in areas to be clearcut, live trees meeting these criteria would be girdled,

Maintain 30% of the ponderosa pine for Abert squirrels as follows: uneven-aged; 11-36 inches DBH; 200 stems per acre with basal area of 150-200 square feet, canopy closure greater than 80% with interlocking branches; and crowns 30-50 feet above the floor. Furthermore, trees meeting the parameters should occur in contiguous stands 1 to 2 acres.

Maintain a variety of all ecosystem timber types and all five forest structural stages that would maintain viable populations of non-game wildlife as identified in the Managing Forest Lands for Wildlife handbook.

Increase the grass and forb component of sagebrush communities and maintain sage cover of 25%. A combination of good ground cover with sagebrush provides optimum habitat for small mammals and birds.

Table A-6

MITIGATION FOR BIRDS OF PREY HABITAT

SPECIES	HABITAT ¹ TYPE	TYPES OF SURFACE DISTURBANCE RESTRICTIONS ON PUBLIC LANDS WITHIN OR SURROUNDING NESTS, ROOSTS, OR HABITAT ²	
		PUBLIC LANDS WHERE NO SURFACE DISTURBANCE WOULD OCCUR YEARLONG	PUBLIC LANDS WHERE SEASONAL RESTRICTIONS FOR SURFACE DISTURBANCE WOULD APPLY
Ferruginous Hawk	Nesting	1/8 mile radius of nest	3/1-6/31, between 1/8 and 1/4 mile radius
Golden Eagle	Nesting	1/8 mile radius of nest	2/15-7-15, between 1/8 and 1/4 mile radius
Prairie Falcon	Nesting	1/8 mile radius of nest	3/15-7-31, between 1/8 and 1/4 mile radius
Peregrine Falcon	Nesting	1/8 mile radius of nest	3/15-7/31, between 1/8 and 1/4 mile radius
Bald Eagle	Nesting	1/8 mile radius of nest	11/15-7/31, between 1/8 and 1/2 mile radius
	Active/Inactive		
	Roost	1/8 mile radius of nest	11/15-3/15, between 1/8 and 1/2 mile radius
	Diurnal/Nocturnal		
	Crucial Winter	1/8 mile radius of nest	11/15-3/15, between 1/8 and 1/2 mile radius
Other Raptors	Nesting	1/8 mile radius of nest	2/15-7/15, between 1/8 and 1/4 mile radius

Notes: ¹
²

Diurnal and Nocturnal = daytime and nighttime, respectively.

If habitat is located within planned surface disturbance site(s), specific inventories would determine if habitat would be affected and appropriate mitigation determined at that time.

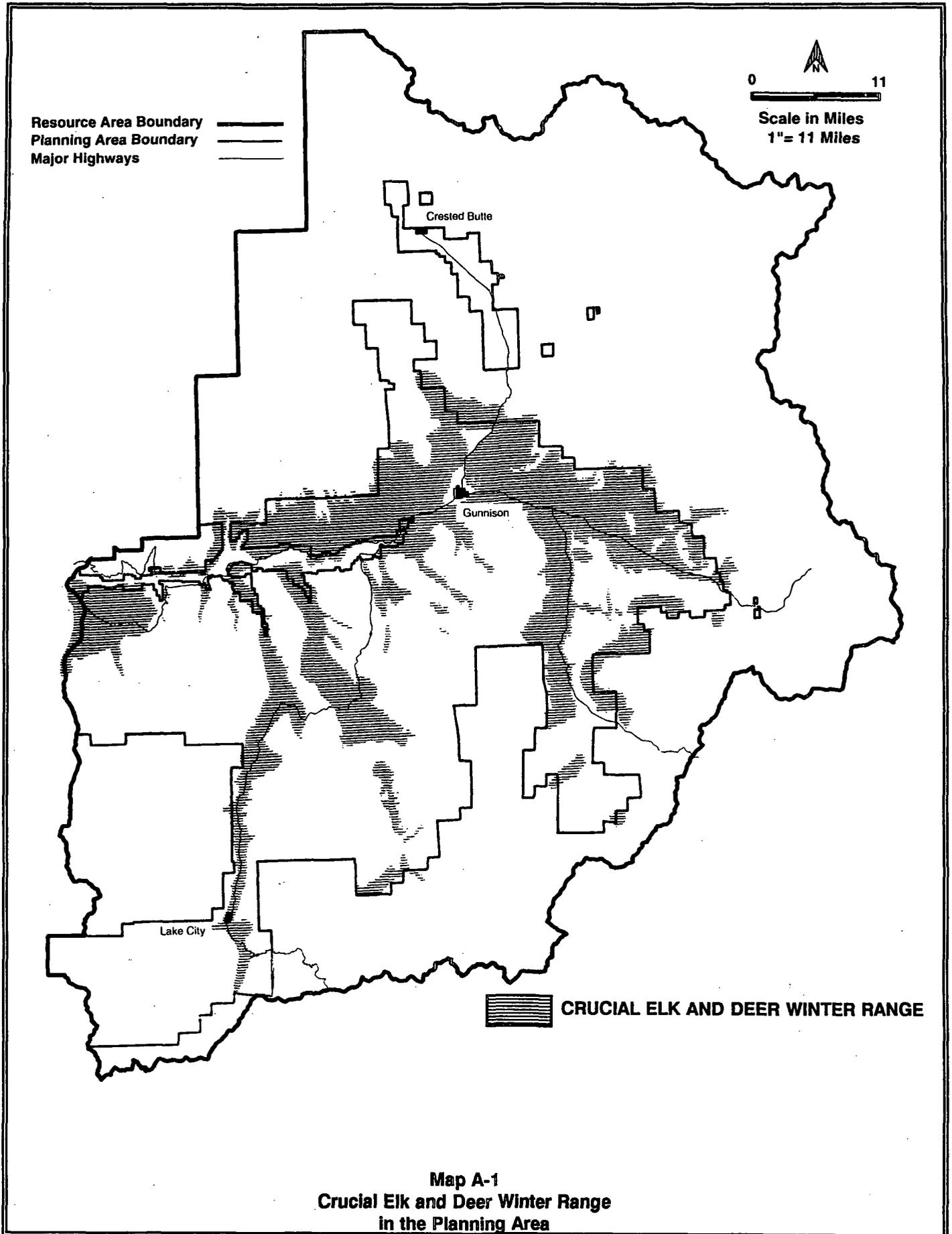
CHANGES IN THE KIND OF LIVESTOCK FOR BIGHORN SHEEP OR PRONGHORN ANTELOPE IN THE PRMP

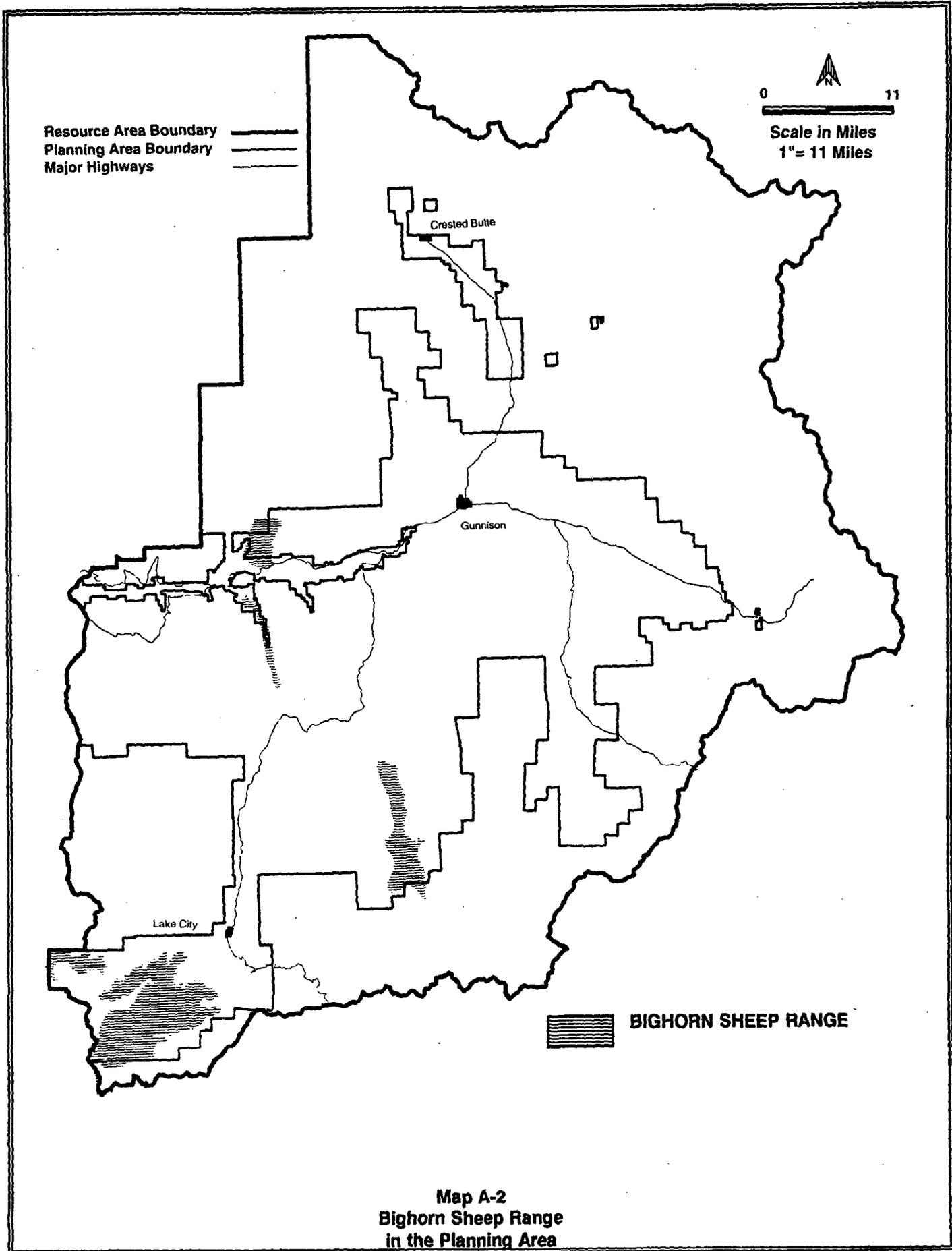
Several grazing allotments were approved for conversion of the kinds of livestock that would be authorized from cattle or sheep to cattle only in 1989, in order to enhance management of bighorn sheep or pronghorn antelope and their habitat. Several

allotments are proposed for the same type of change in the PRMP in order to enhance management of bighorn sheep and their habitat. These changes were incorporated into the Draft Gunnison Resource Management Plan and Environmental Impact Statement (DRMP), and are incorporated into the PRMP. Table A-6 below lists the allotments that would be subject to the changes.

Table A-7
ALLOTMENTS WHERE A CHANGE IN KIND OF LIVESTOCK WOULD OCCUR

<i>BIGHORN SHEEP</i>		<i>PRONGHORN ANTELOPE</i>
Allotments Approved For Conversion in 1989	Allotments Proposed For Conversion in The PRMP	Allotments Approved For Conversion in 1989
6312	6112	6312
6316	6180	6314
6317	6111	6319
6318	6108	
6328	6200	
6329	6109	
6338	6119	
	6114	





APPENDIX B

LIVESTOCK GRAZING MANAGEMENT

RANGE READINESS CRITERIA FOR THE GUNNISON BASIN RESOURCE AREA

Criteria for range readiness consists of two elements: (1) soil readiness and (2) vegetation readiness.

Soil Readiness. Soils are especially vulnerable to damage in early season because of high soil moisture. Grazing at this time can damage soils, causing loss in productivity. Livestock should be excluded from the allotment at this critical period to allow the soil to become firm and plants to complete their early growth. Where applicable, snow should be absent from stock driveways.

Indicators of Soil Readiness:

Soils should be firm before grazing starts and moisture content should be low enough to insure that:

1. Soils will not be compacted resulting in hardpan surfaces which are impervious. This is especially true on fine-textured soils.
2. Sod covers in meadows and riparian areas will not be broken by hoof action.
3. Seedlings will not be pulled out of the ground because of high soil moisture.

Vegetative Readiness. The development stages of the species in Table B-1 would be used as indicators of readiness for grazing. This list is by no means complete. Additional species and developmental stages could be included when appropriate. These growth stages represent the earliest dates that use can begin on. When an allotment is dominated by a poor range condition, the guidelines prescribed in Table B-1 may have to be further altered to improve range condition and increase production.

Stages of plant development keyed to specific plants determine opening dates of the grazing season, and indicate when livestock grazing could occur. Under a system of management which provides for deferred use or rest, vegetation readiness may not be as important since the plants are provided a period for recovery. Under such grazing systems, vegetation may be grazed earlier than indicated by the following guides, provided the soils are ready. The goal is to maintain or restore the better forage plants. Therefore, growth stages of the perennial plants, not annuals, would govern vegetation readiness.

Range readiness observations would be made at key areas within an allotment. Key species would be the plants observed with emphasis on those plants which are primary forage species. This is a judgment decision to be made on the allotment. A list of plants which may be considered as key species when conducting range readiness is available for each range site. These lists can be found in the SCS Rangesite Descriptions for each site. However, the plants listed in the SCS descriptions do not include species which may be present in seral stages below the potential natural community (PNC) or introduced species.

Altitude also has a strong influence on vegetative readiness dates. Generally, each 100-foot (30 meters) difference in elevation is equal to one day's difference in range readiness. Also, a 10 to 15 day delay can be expected on north slopes compared to south slopes.

Other factors to consider are that plants will not produce seed head every year or, depending on site or moisture conditions, plants may not attain desired heights. These factors would be watched for (particularly plant height growth) and judgment used when determining range readiness.

APPENDIXES

Table B-1

INDICATORS OF VEGETATIVE READINESS - SEASON-LONG RANGE¹

SPECIES	COMMON NAME	STAGE OF DEVELOPMENT INDICATING RANGE READINESS ²
Grasses:		
Agropyron smithii	Western wheatgrass	6-8" or more in height.
Agropyron spicatum	Bluebunch wheatgrass	8" or more in height, heading out.
Agrostis spp.	Redtop	Heading out.
Bromus carinatus	Mountain brome	8" or more in height, headed, panicle spreading.
Danthonia spp.	Oatgrass	In full bloom.
Deschampsia caespitosa	Tufted hairgrass	6" or more in height, heading out.
Festuca arizonica	Arizona fescue	8" or more in height, heading out.
Festuca idahoensis	Idaho fescue	6" or more in height, heading out.
Festuca thurberi	Therber fescue	12" or more in height, heading out.
Koeleria nitida	Prairie junegrass	Headed out.
Leucopoa kingii	Spike fescue	12" or more in height, heading out.
Muhlenbergia montana	Mountain muhly	6" or more in height, headed out.
Phleum alpinum	Alpine timothy	6" or more in height, headed out.
Poa alpina	Alpine bluegrass	Headed out, panicle open.
Poa fendleriana	Mutton grass	Plants maturing, seed in dough stage.
Poa pratensis	Kentucky bluegrass	Panicle fully opened.
Poa secunda	Sandburg bluegrass	Development slightly behind Muttongrass.
Stipa spp.	Needlegrass	6" or more in height, headed out to blooming.
Grasslike:		
Carex spp.	Sedges	Heads blooming
Carex aquatilis	Water sedge	7" - heading out.
Forbs:		
Balsamorhiza spp	Balsamroot	Full to past blooming.
Castilleja spp.	Indian paintbrush	Full bloom.
Delphinium spp.	Low larkspur	Full to past bloom.
	Tall larkspur	Full growth, blooming to past bloom.
Erigeron spp.	Fleabane, Daisy	Full bloom.
Eriogonum spp.	Wild buckwheat	Full bloom.
Geranium spp.	Geranium	Full to past bloom.
Lupinus spp.	Lupine	Early to full bloom.
Martensia spp.	Bluebell	Full bloom.
Penstemon spp.	Penstemon	Full to past bloom.
Polygonum bistorta	Bistort	Full to past bloom.
Potentilla spp.	Cinquefoil	Early to full bloom.
Taraxacum officinal	Common dandelion	Seed disseminated on most plants.
Thermopsis spp.	Golden pea	Full bloom.

Table B-1

INDICATORS OF VEGETATIVE READINESS - SEASON-LONG RANGE¹
(Cont'd)

SPECIES	COMMON NAME	STAGE OF DEVELOPMENT INDICATING RANGE READINESS ²
Valeriana spp.	Valerian	Fully developed, blooming.
Veratrum californicum	False hellebore	Budding to early bloom.
Wyethia spp.	Mules ear or Wyethia	Full bloom to plants starting to dry.
Zygadenus spp.	Deathcamas	Full bloom.
<u>Browse and Trees:</u>		
Amelanchier spp.	Serviceberry	Fruit forming.
Cercocarpus spp.	Mountain mahogany	Fully leafed.
Crataegus spp.	Hawthorn	In full bloom.
Populus tremuloides	Aspen	Fully leafed - deep green.
Potentilla fruticosa	Shrubby cinquefoil	In full bloom.
Prunus virginiana	Chokecherry	Full to past blooming
Purshia tridentata	Bitterbrush	In bloom.
Ribes spp.	Current, Gooseberry	Flowering 50% or more.
Salix spp.	Willow	Fully leafed.
Sambucus spp.	Elderberry	Full bloom.
Symphoricarpos spp.	Snowberry	Full leaf, budded to blooming.

¹ Source: USFS Range Analysis and Management Handbook, R-2, FSH 3/85 Amendment No. 15.

² In every case, the key forage perennial grass species should have reached the stage development listed. Leaf height is the average height of all leaves, except the few longest or the shortest, when held upright and measured.

Table B-2

RANGE TREATMENTS AND PROJECTS IN THE PLANNING AREA
FISCAL YEARS 1981-1991

Fiscal Year	Total Range Improvement Funds Expended ¹ (\$)	Number and Types of Projects Completed							
		Cattle Guards	Springs	Fences	Burns	Stock Trails	Spray Treatments	Pipelines	Spray Treatments and Seedings
81	61,500	15	21						
82	48,781	6	13	3	1	1			
83	107,048	6	25	4	4		1		
84	15,000		3	1	1			1	1
85	25,195	1	4	2	1				
86	14,900		1	3				1	
87	9,487		2	3					
88	14,940		4	2	1				
89	15,100	1	4	1	2				
90	13,070		2	3					

Notes: ¹ Costs are estimated

APPENDIX C VISUAL RESOURCE MANAGEMENT

VISUAL RESOURCE MANAGEMENT CLASSES

The Bureau of Land Management's Visual Resource Management (VRM) System provides a method for analyzing and managing visual resources on public lands. The basis of the VRM System is an inventory of visual resources. The components of the inventory are determinations of scenic quality, numbers of viewers, public attitudes regarding maintenance or modification of the scenery, the distance from which areas are viewed, and the existence of special considerations such as natural area or wilderness designations. All of these components are incorporated into a formula used to determine VRM classification ratings ranging from highly valued visual resource lands (VRM Class I and VRM Class II) to the least valued lands (VRM Class IV). A special fifth class (VRM Class R) is used to identify lands where rehabilitation is needed to improve visual qualities.

The management objectives for each VRM class are:

VRM CLASS I

Visual contrast caused by land use, development, or construction activities should be within low levels similar to those of natural or ecological changes typical in a given area. This protective classification is applied to wilderness areas, wild and scenic river corridors, natural landmarks, and other congressionally designated areas whose management is aimed at protecting their natural and scenic values.

VRM CLASS II

Visual contrast caused by land use, development, or construction activities should be within low to moderate levels. The changes should be relatively inconspicuous within their context.

VRM CLASS III

Visual contrast caused by management activities should be within moderate to high levels, but remain subordinate to the characteristic landscape.

VRM CLASS IV

Visual contrast caused by management activities may be high to extreme levels, and become a dominant feature within the context, but the design should incorporate elements found in the characteristic landscape context.

VRM CLASS IIR, IIIR, AND IVR

This interim classification is applied to areas where existing or proposed management activity has or will cause extreme visual contrasts without incorporating characteristic landscape elements in its design. The aim is to reclaim some of these elements to achieve visual contrast consistent with the objectives of the original class.

A low visually-contrasting project would be visible but should not attract the attention of a casual observer. A high visually-contrasting project would dominate the landscape and be a major focus of a casual observer.

The VRM system is utilized to determine appropriate visual design measures for proposed land uses. The degree of visual contrast between proposed projects and alternatives and the surrounding landscape are often compared as part of an overall environmental analysis of project proposals. As a result of this analysis, measures designed to reduce visual contrast or meet VRM class objectives are often incorporated into the design and construction methods of authorized land uses.

APPENDIX D

DISPOSAL TRACTS, ACQUISITION CRITERIA, RIGHTS-OF-WAY CORRIDORS, AND LANDS AND REALTY

PROPOSED RESOURCE MANAGEMENT PLAN CATEGORY I DISPOSAL TRACTS

1. T. 14 S., R. 86 W., Sec. 1: S 1/2 SE 1/4 SW 1/4 -20 acre isolated tract, on East River near town of Crested Butte, difficult to manage and is adjacent to private subdivision developments on two sides.
2. T. 15 S., R. 87 W., Sec. 1: Lot 2, SW 1/4 NE 1/4 - 80.11 acre isolated tract, near Carbon Creek that is uneconomical to manage; adjacent to USFS.
3. T. 15 S., R. 86 W., Sec. 7: NE 1/4 SE 1/4 - 40 acre isolated tract, near Baldwin that is uneconomical to manage.
4. T. 15 S., R. 84 W., Sec. 28: SE 1/4 SE 1/4 - 40 acre isolated tract, near Taylor River in Elsinor Ranch, difficult and uneconomical to manage.
5. T. 49 N., R. 3 E., Sec. 8: SE 1/4 SW 1/4 - 40 acre isolated tract, near Quartz Creek, difficult and uneconomical to manage.
6. T. 49 N., R. 2 E., Sec. 17: SE 1/4 NE 1/4, NE 1/4 SE 1/4 - 80 acre isolated tract, near Tomichi Creek that is difficult and uneconomical to manage.
7. T. 49 N., R. 5 W., Sec. 21: E 1/2 NE 1/4, NE 1/4 SE 1/4 - 120 acre isolated tract, difficult and uneconomical to manage.
8. T. 49 N., R. 5 W., Sec. 34: NE 1/4 - 160 acre isolated tract, difficult and uneconomical to manage; Current BuRec withdrawal in revocation process.
9. T. 48 N., R. 4-1/2 E., Sec. 24: Lot 6 - 3.78 acre isolated sliver of public land, difficult and uneconomical to manage; Templeton ranch.
10. T. 48 N., R. 3 W., Sec. 8: NE 1/4 - 160 acre isolated tract, difficult and uneconomical to manage.
11. T. 48 N., R. 3 W., Sec. 21: SW 1/4 NE 1/4, SE 1/4 NW 1/4, W 1/2 SE 1/4 - 160 acre isolated tract.
12. T. 48 N., R. 5 W., Sec. 9: Lots 1,2,3,4, W 1/2 NW 1/4, NW 1/4 SW 1/4 - Western part of Section, adjacent to NPS; - 212.96 acre isolated tract.
13. T. 48 N., R. 5 W., Sec. 20: Lot 9; Sec. 21: Lot 1 - 57.08 acre isolated tract.
14. T. 48 N., R. 6 W., Sec. 13: Lots 1, 2, and 7 - 121.98 acre isolated tract.
15. T. 48 N., R. 6 W., Sec. 25: SE 1/4 SE 1/4 - 40 acre isolated tract.
16. T. 47 N., R. 1 W., Sec. 29: NW 1/4 NW 1/4 - 40 acre isolated tract - Big Mud Pond Area.
17. T. 47 N., R. 1 W., Sec. 34: S 1/2 SW 1/4 - 80 acre isolated tract.
18. T. 47 N., R. 1-1/2 W., Sec. 25: N 1/2 NE 1/4 - 80 acre isolated tract.
19. T. 47 N., R. 3 W., Sec. 19: E 1/2 NE 1/4, NE 1/4 SE 1/4 - 120 acre isolated tract.
20. T. 47 N., R. 3 W., Sec. 20: NE 1/4 NW 1/4 - 40 acre isolated tract.
21. T. 47 N., R. 3 W., Sec. 20: NE 1/4 SW 1/4, S; 1/2 SW 1/4; Sec. 29: NW 1/4 - 280 acre isolated tract.
22. T. 47 N., R. 3 W., Sec. 20: SE 1/4 NE 1/4, NE 1/4 SE 1/4 - 80 acre isolated tract.
23. T. 47 N., R. 5 W., Sec. 8: Lot 14 - 20.45 acre isolated tract.

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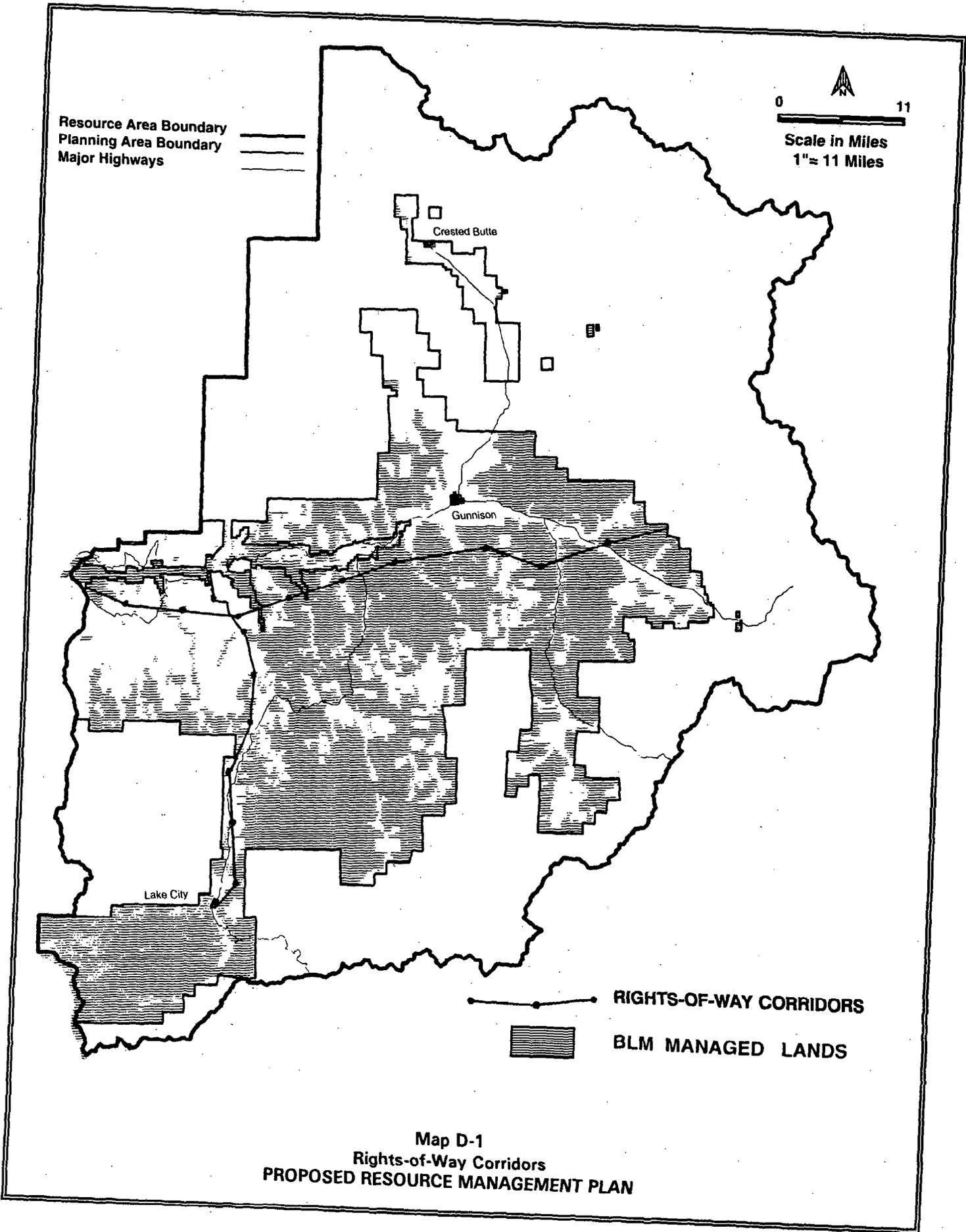
24. T. 47 N., R. 5 W., Sec. 9: Lot 22 - 19.45 acre isolated tract.
25. T. 47 N., R. 5 W., Sec. 10: Lots 1,3,4,5, NE 1/4 SE 1/4 - 133.43 acre isolated tract.
26. T. 47 N., R. 6 W., Sec. 14: SE 1/4 SE 1/4 - 40 acre isolated tract.
27. T. 47 N., R. 6 W., Sec. 14: NW 1/4 SW 1/4 - 40 acre isolated tract.
28. T. 46 N., R. 2 E., Sec. 12: SE 1/4 NE 1/4 - 40 acre isolated tract.
29. T. 46 N., R. 1 W., Sec. 33: SW 1/4 NE 1/4, Lot 1 - 82.58 acre isolated tract.
30. T. 46 N., R. 2 W., Sec. 11: Lots 2, 3, 5, 6, 7, 8, 9, 12 & 13 - 103.95 acres in four isolated slivers around Iron Hill.
31. T. 46 N., R. 2 W., Sec. 12: Lots 4, 5, 6, 7, 8, 9 & 10 - 75.46 acres in three isolated small tracts around Iron Hill.
32. T. 46 N., R. 3 W., Sec. 18: SW 1/4 SE 1/4 - 40 acre isolated tract near Indian Creek.
33. T. 46 N., R. 3 W., Sec. 17: SW 1/4 NE 1/4 - 40 acre isolated tract.
34. T. 46 N., R. 3 W., Sec 20: NE 1/4 SE 1/4 - 40 acre isolated tract.
35. T. 46 N., R. 3 W., Sec. 34: SW 1/4 NW 1/4 - 40 acre isolated tract.
36. T. 45 N., R. 2 E., Sec. 10: SE 1/4 NE 1/4 - 40 acre isolated tract.
37. T. 45 N., R. 2 E., Sec. 11: Lot 1 - 45.10 acre isolated tract.
38. T. 45 N., R. 1 W., Sec. 3: E 1/2 SW 1/4 - 80 acre isolated tract in Rock Creek.
39. T. 45 N., R. 1 W., Sec. 5: Lot 2 - 41.62 acre isolated tract.
40. T. 48 N., R. 4 E., Sec. 30: Se 1/4 NE 1/4 - 40 acre isolated tract.

41. T. 48 N., R. 3 W., Sec. 6: Lot 2 - 31.28 acre isolated tract.
42. T. 44 N., R. 4 W., Sec. 11: Lots 2, 3, 4, 7, 8, and 11; Sec. 14: Lots 12 and 13 - 70.97 acres; irregularly shaped parcels difficult to manage.
43. T. 43 N., R. 4 W., Sec. 9: NE 1/4 and SE 1/4, identified as Tract C on plat revised May 26, 1980 - .533 acres difficult and uneconomical to manage; this tract is too small to identify on map of the PRMP.

CRITERIA FOR LAND ACQUISITIONS

The following list of general land acquisition criteria will be used to evaluate potential parcels for acquisition, by any means:

1. Private lands within areas recommended as suitable for designation as wilderness or adjacent to such areas where the acquisition would add to the manageability and scenic value of the unit.
2. Private lands needed for management of wild and scenic rivers and wild and scenic study rivers.
3. Land adjacent to and inholdings within Special Recreation Management Areas and high value recreation areas.
4. Potential national or historic trails.
5. Potential natural or research natural areas or areas for cultural or natural history designation.
6. Potential areas of critical environmental concern.
7. Threatened or endangered species habitat areas.
8. Aquatic, riparian, and wetland habitat areas (streams, rivers, lakes, ponds).
9. Critical/crucial game winter range or other important wildlife habitat.
10. Floodplain areas (100-year) as defined in Executive Order 11988, dated May 24, 1977.
11. Private land that would improve public access.
12. High country summer range.



Resource Area Boundary
 Planning Area Boundary
 Major Highways

0 11
 Scale in Miles
 1" = 11 Miles

Crested Butte

Gunnison

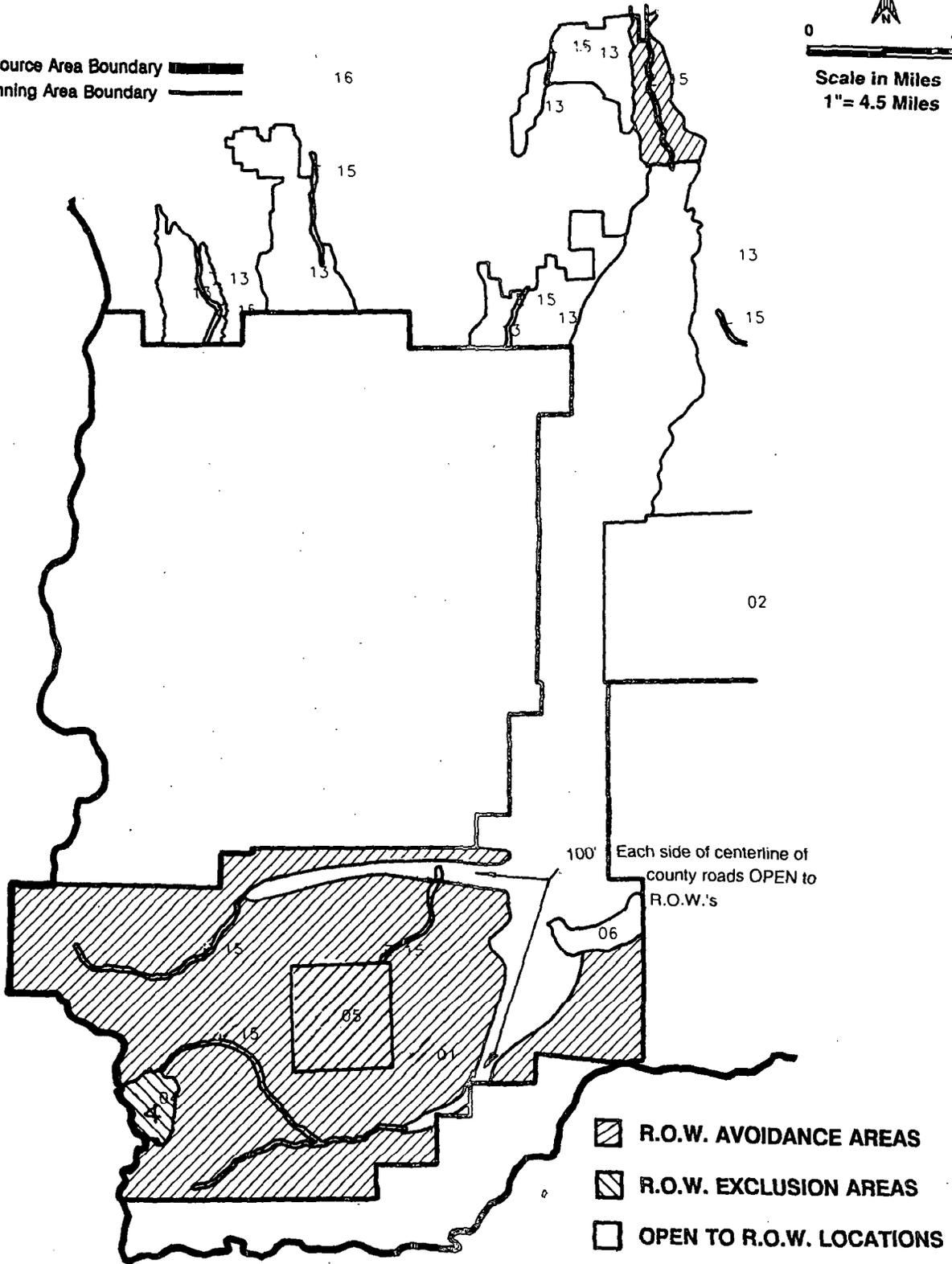
Lake City

RIGHTS-OF-WAY CORRIDORS
 BLM MANAGED LANDS

Map D-1
 Rights-of-Way Corridors
 PROPOSED RESOURCE MANAGEMENT PLAN

Resource Area Boundary 
 Planning Area Boundary 


 0  4.5
 Scale in Miles
 1" = 4.5 Miles



Map D-2
Rights-of-Way Avoidance and Exclusion Areas
and Areas Open to R.O.W.s in a Portion of the
PROPOSED RESOURCE MANAGEMENT PLAN

APPENDIX E SOCIO-ECONOMIC DATA

The following socio-economic information from Chapter Two and the Appendixes of the DRMP is included here as a result of comments received on this component during the comment period on the DRMP.

Paragraphs and tables from pages 2-1 through 2-4 of the DRMP:

POPULATION TRENDS

The total population for the ESA has increased about 32 percent over the 20-year period from 1970 to 1990. Gunnison and Hinsdale counties have experienced the largest increases in

population. Montrose has continued to have the largest population of the four counties in the ESA.

The ESA population is projected to increase to 52,658 (75 percent) from 1970 to 2010. For the same period, Hinsdale County is projected to have a 98 percent increase, the largest in the ESA; Gunnison County's population is expected to increase 119 percent, and Saguache County's population is expected to decline 32 percent over this same forty-year period. Table E-1 shows population changes expected in the ESA for the period 1970 to 2010.

Table E-1

ESA POPULATION, 1970-2010

ESA COUNTY											PER CENT CHANGE 1970- 2010
	1970	1975	1980	1985	PER CENT CHANGE 1970- 1985	1990 ¹	1995	2000	2005	2010	
Gunnison	7,714	9,396	10,720	11,173	45%	10,273	13,283	14,408	15,602	16,878	119%
Hinsdale	203	353	414	412	103%	467	406	429	454	484	98%
Montrose	18,357	20,468	24,546	25,595	39%	24,423	28,287	29,760	31,217	32,686	78%
Saguache	3,833	4,098	3,947	3,950	3%	4,619	3,557	3,250	2,935	2,609	32%
TOTALS	30,107	34,315	39,627	41,130	37%	39,782	45,534	47,848	50,209	52,658	75%

Source: Colorado Division of Local Government Demography Section (May 1991 Population Projections)

¹1990 U.S. Bureau of the Census

EMPLOYMENT AND INCOME

Employment in the ESA from 1982 through 1988 increased about seven percent. Employment stayed the same in Gunnison and Hinsdale counties. Montrose County's employment increased ten percent, and Saguache County employment increased 6.5 percent during the period 1982-1988.

The unemployment rates for the ESA have generally exceeded the 5.4 percent unemployment rate for Colorado for 1990. Unemployment rates for the ESA counties during 1990 were: Montrose, 7.9

percent; Hinsdale, 2.3 percent; Gunnison, 8.9 percent; and Saguache, 12.3 percent. The rate for the ESA during 1990 was 8.5 percent.

During 1988 over 75 percent of the employment in the ESA occurred in the four sectors of services (26 percent), retail trade (20 percent), Government (20 percent), and finance insurance and real estate (9 percent). The smallest sector of employment in the ESA in 1988, miscellaneous agricultural services, accounted for two percent of the work force. During 1988, the sectors accounting for the largest numbers of employment in the individual ESA counties were similar to the entire ESA. In Gunnison County 31

APPENDIXES

percent of the workforce was engaged in services and 23 percent were in retail trade. In Hinsdale County, 27 percent of all workers were in the retail trade sector, 26 percent were in government, and 21 percent worked in services. In Montrose County 25 percent of the workers were in the services sector, 19 percent were in government, and 19 percent were in retail trades. Saguache County's employment in government was 32 percent, 18 percent were in services, and 14 percent worked in retail trades. See Tables E-5 through E-9 for more information regarding employment and employment sectors in the ESA.

RETAIL SALES

Retail sales for the ESA counties increased 51 percent during 1980-1989. Hinsdale County had a 73 percent increase, the largest in the ESA, while Saguache County had an increase of 43 percent during 1980-1989. Table E-2 depicts retail sales in millions of dollars for the ESA.

HOUSING

Housing vacancy rates in all ESA counties were over 10 percent for 1980 and 1989. Vacancy rates less than 10 percent are indicative of a housing shortage. Although Table E-3 figures appear to show that all four counties could absorb light and perhaps heavy growth with existing housing, the vacancy rates shown may not take into account the large number of seasonal residents in Crested Butte, Lake City, and other communities in the ESA, or building conditions.

ECONOMIC SECTORS POTENTIALLY AFFECTED BY RESOURCE MANAGEMENT DECISIONS

Over 60 percent of the ESA workforce is in the service, Government, and trade sectors. Most potential effects on these sectors from BLM resource management decisions are indirect and immeasurable. Thus is it unlikely that any of the RMP/EIS alternatives will significantly impact these sectors representing well over the majority of economic earners.

Changes in recreation management could have localized economic impacts in the ESA, however, The planning area derives benefits from expenditures made for recreational activities, many of which are not presently quantified.

Tourism, or travel, economic impacts in the ESA for 1990 are quantified and shown in Table E-4. Travel generated employment represents about 10 percent of the total ESA employment; In 1990 Gunnison County travel related employment was 15 percent of the total county workforce; Hinsdale County had 47 percent of its employment related to travel, Montrose County had five percent related to travel, and Saguache County had nine percent of its employment related to travel. All ESA Counties are dependent on various tourism related income sectors for their socio-economic well being, especially Hinsdale County, with the least amount of private land tax base in the ESA. Population in Hinsdale County expands from approximately 400 during winter and spring months to 4600 during peak summer and autumn months.

Table E-2
TOTAL RETAIL SALES
(IN MILLIONS OF DOLLARS)

COUNTY	1980	1982	1986	1989
Gunnison	92.625	97.097	109.567	138.43
Hinsdale	3.898	5.304	5.548	6.73
Montrose	165.138	178.935	189.558	251.28
Saguache	19.232	18.223	19.341	27.58
ESA TOTALS	280.893	299.559	324.014	424.02

Source: Colorado Department of Revenue

APPENDIX E - SOCIO-ECONOMIC DATA

Table E-3

HOUSING UNITS AND VACANCY RATES BY COUNTY AND THE ESA

	GUNNISON			HINSDALE			MONTROSE			SAGUACHE			ESA		
	1980	1986	1989	1980	1986	1989	1980	1986	1989	1980	1986	1989	1980	1986	1989
Total Housing Units	5,283	7,099	7,544	701	854	987	9,423	10,252	11,340	1,885	1,918	2,284	17,832	20,123	22,155
Vacant Housing Units	2,039	2,727	3,037	538	689	827	995	1,164	1,619	525	464	884	4,097	5,044	6,367
Housing Unit Rate	35.02	38.41	40.26	76.75	80.68	83.79	10.56	11.35	14.28	27.85	24.19	38.70	22.98	25.07	28.74

Source: Division of Local Government, Demography Section, Local Government Survey

Table E-4

IMPACT OF TRAVEL ON ESA COUNTIES, Projected 1990

COUNTY	TOTAL TRAVEL EXPENDITURES (\$1,000)	TRAVEL GENERATED PAYROLL (\$1,000)	TRAVEL GENERATED EMPLOYMENT (JOBS)	STATE TAX RECEIPTS	LOCAL TAX RECEIPTS
Gunnison	45,972	9,454	1,053	1,480	655
Hinsdale	9,675	1,918	241	339	201
Montrose	22,497	4,473	551	793	285
Saguache	4,579	876	108	148	36
ESA TOTALS	72,723	16,721	1,953	2,760	1,177

Source: Colorado Tourism Board, U.S. Travel Data Center, County Travel Economic Impact Model (CTEIM)

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Table E-5

EMPLOYMENT AND LABOR FORCE - Gunnison County

	GUNNISON			PERCENT OF TOTAL		
	1982	1984	1988	1982	1984	1988
Mining	532	375	185	8.96	6.53	3.12
Construction	525	640	482	8.84	11.15	7.62
Manufacturing	178	125	119	3.00	2.18	2.00
Transportation	212	248	189	3.57	4.32	3.18
Wholesale Trade	65	44	46	1.09	0.77	0.78
Retail Trade	1,458	1,366	1,379	24.55	23.80	23.24
Finance, Insurance, Real Estate	518	504	546	8.72	8.78	9.20
Services	1,364	1,359	1,820	22.96	23.68	30.67
Government	1,038	1,025	1,124	17.47	17.86	18.94
Misc. Agriculture Services	50	54	74	0.84	0.94	1.25
Not Classified Elsewhere						
Total Nonfarming	5,940	5,740	5,934	100.00	100.00	100.00
Farming	359	349	363			
Total Employment by place of work	6,299	6,089	6,297			
County Labor Force						
Employment	5,434	5,324	5,131			
Unemployment	457	306	313			
Total Labor Force by place of residence	5,891	5,630	5,444			

Source: Colorado Division of Local Government County Profile
 (Blanks indicate suppressed data to avoid disclosure of confidential information).

APPENDIX E - SOCIO-ECONOMIC DATA

Table E-6

EMPLOYMENT AND LABOR FORCE - Hinsdale County

	HINSDALE			PERCENT OF TOTAL		
	1982	1984	1988	1982	1984	1988
Mining		0	0	0.00		
Construction	32	62	25	15.09	25.62	11.74
Manufacturing				0.00		
Transportation				0.00		
Wholesale Trade				0.00		
Retail Trade	61	69	57	28.77	28.51	26.76
Finance, Insurance, Real Estate		12	21	0.00	4.96	9.86
Services	31	36	44	14.62	14.88	20.66
Government	46	45	55	21.70	18.60	25.82
Misc. Agriculture Services	42	18		19.81	7.44	
Not Classified Elsewhere						
Total Nonfarming	212	242	213	100.00	100.00	100.00
Farming	23	24	23			
Total Employment by place of work	235	266	236			
County Labor Force						
Employment	220	682	499			
Unemployment	10	13	9			
Total Labor Force by place of residence	230	695	508			

Source: Colorado Division of Local Government County Profile
 (Blanks indicate suppressed data to avoid disclosure of confidential information).

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Table E-7

EMPLOYMENT AND LABOR FORCE - Montrose County

	MONTROSE			PERCENT OF TOTAL		
	1982	1984	1988	1982	1984	1988
Mining	809	750	262	7.78	7.12	2.26
Construction	689	688	742	6.63	6.53	6.41
Manufacturing	772	754	881	7.43	7.16	7.60
Transportation	1,043	946	967	10.03	8.96	8.35
Wholesale Trade	320	300	267	3.08	2.85	2.30
Retail Trade	1,869	1,827	2,186	16.07	28.51	18.87
Finance, Insurance, Real Estate	822	928	985	7.91	8.81	8.50
Services	2,029	2,325	2,914	19.52	22.06	25.15
Government	1,908	1,852	2,164	18.35	17.57	18.68
Misc. Agriculture Services	136	168	218	1.31	1.59	1.88
Not Classified Elsewhere						
Total Nonfarming	10,397	10,538	11,586	100.00	100.00	100.00
Farming	1,248	1,248	1,272			
Total Employment by place of work	11,645	11,786	12,858			
County Labor Force						
Employment	10,104	10,151	10,932			
Unemployment	1,423	1,337	1,224			
Total Labor Force by place of residence	11,527	11,488	12,156			

Source: Colorado Division of Local Government County Profile
 (Blanks indicate suppressed data to avoid disclosure of confidential information).

APPENDIX E - SOCIO-ECONOMIC DATA

Table E-8

EMPLOYMENT AND LABOR FORCE - Saguache County

	SAGUACHE			PERCENT OF TOTAL		
	1982	1984	1988	1982	1984	1988
Mining		26		0.00	2.16	
Construction	75	80	92	6.19	6.64	7.00
Manufacturing				0.00	0.00	
Transportation	31	36	40	2.56	2.99	3.04
Wholesale Trade	84		90	6.94	0.00	6.84
Retail Trade	154	140	180	12.72	11.63	13.69
Finance, Insurance, Real Estate	119	69	78	9.83	5.73	5.93
Services	208	290	241	17.18	24.09	18.33
Government	385	373	420	31.79	30.98	31.94
Misc. Agriculture Services	128	103	148	10.57	8.55	11.25
Not Classified Elsewhere						
Total Nonfarming	1,211	1,204	1,315	100.00	100.00	100.00
Farming	511	500	519			
Total Employment by place of work	1,722	1,704	1,834			
County Labor Force						
Employment	1,926	1,452	1,453			
Unemployment	263	229	250			
Total Labor Force by place of residence	2,189	1,681	1,703			

Source: Colorado Division of Local Government County Profile
 (Blanks indicate suppressed data to avoid disclosure of confidential information).

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Table E-9

EMPLOYMENT AND LABOR FORCE - Four County ESA

	ESA			PERCENT OF TOTAL		
	1982	1984	1988	1982	1984	1988
Mining	1,341	1,151	447	7.55	6.49	2.35
Construction	1,321	1,470	1,311	7.44	8.29	6.88
Manufacturing	950	879	1,000	5.35	4.96	5.25
Transportation	1,286	1,230	1,196	7.24	6.94	6.28
Wholesale Trade	469	344	403	2.64	1.94	2.12
Retail Trade	3,542	3,402	3,802	19.94	19.19	19.96
Finance, Insurance, Real Estate	1,459	1,513	1,630	8.22	8.54	8.56
Services	3,632	4,010	5,019	20.45	8.54	26.35
Government	3,377	3,295	3,763	19.01	22.62	19.75
Misc. Agriculture Services	314	325	440	1.77	1.83	2.31
Not Classified Elsewhere	69	105	37	0.39	0.59	0.19
Total Nonfarming	17,760	17,724	19,048	100.00	100.00	100.00
Farming	2,141	2,121	2,177			
Total Employment by place of work	19,901	19,845	21,225			
County Labor Force						
Employment	17,684	17,609	18,015			
Unemployment	2,153	1,885	1,796			
Total Labor Force by place of residence	19,837	19,494	19,811			

Source: Colorado Division of Local Government County Profile
 (Blanks indicate suppressed data to avoid disclosure of confidential information).

APPENDIX F

RECREATION MANAGEMENT AND WILDERNESS STUDY AREAS

CONTENTS OF APPENDIX F

Appendix F consists of Maps F-1 through F-5 and Tables F-1 and F-2. Maps F-1 through F-3 depict areas that are open or closed to motorized vehicle use or where use is limited either to designated routes yearlong or seasonally if necessary, for the Proposed Resource Management Plan (PRMP). Maps F-4 and F-5 depict existing Wilderness Study Areas (WSAs) and Special Recreation Management Areas. Table F-1 lists the designated routes along which motorized travel would be permitted in the PRMP. Table F-2 shows the acreage of each WSA in each management unit in the PRMP.

Table F-1
 DESIGNATED OFF-HIGHWAY VEHICLE ROUTES
 FOR THE PROPOSED RESOURCE MANAGEMENT PLAN
 (See Maps F-1 and F-2 for location of routes 1-17)

MAP F-1 REFERENCE NUMBER ¹	DESIGNATED ROUTE
1	BLM Road #3300 from Lake City, generally along Henson Creek to Engineer Pass and Planning Area boundary.
2	BLM Road #3303 along Nellie Creek to USFS boundary.
3	From BLM Road #3300 north along North Fork Creek to USFS boundary; includes a short segment that reenters BLM managed land upstream along North Fork Creek.
4 ³	BLM Road 3320 from BLM Road #3300, south and east along Schaeffer Gulch, and to head of Hurricane Basin ³ .
5	BLM Road #3306, from Colorado Highway 149, generally along Lake Fork of the Gunnison River to Cinnamon Pass and Planning Area boundary.
6	BLM Road #3314 from BLM Road #3306 to about 0.8 miles north of Sloan Lake, in American Basin.
7	BLM Road #3309 along Cottonwood Creek, from Road #3306 to Junction of Snare Creek and Cuba Gulch.
8	BLM Road #3308 along Wager Gulch from BLM Road #3306 to USFS boundary.
9 ³	From Road #3306 south of Lake San Cristobal in Red Mountain Gulch area, north generally to the northern part of section 29, T. 43 N., R. 4 W. ³
10	BLM Road #3322 from Colorado Highway 149, and a trail extension at road's end to the USFS boundary.
11 ³	From Colorado Highway 149 NE to bridge over Lake Fork of The Gunnison River, then approx. 1 mile north along existing two-track road paralleling river to a designated terminus. ³
12	BLM Road #3305 from Colorado Highway 149 south of Lake City to a radio tower.

THE NEXT SEVEN ROUTES , a) THROUGH g), ARE LOCATED IN THE ALPINE TRIANGLE SRMA, AND ARE TOO SHORT TO SHOW UP ON MAP F-1

- a)³ From BLM Road # 3306 southeast into the meadow across from the gravel pit; approximately 150 yards; T. 42 N., R. 4 W., Sec. 4: NE1/4NW1/4.
- b)³ From BLM Road # 3306 east of Bent Creek, north to several undeveloped campsites; approximately 100 yards; T. 42 N., R. 5 W., Sec. 11: SW1/4SE1/4.
- c)³ From BLM Road # 3306 west of Bent Creek, south past the Bent Creek restroom to several undeveloped campsites; approximately 120 yards; T. 42 N., R. 5 W., Sec. 11: SW1/4SE1/4.
- d)³ From BLM Road # 3309 (Cottonwood Creek Road), beginning about 100 yards beyond the Cataract Gulch trailhead, south to an undeveloped campsite; approximately 70 yards; T. 42 N., R. 5 W., Sec. 17: SE1/4.

**MAP F-1
REFERENCE
NUMBER¹**

DESIGNATED ROUTE

- e)³ From BLM Road # 3306 southeast to the Bon Homme mine; approximately .25 miles; T. 43 N., R. 6 W., Sec. 34: SE1/4, Sec. 35: SW1/4.
- f)³ From BLM Road # 3300 northeast to the Nellie Creek meadow; approximately 100 yards; T. 44 N., R. 5 W., Sec. 35: SW1/4NE1/4.
- g)³ From BLM Road # 3300 southwest to the Capitol City toilet and corral; approximately .25 miles; T. 43 N., R. 4 W., Sec. 12: SE1/4.
- 13² BLM Road #3087 (the Rainbow Lake Road) generally along East Fork Dry Creek to USFS boundary².
- 14² Deep Gulch and Maggie Gulch Roads from Ohio Creek Road to West Antelope Creek Road and USFS boundary².
- 15² BLM Road #3110 along Sheep Gulch and Lost Canyon to USFS boundary².
- 16² BLM Road #3105 from Quartz Creek in North Parlin Flats vicinity to USFS boundary².
- 17³ See Map F-2 for designated routes in Unit 8, South Beaver Creek recommended ACEC.
-

- Notes: ¹ See numbers and routes on Maps F-1 and F-2 for general locations
- ² These routes would continue to be designated OHV routes, if necessary, in the event of heavy snowfalls and concentrated elk or deer herds from 12-1 through 3-31.
- ³ These are newly designated routes for OHV use in the PRMP.

Table F-2

EXISTING BLM WILDERNESS STUDY AREA ACRES
AND RECOMMENDED WILDERNESS AREA ACRES

POWDER- HORN	AMERICAN FLATS	RED CLOUD PEAK	BILL HARE GULCH	LARSON CREEK	HANDIES PEAK
WSA ² /RWA ²	WSA/RWA	WSA/RWA	WSA/RWA	WSA/RWA	WSA/RWA
54,059/47,982	4,617/1,497	37,579/0	370/0	880/0	16,742/0

Notes:

- ¹ These acre figures were calculated using BLM's GIS computerized program, and are approximate; these figures do not equal the acre figures in BLM's Wilderness Study Reports and EISs.
- ² WSA = Wilderness Study Area; RWA = Recommended Wilderness Areas; WSAs were studied and reported on separately from this RMP/EIS.

Table F-3

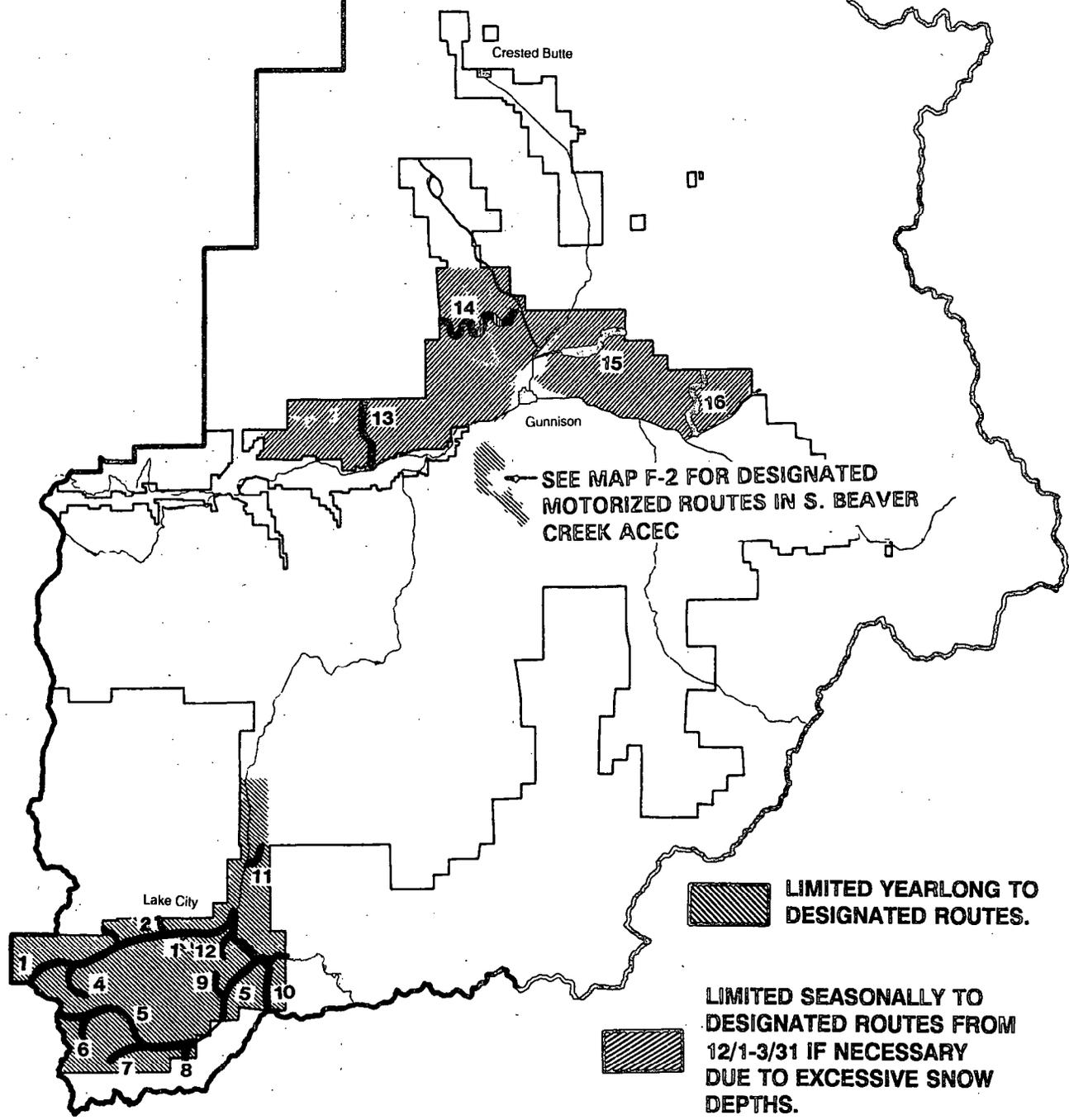
APPROXIMATE BLM WILDERNESS STUDY AREA AND RECOMMENDED WILDERNESS AREA
ACRES IN EACH MANAGEMENT UNIT IN THE PROPOSED RESOURCE MANAGEMENT PLAN

MGT UNIT	POWDER- HORN	AMERICAN FLATS	RED CLOUD PEAK	BILL HARE GULCH	LARSON CREEK	HANDIES PEAK
	WSA ² /RWA ²	WSA/RWA	WSA/RWA	WSA/RWA	WSA/RWA	WSA/RWA
1	2,487/0	4,617/1,497	31,223/0	370/0	880/0	14,694/0
2	47,982/47,982					
4						1,467/0
5			5,935/0			
12	13/0					
13	3,490/0					
15	5/0		421/0			581/0
16	82/0					

Notes:

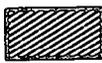
- ¹ These acre figures were calculated using BLM's GIS computerized program, and are approximate; these figures do not equal the acre figures in BLM's Wilderness Study Reports and EISs.
- ² WSA = Wilderness Study Area; RWA = Recommended Wilderness Areas; WSAs were studied and reported on separately from this RMP/EIS.

Resource Area Boundary _____
 Planning Area Boundary _____
 Major Highways _____



SEE MAP F-2 FOR DESIGNATED
 MOTORIZED ROUTES IN S. BEAVER
 CREEK ACEC

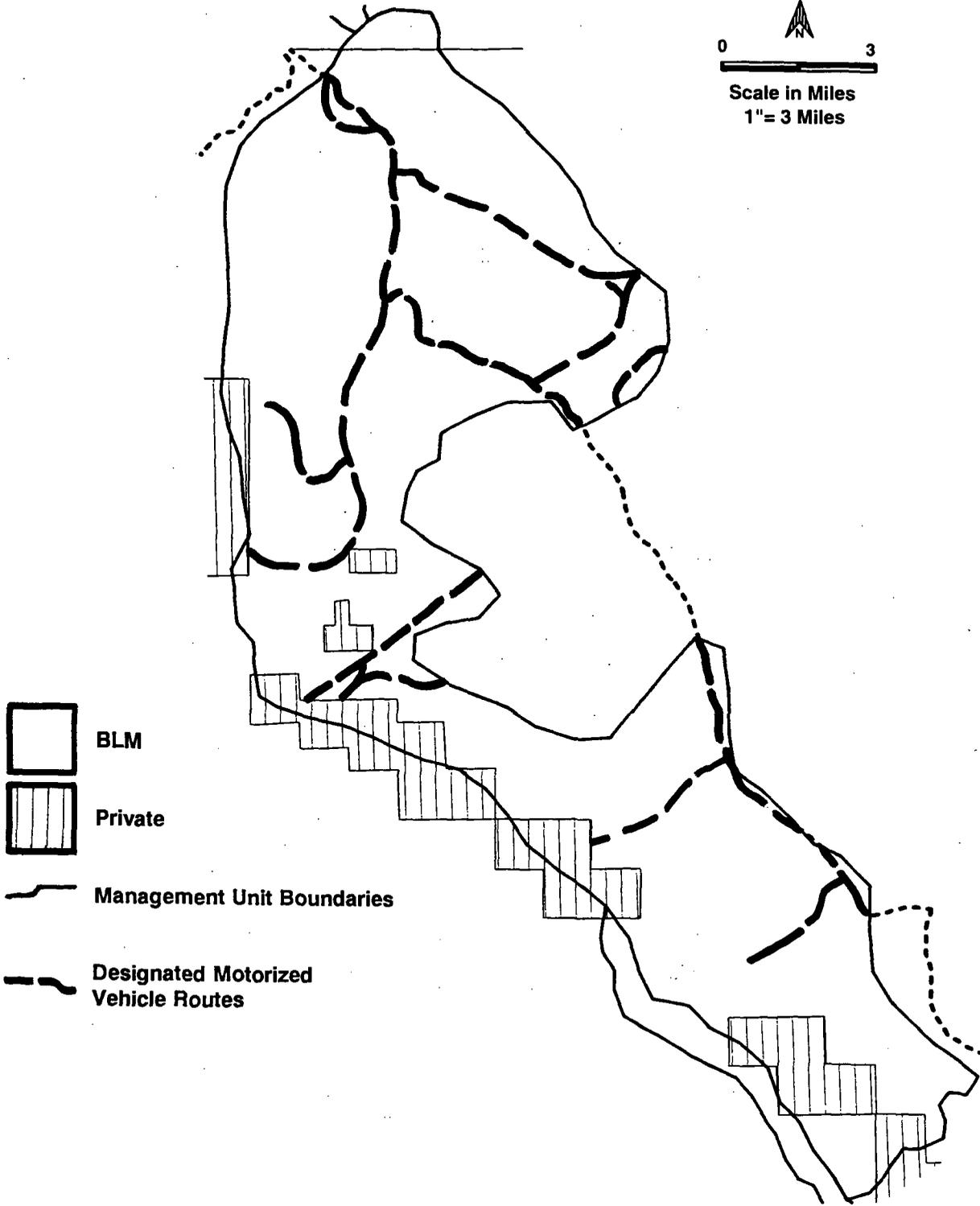
 LIMITED YEARLONG TO
 DESIGNATED ROUTES.

 LIMITED SEASONALLY TO
 DESIGNATED ROUTES FROM
 12/1-3/31 IF NECESSARY
 DUE TO EXCESSIVE SNOW
 DEPTHS.

Public lands where OHV use is not limited
 (seasonally or yearlong) or closed are OPEN
 to OHV use.

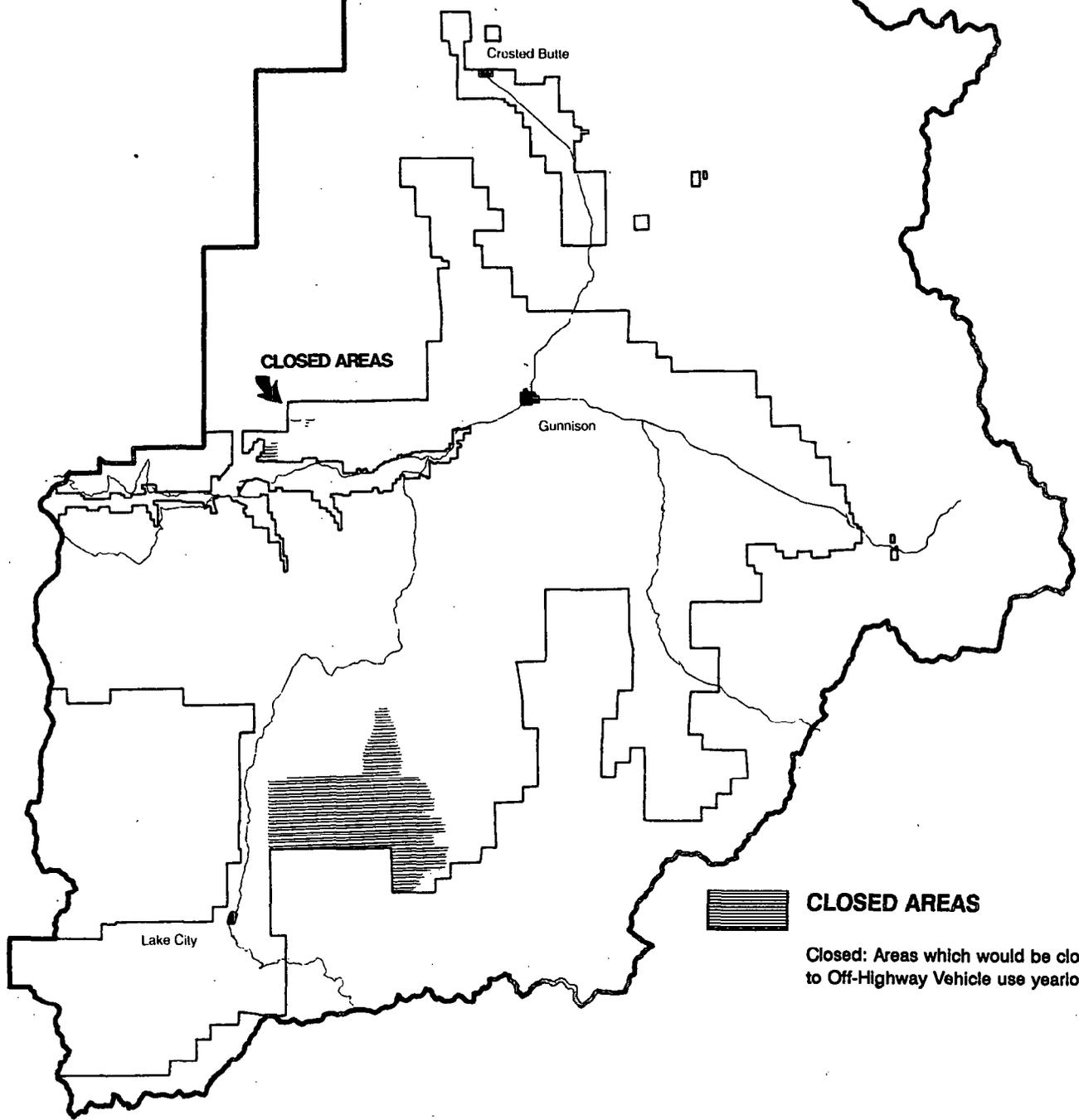
 DESIGNATED MOTORIZED VEHICLE
 ROUTES. (SEE TABLE F-1 FOR
 ROUTE DESCRIPTIONS)

Map F-1
 Off-Highway Vehicle Use
 Limited Areas
 PROPOSED RESOURCE MANAGEMENT PLAN



Map F-2
Off-Highway Vehicle Use
Designated Routes, Unit 8, S. Beaver Creek Proposed ACEC
PROPOSED RESOURCE MANAGEMENT PLAN

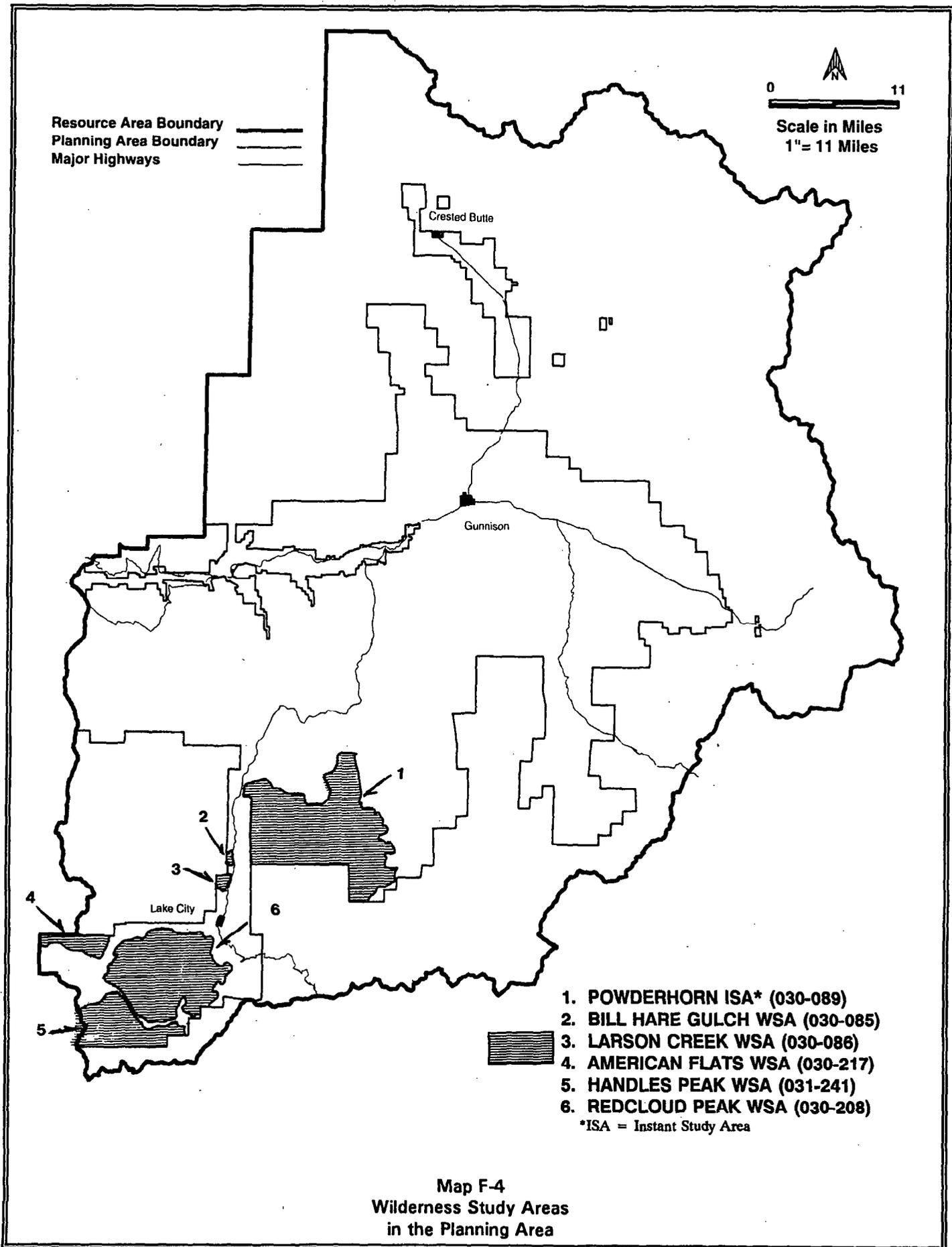
Resource Area Boundary ———
 Planning Area Boundary ———
 Major Highways ———



 **CLOSED AREAS**
 Closed: Areas which would be closed to Off-Highway Vehicle use yearlong.

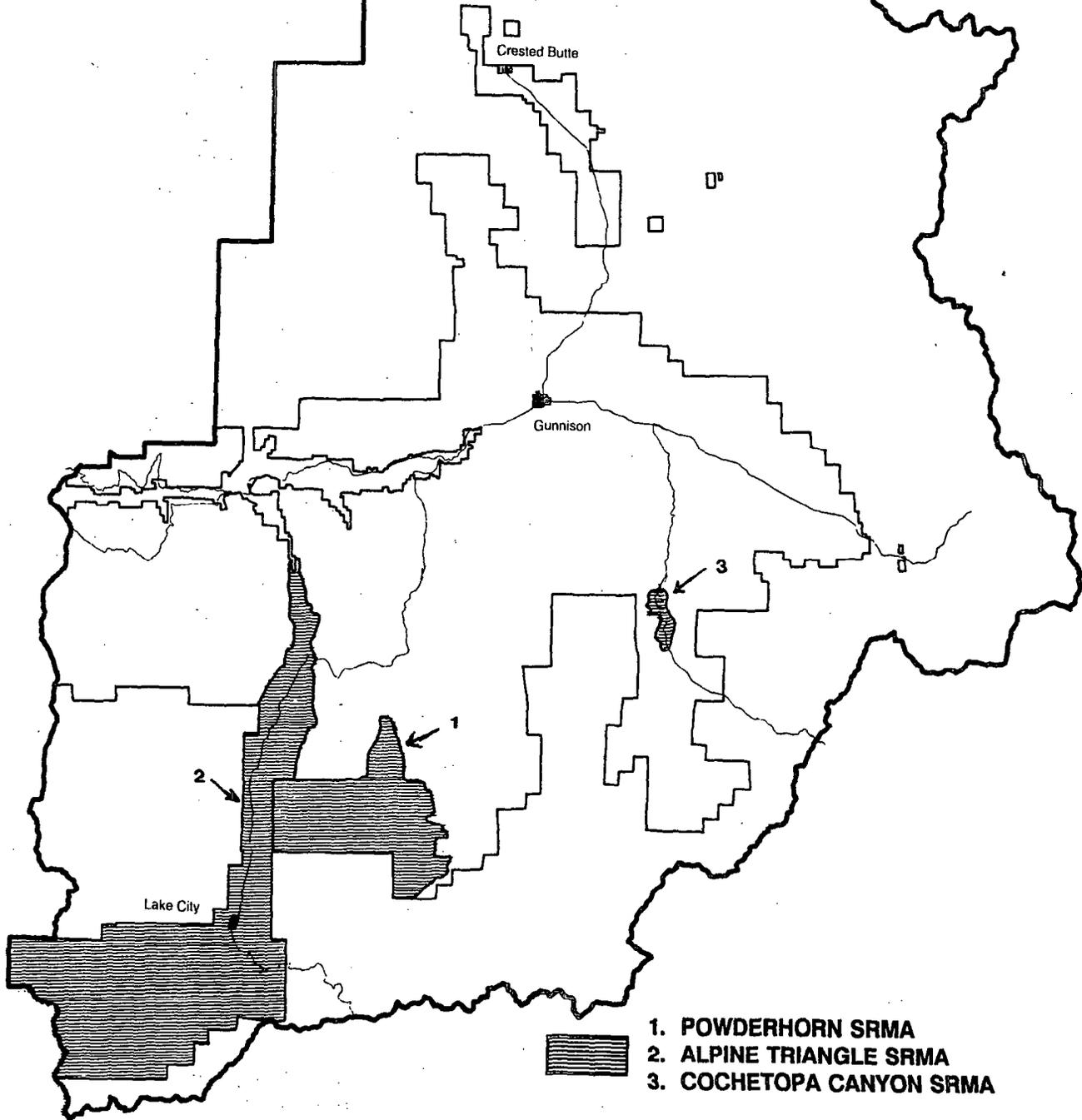
Public lands where OHV use is not limited (seasonally or yearlong) or closed are OPEN

Map F-3
Off Highway Vehicle Use
Closed Areas
PROPOSED RESOURCE MANAGEMENT PLAN



Resource Area Boundary ———
Planning Area Boundary ———
Major Highways ———

0 11
Scale in Miles
1" = 11 Miles



- 1. POWDERHORN SRMA
- 2. ALPINE TRIANGLE SRMA
- 3. COCHETOPA CANYON SRMA

Public Lands not included in the above SRMAs are contained within the Gunnison Extensive Recreation Management Area.

Map F-5
Special Recreation Management Areas
in the Planning Area

APPENDIX G

MITIGATING MEASURES

Appendix G lists examples of possible mitigating measures which would be incorporated into use authorizations and activity plans to protect specific resources that are identified below. This list is not intended to be a comprehensive listing of all possible mitigating measures.

SOIL AND WATER RESOURCES

Restriction of surface disturbances along waterways
Restrictions on forage utilization levels
Closure and rehabilitation of roads

RIPARIAN AREAS

Requirement for fencing
Closure and rehabilitation of roads
Restrictions on forage utilization levels
Reclamation of disturbed areas

THREATENED, ENDANGERED, AND SENSITIVE SPECIES

Relocation of surface-disturbing activities
Relocation of the individual plant or animal
Off-site replacement of critical habitat

WILDLIFE HABITAT

Development of drop structures on streams
Rehabilitation of disturbed sites
Restrictions on forage utilization levels
Seasonal or permanent road closures
Requirement for increased edge areas
Limitations on size of disturbances

LIVESTOCK GRAZING

Requirement for reseeding of disturbed areas with palatable species
Requirement for fencing of areas hazardous to livestock
Development of alternative water sources
Installation of cattleguards

FORESTRY

Requirement to leave snag trees, if opportunity to do so is present
Restrictions on burning
Requirement for waterbars or culverts in road construction

RECREATION

Acquisition of alternative access
Alterations in project design
Relocation of roads
Requirement for fencing of recreational sites

CULTURAL AND PALEONTOLOGICAL RESOURCES

Restrictions on road construction
Requirement for intensive testing and excavation
Relocation of surface-disturbing activities
Requirement for on-site inspections during project development

APPENDIX H

AREAS OF CRITICAL ENVIRONMENTAL CONCERN

RESOURCE MANAGEMENT PLANNING AND AREAS OF CRITICAL ENVIRONMENTAL CONCERN

1. Definition:

An Area of Critical Environmental Concern (ACEC) is an area on public land containing important historic, cultural and scenic values, fish or wildlife resources (species or habitat), or other natural systems or processes. An ACEC can also be an area for which protection of human life and safety from natural hazards is felt necessary. An ACEC management plan would be prepared for officially designated areas and actions would be implemented to carry out whatever special management is needed to insure that an ACEC's values are protected to the required degree.

2. Characteristics of ACECs:

To be considered as a potential ACEC and analyzed in resource management plan alternatives, an area must meet the criteria of relevance and importance, as established and defined in 43 CFR 1610.7-2.

A. Relevance. An area meets the "relevance" criterion if it contains one or more of the following:

1. A significant historic, cultural, or scenic value (including, but not limited to, rare or sensitive archaeological resources and religious or cultural resources important to Native Americans).

2. A fish and wildlife resource (including, but not limited to habitat for endangered, sensitive or threatened species, or habitat essential for maintaining species diversity).

3. A natural process or system (including, but not limited to, habitat for endangered, sensitive or threatened species; rare, endemic, or relic plants or plant communities which are terrestrial, aquatic or riparian; or rare geological features).

4. Natural hazards (including, but not limited to, areas of avalanche, dangerous flooding, landslides, unstable soils, seismic activity, or dangerous cliffs). A hazard caused by human action may meet the relevance criteria if it is determined through the resource management planning process that it has become part of the natural process.

B. Importance. The value, resource, system, process, or hazard described above must have substantial significance and values in order to satisfy the "importance" criteria. This generally means that the value, resource, system, process, or hazard is characterized by one or more of the following:

1. Has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern, especially compared to any similar resource.

2. Has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened, or vulnerable to adverse change.

3. Has been recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandates for FLPMA.

4. Has qualities which warrant highlighting in order to satisfy public or management concerns about safety and public welfare.

5. Poses a significant threat to human life and safety or to property.

C. Special Management Attention. To be designated as an ACEC, an area must require special management attention to protect the important and relevant values. Therefore, areas which have important and relevant resource values and for which special management attention is prescribed are to be designated as ACECs using the procedures set forth in this section. "Special management attention" refers to management prescriptions developed during

APPENDIXES

preparation of an RMP, including proposed actions deemed to be in conformance with the terms, conditions, and decisions of the RMP. These are management measures which would not be necessary and prescribed if the critical and important features were not present. That is, they would not be prescribed in the absence of the designation. (In other words, the concept of special management is relative.) A management prescription is considered to be special if it is unique to the area involved and includes terms and conditions specifically to protect the important and relevant value(s) occurring on that area. For example, a seasonal use stipulation on permits or other use authorizations may be prescribed specifically to protect life and safety from natural hazards. Management prescriptions providing special management attention should include more detail than prescriptions for other areas and should establish priority for implementation. Special management often provides for consultation and coordination with identified groups and/or experts having interest or expertise in the affected values.

3. ACECs and BLM's RMP/EIS Process

A. Potential ACECs nominated by BLM, other agencies, and public.

B. ACEC nominations are examined for adherence to "relevance, importance" criteria in BLM Manual 1613.

C. ACEC nominations meeting criteria become "Potential ACECs, written into RMP draft Alternatives, with their "management prescriptions".

D. "Potential ACECs" published in BLM's Draft Alternative description, for public review, comment. Nominations not forwarded to Alternatives justified.

E. Comments on "Potential ACECs" analyzed, considered along with all other comments on Draft Alternatives, changes made to "Potential ACECs" as needed, justifications written.

F. "Potential ACECs" considered further in analyzing impacts of recommendations in the Alternatives, including those effects of ACEC

"management prescriptions". BLM's Preferred Alternative developed, with "PROPOSED ACECs"; other alternatives still have "Potential ACECs".

G. "PROPOSED" and "Potential" ACECs described, published in Draft RMP/Eis, and commented on for 90 days. All previous changes, or drops in nominated or "Potential" ACECs justified in Appendix of Draft.

H. Comments on "PROPOSED" and "Potential" ACECs, analyzed, changes made, justifications written, BLM's proposed RMP/Final EIS written, readied for publication to public. ACECs passing this screen to be "Recommended" ACECs.

I. Proposed RMP/Final EIS published, 30 days to protest recommendations in documents, including the "Recommended ACECs". Changes made in ACECs from Draft to this document will be explained.

J. BLM responds to protests, if any, then State Director approves RMP via a "Record of Decision" that, when published in the Federal Register, officially designates all ACECs in the Approved RMP.

K. Designated ACECs, and their management prescriptions, are implemented including writing of additional action plans for ACECs requiring that detail.

Table H-1

ACEC NOMINATIONS THAT DID NOT MEET SCREENING CRITERIA

AREA NAME AND NOMINATOR ¹	ANALYSIS OF SCREENING CRITERIA
Lake City Caldera (CEC)	The area nominated is not a caldera; the nomination does not meet either the relevance or importance criteria.
Cebolla Creek Garnet Area (CEC)	The values for which this area was nominated (garnet-bearing deposits) are not rare, nor is their potential in the area for the occurrence of gem-quality garnets; no immediate threat to the values present; the nomination does not meet either the relevance or importance criteria.
Horseshoe Basin Glacial Rock Area (BLM)	The occurrence of these glacial rocks is neither rare nor unique; the nomination does not meet either the relevance or importance criteria.
Red Mountain Scenic Area (CEC)	The values for which this area was nominated (high-quality scenic values) are not rare, unique, nor significant in the region or the local area; no immediate threat to the values present; the nomination does not meet either the relevance or importance criteria.
East Elk Creek to Red Creek Paleontological Area (NPS)	The area nominated, other than in Haystack Cave (a potential ACEC), does not possess the potential for occurrence of fossils in any great abundance; the nomination does not meet either the relevance or importance criteria.
Address Exchange Tract Elk and Deer Crucial Winter Range (Gunnison County)	The size of the nomination does not contribute significantly to the viability of elk and deer populations; the nomination does not meet either the relevance or importance criteria; no immediate threat to habitat.
Cebolla Creek Fish Spawning Crucial Habit at Area (NPS)	The fishery as an individual resource does not contribute significantly to the viability of trout species or populations; no immediate threat to the values present; the nomination does not meet either the relevance or importance criteria.

Note: ¹ CEC = Colorado Environmental Coalition; NPS = National Park Service; BLM = Bureau of Land Management

APPENDIXES

Table H-2

POTENTIAL AREAS OF CRITICAL ENVIRONMENTAL CONCERN
 CONSIDERED IN ALTERNATIVES IN THE DRAFT
 RESOURCE MANAGEMENT PLAN AND THE
 PROPOSED RESOURCE MANAGEMENT PLAN

NAME OF AREA AND VALUES	RELEVANCE AND IMPORTANCE	ACRES	NOMINATED BY:
<p>1. Alpine: Historical/ cultural, recreation, and scenic values (includes view shed as seen from the Lake Fork and Henson Creek roads); considered in Alternative B; originally nominated as the American Flats (historical and recreation values) area.</p>	<p>Relevance: Significant cultural and historic values present on public lands; intensively used for recreation (hiking, 4 wheel drive touring, camping, sightseeing). Significant scenic loop drive approximately 50 miles in length (Lake City as beginning and end of drive); traverses Engineer and Cinnamon passes and follows shore of Lake San Cristobal.</p> <p>Importance: Significant regional and national awareness; destination for commercial four wheel drive tour and rental companies; element in the "Alpine Explorer", a BLM information and education publication; important to economy of Lake City; area is fragile in many locations; historic sites are deteriorating; known threat to historic, scenic values from mining and vandalism, potential threat from development; contains existing 2,300 acre scenic withdrawal along Henson Creek and Lake Fork roads; drive extends into adjacent BLM San Juan Resource Area; historic mining setting; known and potential threats to foreground and middle ground landscapes from private land development and mining.</p>	<p>88,663 BLM; Contains several other potential ACECs</p>	<p>Rick Athearn, Arden Anderson, BLM</p>
<p>2. Haystack Cave: Paleontological values; considered in Alternative D as a separate ACEC.</p>	<p>Relevance: Significant paleontological site; 1/3 of total fossils still present; 14,000 year old potential pleistocene remains; most of site has been excavated.</p> <p>Importance: Regionally significant; archaeological site also; unique research site; nominated to National Register of Historic Places; only known site containing both shrub ox and Woodland musk ox remains; 60,000 faunal specimens, 40 species; potential threat from vandalism.</p>	<p>5 BLM in Alternative D; Included in W. Antelope Creek ACEC in Alt. B, E and PRMP.</p>	<p>Colorado Environmental Coalition¹</p>
<p>3. South Beaver Creek: Proposed Colorado Natural Area; <i>Astragalus microcymbus</i> (skiff milkvetch) populations; considered in Alternative B, D, E and PRMP.</p>	<p>Relevance: Contains populations of USF&WS Category II plant species (also recommended as an endangered species).</p> <p>Importance: Managed under cooperative agreement with Colorado Natural Areas Program; proposed Research Natural Area; research potential by a N.M. University; known threat to plant populations from grazing and wildlife.</p>	<p>4,625 BLM In Alternative B; 9,895 BLM In Alternative D; 4,565 BLM In Alternative E and PRMP.</p>	<p>USF&WS, Joe Capodice, BLM</p>

Table H-2

**POTENTIAL AREAS OF CRITICAL ENVIRONMENTAL CONCERN
CONSIDERED IN ALTERNATIVES IN THE DRAFT
RESOURCE MANAGEMENT PLAN AND THE
PROPOSED RESOURCE MANAGEMENT PLAN**

NAME OF AREA AND VALUES	RELEVANCE AND IMPORTANCE	ACRES	NOMIN- ATED BY:
4. Powderhorn: Recreation and scenic values; considered in Alternative B	<p>Relevance: Existing primitive area; significant visual variety (scenery); back country recreation area; no motor vehicle use allowed.</p> <p>Importance: Nationally known primitive area; closed to motor vehicle use; scenic values high; receives moderate amount of recreation use.</p>	47,983 BLM	Arden Anderson, BLM
5. East Gunnison: Crucial big game winter range; considered in Alternative B.	<p>Relevance: Contains habitat necessary for maintaining mule deer and elk populations.</p> <p>Importance: Attracts hunters nationally; high concentrations of elk and deer compared to areas south of U.S. 50; known threat to critical range from grazing.</p>	37,503 BLM in Alternative B.	Ralph Clark III, Joe Capodice, BLM
6. Sapinero: Crucial big game winter range.	<p>Relevance: Important significant habitat for maintaining species diversity of elk and deer; first acquisition under Pittman Robinson (historic relevance); contains Sapinero State Wildlife Area.</p> <p>Importance: Attracts hunters nationally; historic acquisition; significant habitat regionally; high concentrations of elk and deer; important for herd viability; limited OHV classifications, closed in Sapinero State Wildlife area; potential threat to critical range from grazing.</p>	4,518 BLM; included in W. Antelope Cr. ACEC in Alternatives B, E, and PRMP.	Joe Capodice, BLM
7. Lake Fork Canyon: Scenic and wildlife values, and historic railroad work camps; considered in Alternative B and D.	<p>Relevance: Contains nine historic railroad work camps; receives 20,000 Recreations User Days annually; contains a 10-animal bighorn sheep herd; high quality trout fishing; high value scenery.</p> <p>Importance: Significant regional recreation values (fishing, camping, viewing scenery); important brown trout fishery.</p>	4,685 BLM in Alternative B; 4,800 BLM in Alternative D.	National Park Service (NPS), Arden Anderson, BLM

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Table H-2

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 PROPOSED RESOURCE MANAGEMENT PLAN

NAME OF AREA AND VALUES	RELEVANCE AND IMPORTANCE	ACRES	NOMIN- ATED BY:
8. Dillon Pinnacles: Scenic and geologic values; considered in Alternatives D, E, and PRMP.	Relevance: Outstanding example of eroded volcanic mudflow; high recreation use; accessible and visible for miles; significant photo subject. Important: Regionally significant; vertical spires (pinnacles) warrant highlighting; potential threat to view shed from private land development.	190 BLM in Alternative D; 532 BLM in Alternative E and PRMP; included with W. Antelope Cr. ACEC in Alternative B.	CEC, Arden Anderson, BLM
9. Bighorn Sheep-A: Bighorn Sheep habitat (name changed from Lake City Bighorn Sheep Range) now is the smaller of the two original areas; in the N.W. corner of American Flats; considered in Alternative D.	Relevance: Summer and winter range important to diversity of species, about 30 head in Bighorn A & B. Importance: Regionally and nationally significant habitat; fragile resources; disease could endanger herd; sensitive species using the habitat; known threat to values from grazing (domestic sheep).	3,912 BLM in Alt. D; Included in Alpine ACEC, in Alt. B.	Joe Capodice, BLM
10. Bighorn Sheep-B: Bighorn Sheep habitat; considered in Alternative D; name changed from Handies Peak.	Relevance: Summer and winter range important to diversity of species; about 30 head in Bighorn A & B. Importance: Regionally and nationally significant habitat; fragile resources; disease could endanger herd, sensitive species using the habitat; known threat to values from grazing (domestic sheep).	4,762 BLM, in Alt. D; Included in Alpine ACEC, Alt. B.	Joe Capodice, BLM
11. Cebolla Creek: Bighorn Sheep Range; considered in Alternative D.	Relevance: Large herd of 80-100 animals use this area; used statewide to gather transplant animals. Disease in 1990 reduced herd to 10; could still support healthy herd. Importance: Regionally and nationally significant habitat; fragile resources; disease could endanger herd; sensitive species using habitat; known threat to values from grazing (domestic sheep).	9,812 BLM in Alternative D.	Joe Capodice, BLM

Table H-2

POTENTIAL AREAS OF CRITICAL ENVIRONMENTAL CONCERN
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NAME OF AREA AND VALUES	RELEVANCE AND IMPORTANCE	ACRES	NOMIN- ATED BY:
12. Slumgullion Earthflow: Mass wasting phenomenon; geologic, scenic values; considered in Alternatives D, E, and PRMP.	<p>Relevance: Significant earthflow; research and article subject; natural processes resulted in the damming of Lake Fork of the Gunnison River to form Lake San Cristobal, Colorado's second largest natural lake.</p> <p>Importance: NPS designated National Natural Landmark, October, 1965; BLM and Colorado Natural Area Program's Geologic Advisory Group (in existence from 1983 to 1988) recommended the area as a Research Natural Area (RNA); important geologic phenomenon; Nationally important; unstable soils; known threat to view shed from private land development.</p>	1,370 BLM in Alternative D; 1,407 BLM in Alternative E; included with Alpine Triangle ACEC in Alt. B.	CEC
13. Redcloud Peak: Snow willow vegetative community, habitat for USF&WS endangered invertebrate; considered in Alternatives D, E, and PRMP.	<p>Relevance: Habitat is significant in that it supports the largest of two known viable breeding populations of a listed species.</p> <p>Importance: Uncompahgre fritillary butterfly habitat; national importance regarding the existence of the species and research value; currently being researched and reported on; known threat to species and habitat from collectors and domestic sheep grazing.</p>	5,950 BLM in Alternative D; 5,947 BLM in Alternative E and PRMP; included with Alpine Triangle ACEC, Alt. B.	Joe Capodice, BLM; USF&WS
14. West Antelope Creek to Dillon Mesa: Critical big game winter range; eagle habitat; Red Creek and North Beaver Creek trout spawning streams; considered in Alternatives B, E, and PRMP; name shortened to West Antelope Creek.	<p>Relevance: Significant wildlife habitat (crucial big game winter range [elk, deer, bighorn sheep], bald eagles, trout spawning); includes Sapinero State Wildlife Area; essential for species diversity.</p> <p>Importance: Nationally important for hunting; fragile bald eagle wintering area; trout spawning streams essential for fishery within Blue Mesa Reservoir.</p>	29,060 BLM in Alternative B; 28,215 BLM in Alternative E and PRMP.	NPS

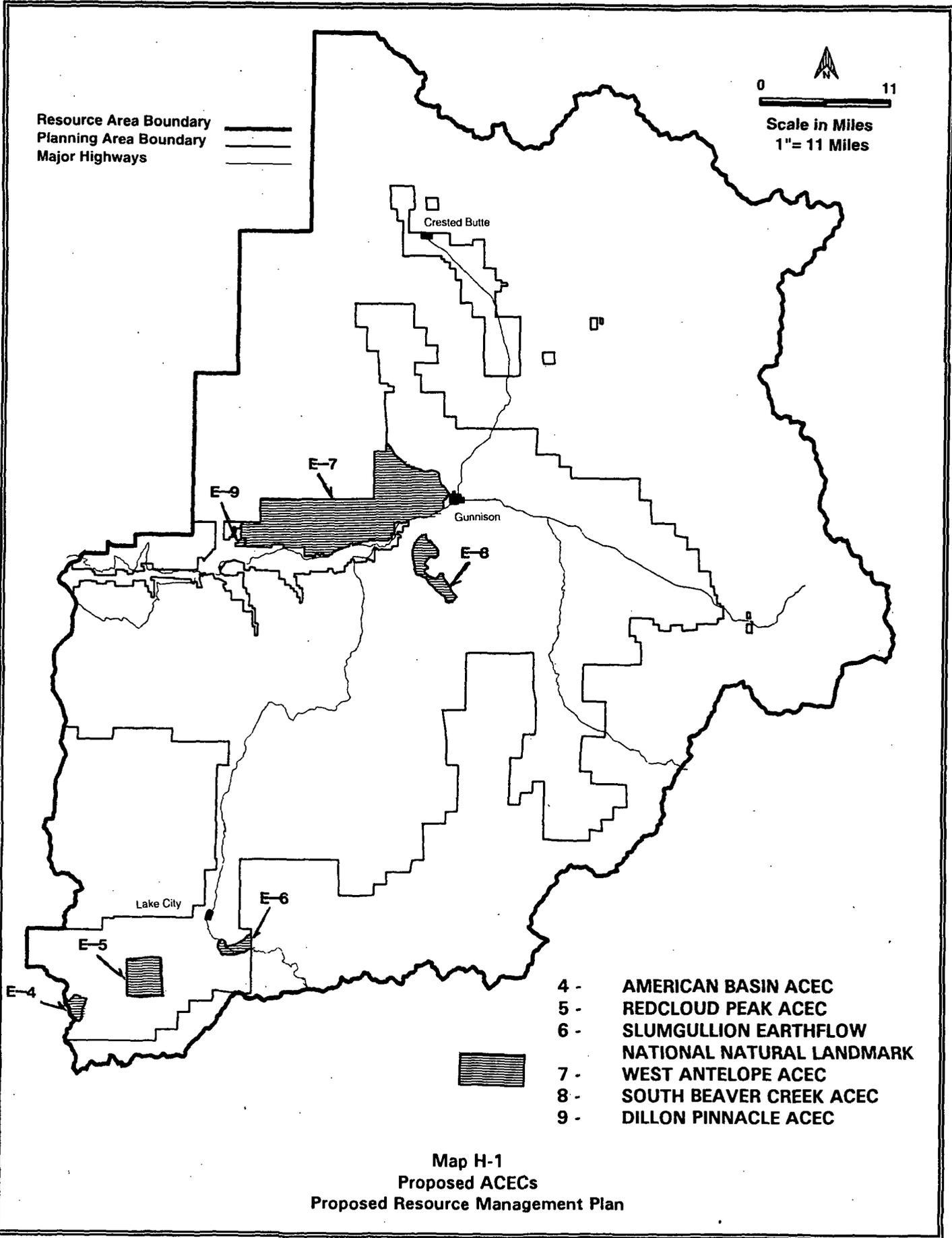
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Table H-2

POTENTIAL AREAS OF CRITICAL ENVIRONMENTAL CONCERN
 CONSIDERED IN ALTERNATIVES IN THE DRAFT
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 PROPOSED RESOURCE MANAGEMENT PLAN

NAME OF AREA AND VALUES	RELEVANCE AND IMPORTANCE	ACRES	NOMIN- ATED BY:
15. American Basin: Scenic and recreation values; considered in Alternative D, E, and PRMP.	<p>Relevance: Highly accessible; significant scenic values; heavily used hiking trails; large areas of striking wildflower displays.</p> <p>Importance: Nationally important destination for viewing wildflowers and high country scenery; fragile, exemplary mountain tundra; threatened by domestic sheep grazing; potentially threatened by mining and homesite development; important to hikers and motorists.</p>	1,577 BLM in Alternative D; 1,595 BLM in Alt. E and PRMP; also included with Alpine Triangle ACEC in Alt. B.	Arden Anderson, BLM
16. Loop Road: Scenic resources; combined with Alpine potential ACEC; considered in Alternative B.	<p>Relevance: Existing 2,318 acre protective scenic withdrawal; route through scenic, historical resources; designated National Backcountry Byway in San Juan Mountains.</p> <p>Importance: Nationally important and visited resource; National significance by designation as a "byway"; route traverses fragile historic mining period structures; is protected by a BLM scenic withdrawal; accesses developed recreation sites; promoted nationally by local 4-wheel rental firms, recognized and supported by Hinsdale and San Juan County Commissioners.</p>	2,318 BLM; Included in Alpine Triangle ACEC, Alt. B.	Arden Anderson, BLM

Note: ¹ CEC = Colorado Environmental Coalition



Resource Area Boundary
 Planning Area Boundary
 Major Highways

0 11
 Scale in Miles
 1" = 11 Miles

- 4 - AMERICAN BASIN ACEC
- 5 - REDCLOUD PEAK ACEC
- 6 - SLUMGULLION EARTHFLOW
NATIONAL NATURAL LANDMARK
- 7 - WEST ANTELOPE ACEC
- 8 - SOUTH BEAVER CREEK ACEC
- 9 - DILLON PINNACLE ACEC

Map H-1
 Proposed ACECs
 Proposed Resource Management Plan

APPENDIX I

**WILD AND SCENIC RIVER STUDY
ANALYSIS FOR THE
LAKE FORK OF THE GUNNISON RIVER
AND OTHER STREAMS IN THE
GUNNISON PLANNING AREA
March, 1991**

**U.S. Department of the Interior
Bureau of Land Management
Montrose District
Gunnison Resource Area**

APPENDIX I

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Wild and Scenic River Study Analysis for the Lake Fork of the Gunnison River and Other Streams in the Planning Area

INTRODUCTION

This analysis is a record of the Wild and Scenic River (W&SR) study process that is being conducted concurrently with the Gunnison Resource Management Plan (RMP). The report first appeared in the Draft Gunnison Resource Management Plan and Environmental Impact Statement (DRMP) published in March, 1991, with the title, Lake Fork of The Gunnison Wild And Scenic River Study Report. The title of this Appendix in the PRMP has been changed to more accurately describe the contents and the purpose served by the document. This study analysis, in addition to updating the former report on the Lake Fork of The Gunnison River for the Proposed Resource Management Plan (PRMP), includes documentation of BLM's eligibility determinations of all the other river and stream segments in the Planning Area. Please refer to Attachment 2 for this documentation. The only stream segment in the Planning Area found to be eligible for inclusion into the National Wild and Scenic Rivers System is the 13.3 mile Segment A of the Lake Fork of The Gunnison River, from Sloan Lake to Wager Gulch. The other streams or segments are not considered or studied in the process beyond the eligibility determination step, since they were determined not to be eligible.

The environmental analysis of impacts from "preliminary administrative recommendations for W&SR designation or non-designation" of eligible segments are discussed in Chapter Five of this PRMP.

SEGMENTS OF THE LAKE FORK OF THE GUNNISON RIVER

Because of the significant differences between various parts, the 57-mile long river was divided into three segments which will be evaluated separately. These are:

Segment A - Sloan Lake to Wager Gulch - 13.3 miles

Segment B - Wager Gulch to the Red Bridge Campground - 38.5 miles

Segment C - Red Bridge Campground to Blue Mesa Reservoir - 5.2 miles

DESCRIPTION AND LOCATION OF THE STUDY AREA

The headwaters of the Lake Fork of the Gunnison River (Lake Fork) are at Sloan Lake in the scenic American Basin at an elevation of 12,600 feet in the San Juan Mountains of southwest Colorado. From there the Lake Fork generally runs east to Lake San Cristobal then turns north, passing through Lake City and emptying into Blue Mesa Reservoir. The total river length is approximately 57 miles of which 36.2 miles (64.7%) is privately owned, 19.5 miles (33%) is managed by the Bureau of Land Management (BLM), 0.8 miles (1.3%) is managed by the National Park Service (NPS) and 0.5 miles (1%) is managed by the U.S. Forest Service. In an effort to evaluate portions of the stream with similar characteristics the river was broken into three segments. The river is located within the Alpine Triangle Special Recreation Management Area.

These segments with land ownership and mileage, are displayed in Table I-1 and I-2 and Maps I-1 through I-4.

Each segment was separately analyzed with respect to the various study criteria. Map I-1 shows the entire portion of the river studied. A river corridor of ¼ mile on each side of the stream was evaluated except in American Basin where the corridor was expanded to include the view shed of the basin.

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Table I-1

MILEAGE OF LAKE FORK OF GUNNISON RIVER STUDY SEGMENTS

RIVER SEGMENT	TOTAL MILES	BLM MILES/%	NPS MILES/%	FS MILES/%	PRIVATE MILES/%
A-Sloan Lake to Wager Gulch	13.3	10.6/80%	--	--	2.7/20%
B-Wager Gulch to Red Bridge	38.5	4.5/12%	--	0.5/1%	33.5/87%
C-Red Bridge to Blue Mesa	5.2	4.4/85%	0.8/15%	--	--

¹ NPS = National Park Service; FS = Forest Service

Table I-2

ACREAGE OF LAKE FORK OF GUNNISON RIVER STUDY SEGMENTS

RIVER SEGMENT	TOTAL ACRES	BLM ACRES/%	NPS ACRES/%	FS ACRES/%	PRIVATE ACRES/%
A-Sloan Lake to Wager Gulch	4,960	4,315/87%	--	--	645/13%
B-Wager Gulch to Red Bridge	10,940	2,467/22%	--	325/3%	8,147/75%
C-Red Bridge to Blue Mesa	1,525	1,325/88%	67/4%	--	132/8%

¹ NPS = National Park Service; FS = Forest Service

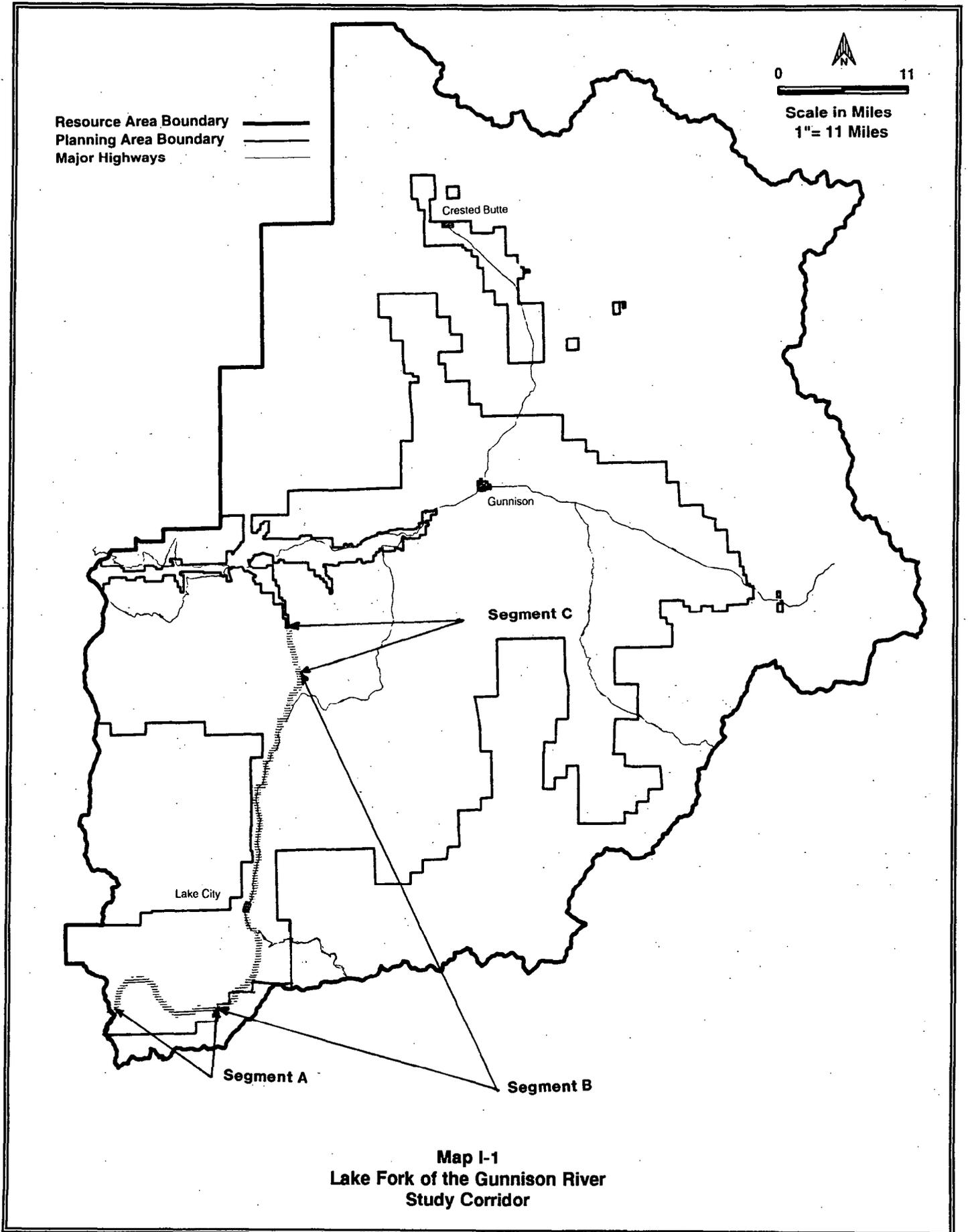
STUDY PROCESS

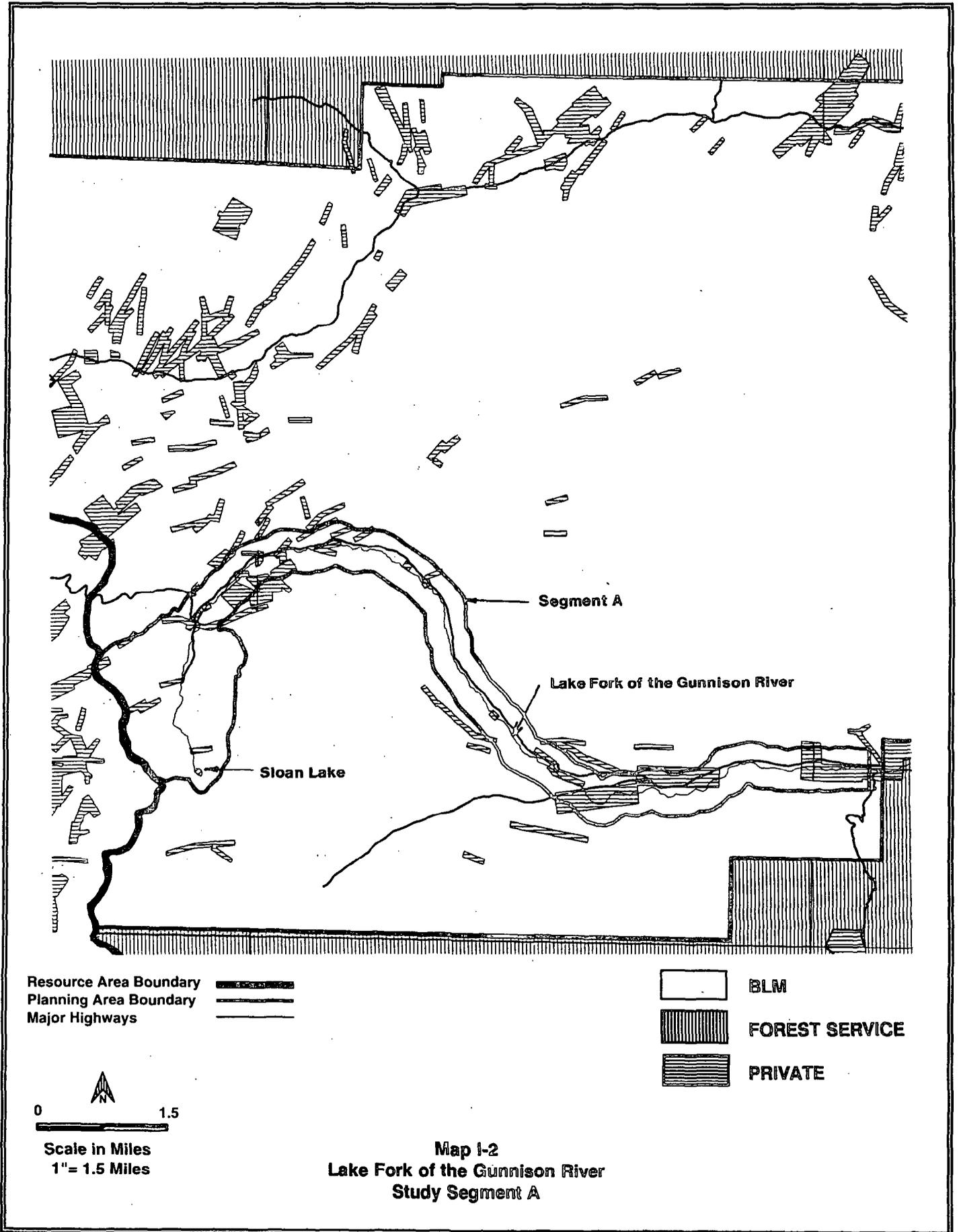
The wild and scenic river study process includes three steps:

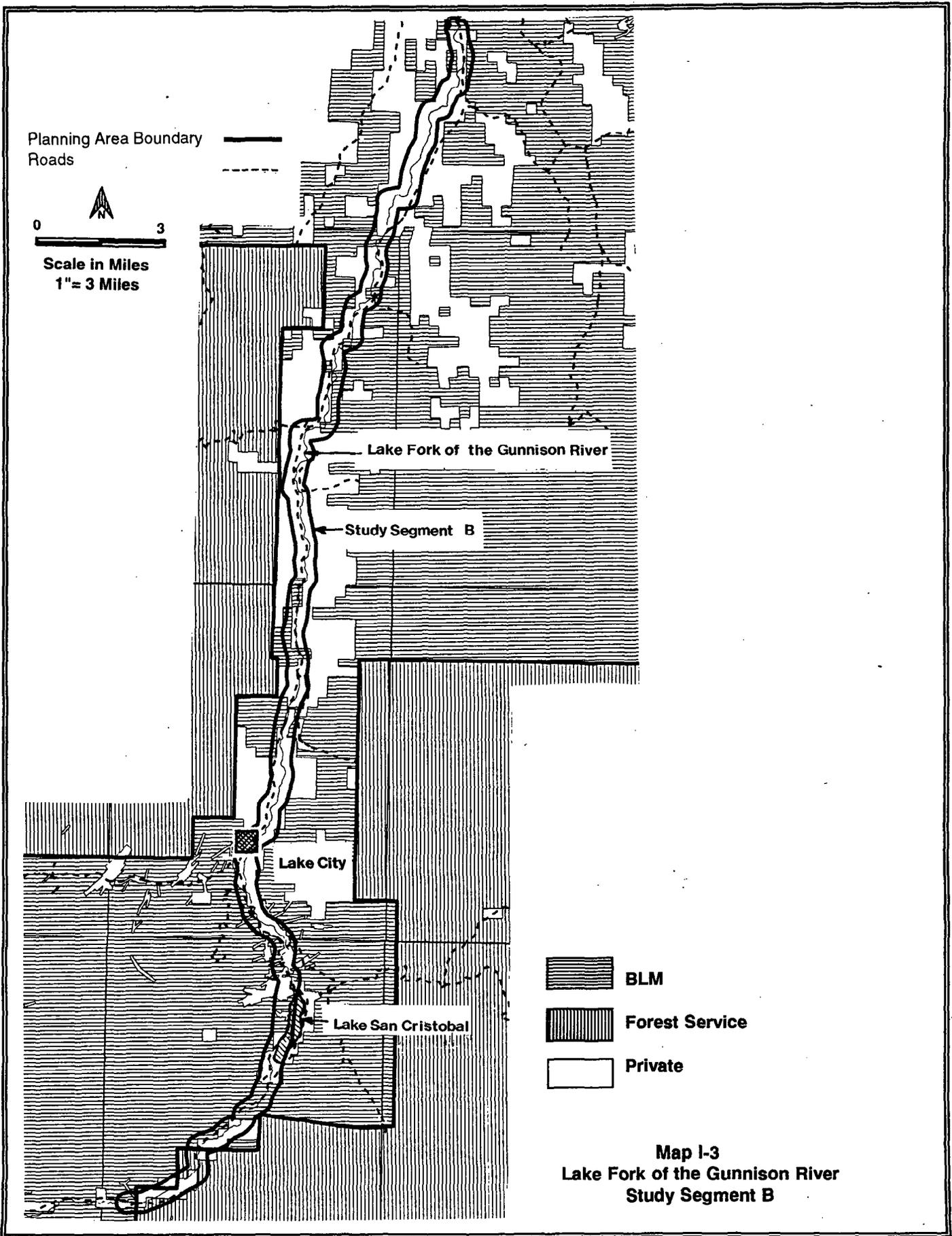
1. Determine if potential river segments are eligible for wild and scenic designation;
2. Determine the potential classification of the eligible segments as wild, scenic, recreation or any combination thereof; and
3. Conduct a suitability study to determine if the segment is suitable for inclusion into the Wild and Scenic Rivers System.

Study procedures are found in guidelines from the U.S. Departments of Interior and Agriculture National Wild and Scenic Rivers System; Guidelines for Eligibility, Classification and Management of River Areas (Federal Register Vol. 7 No 173, Sept.

7, 1982), and BLM's Guidelines For Fulfilling Requirements of The Wild and Scenic Rivers Act, August, 1988, and the draft update of this guidance. Based on this guidance, the study process has been, and will continue to be, conducted as a regular part of the BLM RMP process. The DRMP was published in March, 1991, for a 90-day period to permit the public to comment on all alternatives and recommended decisions, including preliminary designation and non-designation recommendations of the five alternatives in the draft RMP/EIS, and the study report published in the DRMP. These comments were analyzed and addressed as appropriate and included in this PRMP. This Appendix is a revised version of the study report published in the DRMP as Appendix I.

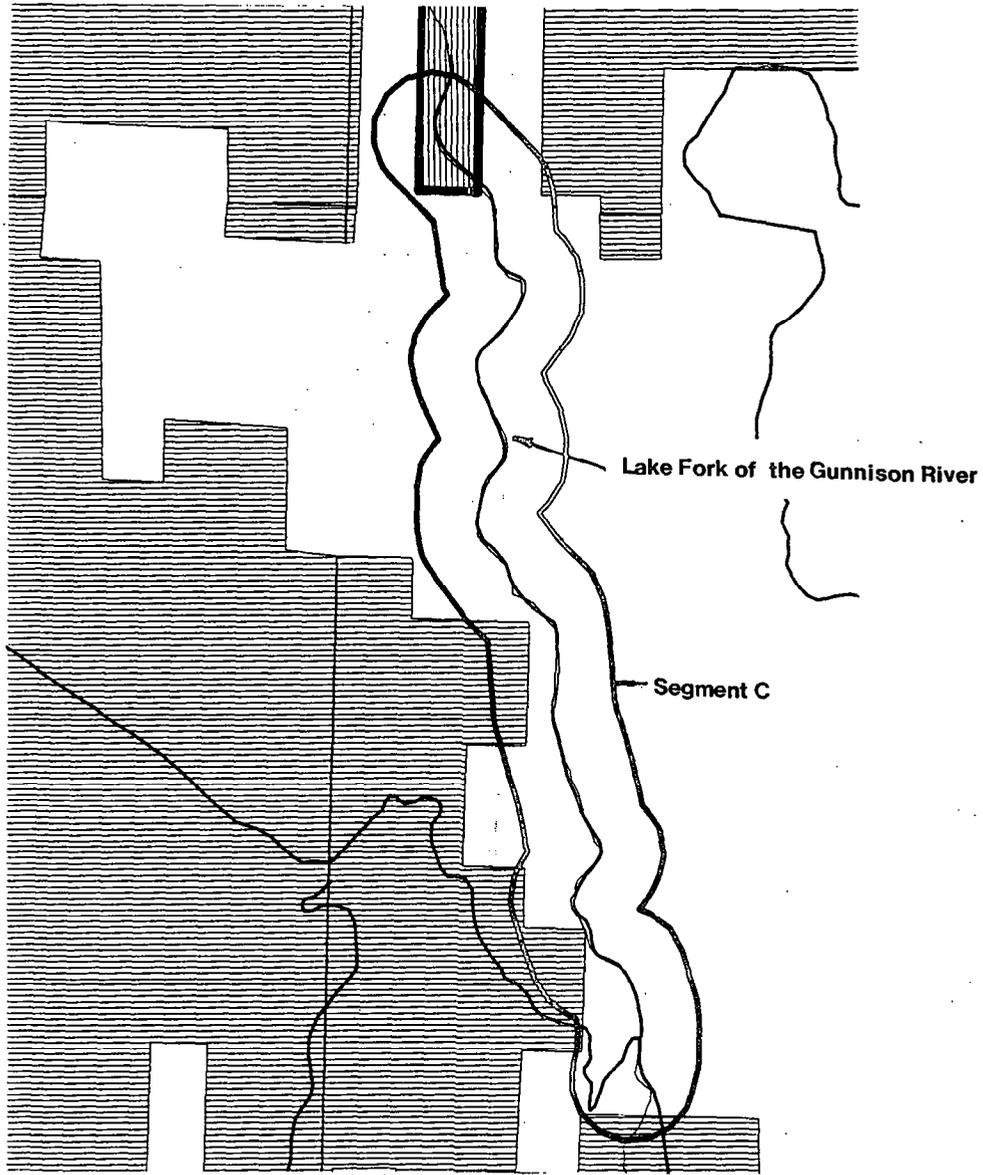






Planning Area Boundary 
Roads 


0  .8
Scale in Miles
1" = .8 Miles



-  BLM
-  National Park Service
-  Private

Map I-4
Lake Fork of the Gunnison River
Study Segment C

The PRMP contains one "alternative" and the environmental impacts of those management decisions. The PRMP will be published and distributed for a 30-day period in which proposed decisions can be protested, including those associated with this study analysis (determinations of eligibility, classification, and/or suitability or non-suitability).

After any protests received are resolved by the Director of the BLM, an approved Resource Management Plan/Record of Decision (RMP/ROD) will be published and made available. Once the RMP/ROD becomes effective, the BLM's role is determined by the designation or non-designation decision. If the decision does not recommend any segments as "suitable for designation" then the BLM's role is concluded. If a segment is found to be "suitable for designation" in the RMP/ROD, BLM could prepare a separate Study Report/ROD document, with an accompanying Legislative EIS that would consist of data extracted from the RMP/EIS documents. This package could be submitted to The Department of Interior for further recommendation. The BLM would develop an interim management plan to protect the outstanding features that qualify the river for inclusion. This plan would be followed for three years to give Congress an adequate opportunity to act on the BLM's recommendations.

An implementation process is then begun immediately after approval of the RMP for most decisions within the plan, including implementing interim management within eligible and suitable segments, if appropriate.

ELIGIBILITY, CLASSIFICATION AND SUITABILITY CRITERIA

To be eligible for inclusion in the national system, a study segment must be free-flowing, and the river and its adjacent land area must possess at least one outstandingly remarkable value. There are no specific requirements regarding the length or flow of an eligible river segment. Length and flow are sufficient if they sustain or complement the outstandingly remarkable values for which the river would be designated. The minimum study corridor includes the river and the adjacent lands to 0.25 mile from the riverbank. A wider corridor may be studied

if inclusion could facilitate improved management of resources in the river area. Segments determined to be non-eligible are not considered or studied further in the process.

A segment's potential classification depends on the condition of the river and adjacent lands as they exist at the time of the study. The Act specifies three classification categories for eligible rivers: wild, scenic, and recreational.

To be classified as wild, a river segment must be free of impoundments. The area must show little evidence of human activity and be generally inaccessible except by trail. The watersheds or shorelines must be primitive, with no structures or modifications of the river course. The water must be unpolluted.

To be classified as scenic, a river segment must be free of impoundments. The area must not show substantial evidence of human activity. It may be accessible by roads in places or have occasional bridges. The watershed or shoreline must be largely primitive and undeveloped.

To be classified as recreational, a river segment may have been impounded or diverted in the past if its appearance remains generally natural. It may be readily accessible by road or railway or be crossed by bridges. It may have some development along the shoreline or show substantial evidence of human activity.

Some factors to consider in the suitability determination include, but are not limited to:

1. Characteristics that do or do not make the area a worthy addition to the National Wild and Scenic Rivers System.
2. Current status of landownership, use in the area, including the amount of private land involved and associated or conflicting uses.
3. Reasonably foreseeable potential uses of the land and related waters, which would be enhanced, foreclosed, or curtailed if the area were included in the National Wild and Scenic Rivers System, and the values which could be foreclosed or

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diminished if the area is not protected as part of the system.

4. Public, State, local, or Federal interest in designation of the river, including the extent to which the administration of the river, including the costs thereof, may be shared by State, local, or other agencies and individuals.
5. Estimated cost of acquiring necessary lands and interests in lands and of administering the area if it is added to the system.
6. Ability of the agency to manage the river area or segment as a W & S river.
7. Historical or existing rights which would be adversely affected as to foreclose, extinguish, curtail, infringe, or constitute a taking that would entitle the owner to just compensation if the area were included in the National Wild and Scenic Rivers System. In the suitability analysis, adequate consideration will be given to rights held by owners, applicants, lessees, or claimants.
8. Other.

RELATIONSHIP OF WILD AND SCENIC RIVERS ACT TO PRIVATE LANDS

Land use controls on private lands are a matter of state and local zoning. Although the Wild and Scenic Rivers Act of 1968 includes provisions encouraging protection of river values through State and Federal land use planning, these provisions are not binding on local governments.

The Federal government is responsible for ensuring that management of designated rivers meets the intent of the act. In the absence of local or state river protection provisions, the Federal government could ensure protection through acquisition of private lands or interests in lands.

The Wild and Scenic Rivers Act specifically prohibits Federal use of condemnation in the fee title purchase of lands if 50 percent or more of the land within the boundary is already in public ownership. The BLM manages about 87% (4,315 acres) of the surface estate in Segment A. The act does provide the

Federal government with authority to purchase scenic, conservation, or access "easements" through condemnation proceedings, but this measure of last resort would be used only as necessary to remove a threat to the river.

The basic objective of wild and scenic river designation is to maintain the existing condition of the river. If a land use or development clearly threatens the outstandingly remarkable value, which resulted in designation of the river, efforts would be made to remove the threat through local zoning, land exchanges, purchases from willing sellers, and other actions except condemnation. Agriculture and grazing activities occurring at the time of designation would generally not be affected.

ANALYSIS OF ELIGIBILITY, CLASSIFICATION, AND SUITABILITY

Eligibility Determination

Segment A meets both criteria for eligibility. It is free flowing though some rip rapping has occurred. Some small diversions exist in Segment A to fill 6 lakes on private land within the study corridor. The river and associated study corridor within Segment A also possess outstandingly remarkable scenic values. This area is part of the BLM's Alpine Triangle Special Recreation Management Area which receives approximately 600,000 visitor days annually.

Much of this recreation use centers around the Alpine Loop National Backcountry Byway. This rough road parallels most of segment A within the study corridor. Most of this vehicle recreation is focused on the area's spectacular scenery. The river itself is important to recreation mainly to the extent it contributes to scenic beauty and diversity. Some fishing does occur in the lower portion from Sherman down to the Mill Creek Campground. No rafting, kayaking or other river dependent recreation occurs along this segment.

Segment B from Wager Gulch to the public land boundary south of the Red Bridge Campground was not found to be eligible for inclusion because it did not meet either criteria for eligibility. It is not free flowing. There are numerous diversions to fill streamside lakes. There is a large hydroelectric dam

and spillway near Lake City. The outlet of Lake San Cristobal has been artificially raised to maintain the level of the lake. The most recent work on the outlet structure was in the spring of 1990. There is significant riprap along much of the length, particularly along Highway 149 north of Lake City.

Extensive gabion structures on the Thomas property divert and channelize the river. This segment also lacks characteristics that could be considered outstandingly remarkable. No known threatened or endangered species exist within the study corridor in Segment B. The scenic values are good, but not outstanding and there are many man-made features such as roads, bridges, mines, gravel pits, houses and a small town within the corridor. Recreation values, which are mostly centered around fishing, are extremely limited due to the preponderance of private land in the segment (88% of the stream miles). The public has access only to small and isolated tracts of public land which tends to diminish the recreation experience. Conflicts between rafters and private landowners have resulted in the river in Segment B being closed to boater passage. There are some historical and cultural features along this segment but none are outstanding. There are no outstanding wildlife, geologic or other values that would qualify this segment as being eligible.

Segment C from the Red Bridge Campground to Blue Mesa Reservoir was also found to be ineligible for inclusion. It is more or less free flowing along the 5.2 miles of its length but extensive riprap has occurred along the railroad bed which later became a gravel road for vehicle traffic. This segment lacks values that are outstandingly remarkable. Scenic values are good but not significant or unusual in a regional or national context. Recreation values are good, primarily focused on fishing and rafting, but again not regionally significant. There are historic values in the form of remnants of temporary railroad camps used by workers who built the spur around 1890. These have been thoroughly inventoried by BLM and Park Service archaeologists and interpretive signs have been installed at several locations along the road. Still, these sites are not unique or particularly significant. The Canyon contains good breeding populations of brown and rainbow trout and a small herd of bighorn sheep. Otherwise there are no special fish or wildlife values and no threatened or

endangered species. In summary there are several attractive resource values in this segment, but none that could be considered outstandingly remarkable in a regional or national context.

Classification Determination

All eligible segments must be classified according to the category (wild, scenic, or recreational) that best fits each eligible segment. Classification is based on the degree of naturalness and the extent of development on the river and its adjacent lands as they exist at the time of the study.

Classifying an eligible segment as wild, scenic, or recreational does not segregate or withdraw the subject lands, but rather recommends or suggests the level of interim management for Federal land in the study area until a decision regarding designation is made, in the case of segments found "suitable for designation". If Congress designates a river or river segment, the segment would be managed according to how it is classified. Congress may classify a river segment at or below the highest level for which it qualifies. Specific management strategies may vary according to classification, but would be designed to protect and enhance the outstandingly remarkable values of the river area. These specific management strategies are formulated during development of the management plan, required within 3 full fiscal years of designation.

Since only Segment A of the Lake Fork was found to be eligible for study, only that segment was classified. The main criteria considered are impoundments, diversions, roads, bridges, shoreline development and evidence of human activity. The river segment was analyzed using these criteria.

Impoundments affect Segment A at Sloan Lake in the upper part of American Basin. The outlet of the lake has been artificially raised to impound more water than the natural outlet would allow. In Burrows Park, a diversion removes water to fill a small lake on private land. Another diversion downstream near Wager Gulch fills a moderately sized lake on private land.

Beginning at river mile 0.75, a road parallels the entire length of this segment. There is a wet, or

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low-water crossing of the river in American Basin. Bridges cross the river near Sherman and at the Mill Creek Campground. The road ranges from 20 to 1000 feet from the river but averages about 100 to 150 feet from the river throughout this segment.

Human activity and development are evident in many places along the river and throughout the corridor. These include a dozen mining exploration pits, at least seven major mine developments, about a dozen modern buildings and another dozen historic buildings. There is a 22-unit campground adjacent to the river and a potential recreational housing development with multiple homesites on the private land just east of Bent Creek.

Cumulatively, the above intrusions and disturbances diminish the natural and primitive nature of the river and the study corridor. Based on the above analysis, the recreational classification would be most appropriate for this segment.

Suitability Determination

This section of the study report contains a discussion of eight suitability factors in relationship to the 13.3 mile Segment A. These factors are contained in previously mentioned documents. The determination of suitability provides the basis to recommend designation or nondesignation of the river.

BLM's evaluation of Segment A regarding the eight suitability factors, and the determination of suitability or non-suitability for potential inclusion of Segment A into the National Wild and Scenic Rivers system follow:

1. Characteristics that do or do not make the area a worthy addition to the National Wild and Scenic Rivers System.

The outstandingly remarkable characteristic that qualifies this river segment as being eligible for inclusion is the superb scenery in this high mountain valley. The scenery is outstanding in the river corridor. Recreation use is moderate to heavy in the river corridor, but very little use is focused on the river itself. There is no recreational boating and no significant fishery resource associated with this segment.

The scenic values in this segment would continue to be well protected with the existing management authorities explained under suitability determination factor number 6. Therefore, this segment would not make a worthy addition to the National Wild and Scenic Rivers System.

2. Current status of landownership, use in the area, including the amount of private land involved and associated or conflicting uses.

Segment A contains approximately 4,960 acres of which 4,315 acres (87%) are federal land managed by the BLM. The remaining 645 acres (13%) are not public land. Non-federal mineral estate underlies 332 acres of federal surface. About 85% (3,668 acres) of the federal mineral estate has a high potential for the occurrence of locatable minerals while the remaining 15% has moderate potential. Much mineral exploration and exploitation has occurred within the segment, both on public and private land. That activity has ceased almost entirely. Approximately 3,300 acres in Segment A are contained in WSA's of which 2,357 acres have been recommended for designation as wilderness. Values on an additional 330 acres within the study segment are protected by the "Loop Road" scenic withdrawal along the Alpine Loop National Backcountry Byway. The BLM's Interim Management Policy for Lands under Wilderness Review, the proposed American Basin ACEC, and other special management attention within the segment restrict or constrain surface disturbance on the affected lands, and go a long way toward protecting the scenic and recreational values of the river and lands in the segment. These management situations do nothing to protect the integrity of the values in the segment on private lands. While there is little mining activity occurring on these lands, there is considerable activity in the construction of recreational homesites. If this segment is designated, the Bureau would hope to mitigate these impacts by purchasing private inholdings from willing sellers. In past years attempts to purchase inholdings in this area have been relatively unsuccessful. Landowners habitually expect to get more than fair market value for their land, which makes it difficult, if not impossible, to negotiate satisfactory arrangements. In addition, many of the properties already have houses developed on them. It is unlikely the government could afford

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to acquire these capital improvements only to tear them down to maintain the integrity of the segment. The segment is manageable without acquisition of private inholdings, but the integrity of the values would continue to decline in direct proportion to the amount of private land within it and development that occurs on that land.

3. Subject to valid existing rights, the reasonably foreseeable potential uses of the land and related waters, which would be enhanced, foreclosed, or curtailed if the area were included in the National Wild and Scenic Rivers system, and the values which could be foreclosed or diminished if the area is not protected as part of the system.

The potential development of the 3,992 acres of federal mineral estate in Segment A that are not withdrawn would not be precluded as a result of designation. Most discretionary actions would be curtailed or precluded, subject to valid existing rights or RMP decisions. Existing water rights would not be effected by designation of this "headwater" segment, since an objective of designation would be to maintain instream flows and a free-flowing condition of water in the river course. Acquisition of upstream water rights would not be considered in the case of designation.

It is not anticipated that any values would be diminished or foreclosed if the segment is not designated. Locatable mineral development is currently precluded in the segment within protective withdrawal C-0125423 (330 acres). Required compliance with BLM's 43 CFR 3802 regulations currently curtails locatable mineral development in the segment within 3,300 acres still subject to wilderness review in the Handies Peak and Red Cloud Peak WSAs. Existing legislation prohibits mineral leasing on the lands in WSA's. Discretionary actions are also curtailed in the lands under wilderness review as a result of necessary compliance with BLM's wilderness interim management policy. Discretionary actions in the entire segment are also curtailed by the requirement to meet mitigation and recreation management objectives in the Alpine Triangle SRMA Recreation Area Management Plan (RAMP). Special

management attention is also required for maintenance of scenic and recreation values along the Alpine Loop National Back Country Byway (11.05 miles in Segment A). Potential mineral leasing and locatable mineral activity would also be precluded on federal mineral estate in the proposed American Basin ACEC in Segment A (1,590 acres under federal surface). The ACEC designation and associated management objectives would emphasize special management attention for existing values.

4. Public, State, local, or Federal interest in designation of the river, including the extent to which the administration of the river, including the costs thereof, may be shared by State, local, and other agencies and individuals.

The BLM received numerous requests to recommend designation of the entire Lake Fork of the Gunnison River into the system. Several comments were received that supported the recommendation in the Preferred Alternative of the DRMP not to designate any portion of the stream. The BLM responses to these comments are located in Appendix P.

In about 1980 National River Inventory personnel looked at the Lake Fork as one unit. They found it had a fairly high number of points on their cultural development scoring sheet (4,158) but still could contain significant values. They chose to place the river in Category II which contains rivers that may have significant values but which did not receive the broad public support expressed for rivers on the NRI final list.

In 1980, the Colorado Division of Wildlife (CDOW) wrote a letter to BLM stating that the Lake Fork possessed outstandingly remarkable scenic, fishery and wildlife values.

In 1989, Lisa Stein of the University of Colorado Wilderness Study Group submitted a detailed report entitled "Proposal to Designate the Lake Fork of the Gunnison as a Wild and Scenic River". The group studied the entire river as a unit rather than in segments. The group's report did not analyze eligibility, but did discuss classification. Their recommendation was that the entire river was suitable for designation or inclusion with a classification of

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wild for the first 3/4 mile and recreational for the rest of the river. According to the cover letter, their recommendation was endorsed by the Colorado Environmental Coalition.

The Hinsdale County government has not officially expressed their opinion on, or reacted to a W&SR proposal. Their public opposition to further wilderness designations in Hinsdale County suggests they would not look favorably on another protective withdrawal that could accompany a W & SR designation. One major concern within the county is the small tax base resulting from the amount of public land (96%) in the county. Because there is so little private land on which taxes can be collected, there would undoubtedly be opposition to any attempts by the BLM to acquire private lands in the segment and remove them from the tax base whether developed or undeveloped.

There has been no interest expressed in assisting the BLM to carry out management of the river segment, although Hinsdale County has provided excellent assistance with the BLM's recreation goals for the Back Country Byway and the general area. The CDOW would want to continue their management efforts for cutthroat trout in Sloan Lake and the upper part of the drainage.

5. Estimated cost of acquiring necessary lands and interests in lands and of administering the area if it is added to the system.

The study segment could be managed as it is without acquiring private lands. The ability of BLM to maintain the integrity of resources in the segment would be enhanced by acquiring these inholdings. To acquire the lands and improvements necessary to place in federal ownership the W&SR values in Segment A would likely be prohibitively expensive. Approximately 645 acres of private land would be involved with an average cost of \$1000 to \$2000 per acre. There are about 8 habitable structures in the segment with values ranging from \$50,000 to \$200,000. Costs for purchasing fee title to land and improvements would probably exceed 2 million dollars. If BLM instead tried to purchase conservation easements or scenic easements the cost would be less but still prohibitive. If BLM opted not to acquire private inholdings, current trends suggest

that some changes would occur but values in the segment would not deteriorate drastically.

The cost of administering the area would be minimal because it is already part of the high priority Alpine Triangle SRMA. Since very little recreation use is focused on the river in Segment A there would be no need for additional facilities or access.

6. Ability of the agency to manage the river area or segment as a Wild and Scenic River.

Because of the current attention paid to recreation management in this general area, it would be relatively simple for the BLM to incorporate considerations to maintain or protect values within current management. These values are recognized and partly protected in other ways such as the "Loop Road" scenic withdrawal (C-0125423, 330 acres in Segment A), the Alpine Loop National Backcountry Byway (11.05 miles in Segment A), WSA interim management policy for Redcloud and Handies Peak WSA's, and the Alpine Triangle Special Recreation Management Area. The PRMP recognizes and manages for the recreation values in this area and focuses particular attention on protecting the outstanding scenery along about 2-1/4 miles of the headwaters of the segment in the proposed American Basin Area of Critical Environmental Concern (ACEC).

If designated, the management plan could incorporate cooperative agreements with private landowners regarding the management of values in the segment. This approach would be preferred in lieu of fee simple acquisition or the acquisition of easements. Some landowners could be willing participants while others would not.

7. Historical or existing rights which would be adversely affected as to foreclose, extinguish, curtail, infringe, or constitute a taking that would entitle the owner to just compensation if the area were included in the National Wild and Scenic Rivers System. In the suitability analysis, adequate consideration will be given to rights held by owners, applicants, lessees, or claimants.

No existing rights have been identified in the study segment that would be adversely affected as a result of designation. Existing private property rights would be completely unaffected. Land purchases, exchanges or easement acquisitions would be carried out only with willing sellers. Unpatented mining claims would predate W&SR designation and thus would remain valid as long as proper diligence and filing are kept up. No new mining claims would be allowed within the corridor.

Very few water rights are present in this segment, and none would be negatively affected by designation. The Colorado Water Conservation Board maintains a perpetual right for instream flow on the Lake Fork to maintain fisheries habitat. From Sloan Lake to Cottonwood Creek, flow is 18 cubic feet per second (CFS). From Cottonwood Creek to Henson Creek the reserved flow is 20 CFS from October through April and 35 CFS from May through September. This right has a priority date of 1980 which makes it the senior right on that part of the river. As a result, a protection of instream flow and associated river values is already in place. It is not likely that W&SR status would offer additional protection for this resource.

8. Other issues and concerns identified in the land-use planning process.

No other major issues or concerns have been identified in the land use planning process. It is possible that other issues or concerns would be identified during the public comment period for the draft RMP/EIS. Those comments and concerns will be taken into consideration, along with all the others that we receive, during preparation of the PRMP/Final EIS.

SUITABILITY DETERMINATION SUMMARY

Segment A was the only one of the three segments studied that was determined to be eligible for study. It was classified in a recreational category. This was the only segment for which a suitability determination was done. Compatibility of the existing situation with Federal designation, analysis of alternative management strategies and reasonably foreseeable potential effects of designation on the management and protection of the land and resources in the Upper

Lake Fork corridor were used to determine suitability of the river for inclusion in the National Wild and Scenic Rivers System.

About 87% of the land in the segment is managed by BLM. Activities on private land are expected to somewhat alter the natural setting of the corridor primarily through the development of recreational homesites. The cost of acquiring these private inholdings would be prohibitive and probably strongly opposed by local government due to the impact on the county's already small tax base.

The scenic values in the segment are currently afforded significant protection through the Loop Road scenic withdrawal, interim management protection in the Redcloud and Handies Peak Wilderness Study Areas, the Recreation Area Management Plan and the State of Colorado reservation of instream flows. Implementing the recommendations in the proposed American Basin ACEC would provide additional protection for the values. Designation as a Recreational component of the Wild and Scenic River system would not offer any significant improvement in the protection of this area's outstanding scenery.

For these reasons, BLM has determined that Segment A of the Lake Fork of the Gunnison River would not be a worthy addition to the system and is not suitable for inclusion in the National Wild and Scenic Rivers System.

INTERIM MANAGEMENT

The Segment A corridor of The Lake Fork of The Gunnison River will continue to be well protected by existing management of the Wilderness Study Areas, the Loop Road scenic withdrawal, the Alpine Loop National Backcountry Byway and the Recreation Area Management Plan for the Alpine Triangle SRMA.

The proposed ACEC at American Basin would provide additional protection of values in Segment A.

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Attachment 1

BLM GUIDELINES FOR WILD AND SCENIC RIVER DETERMINATION OF SUITABILITY

The following information is taken from the BLM's August 1988 Guidelines for Fulfilling Requirements of the Wild and Scenic Rivers Act of September 1968.

1. Determination of Suitability: The determination of suitability is the third step in the river assessment and evaluation process for section 5 (a) and 5 (d) rivers. This step provides the basis for the decision to recommend designation or nondesignation of an eligible river based on the resource alternatives studied in detail in the RMP, associated EIS, and related information developed during resource management planning.

a. RMP Preference: Where possible, it is advantageous to carry the river assessment through the suitability determination and make that decision in the RMP. If a suitability determination is deferred on those rivers where the BLM has primary responsibility, the RMP must prescribe the protection (interim management prescriptions) to be provided for the river and adjacent public land area pending the suitability recommendation and, when necessary, subsequent action by the Congress. In order to provide realistic interim management prescription, the RMP should document the classification category of the appropriate segment(s) (wild, scenic, and/or recreation), independent of the suitability or nonsuitability recommendation. The projected schedule for completing the study, recommendation concerning suitability, and other information will be set forth in the RMP also. (See VIII.B.s.).

b. Eligible Rivers: All eligible river segments are evaluated for suitability using the BLM resource management planning process (except where study is deferred or where a legislatively mandated study requires an

earlier deadline be met). Eligible W & S segments which are determined nonsuitable for designation, can be released from further study only by State Directors through the RMP record of decision. For suitable W & S rivers, a separate appendix to the RMP and EIS document is encouraged for ease in preparing the W & S river study report/record of decision to Congress. Where a suitability determination cannot be made in the RMP, a separate legislative final EIS will be required as part of a separate study reporting package (and plan amendment) to make that determination. Some factors to consider in the suitability determination include, but are not limited to:

1. Characteristics that do or do not make the area a worthy addition to the National Wild and Scenic Rivers System.
2. Current status of landownership, use in the area, including the amount of private land involved and associated or conflicting uses.
3. Reasonably foreseeable potential uses of the land and related waters, which would be enhanced, foreclosed, or curtailed if the area were included in the National Wild and Scenic Rivers system, and the values which could be foreclosed or diminished if the area is not protected as part of the system.
4. Public, State, local, or Federal interest in designation of the river, including the extent to which the administration of the river, including the costs thereof, may be shared by State, local, or other agencies and individuals.

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5. Estimated cost of acquiring necessary lands and interests in lands and of administering the area if it is added to the system.
6. Ability of the agency to manage the river area or segment as a W&S river.
7. Historical or existing rights which would be adversely affected as to foreclose, extinguish, curtail, infringe, or constitute a taking that would entitle the owner to just compensation if the area were included in the National Wild and Scenic Rivers System. In the suitability analysis, adequate consideration will be given to rights held by owners, applicants, lessees, or claimants.
8. Other

c. Noneligible Rivers

1. BLM 5 (d) W & S River Studies: Studies or rivers under this Section of the Act will be discontinued upon finding of noneligibility in the BLM resource

management planning process or subsequent W & S river study. In RMPs, the documentation supporting the eligibility assessment will normally be put in an appendix to either the RMP or associated EIS.

2. Legislatively Mandated Studies: If a section 5 (a) study river is found to be non eligible, the WSR river study report/record of decision should describe the basis for the noneligibility determination. The report should then be submitted to the Congress in accordance with section 7 (b) and the Secretary of the Interior shall publish a notice in the Federal Register 180 days after congressional notification that such a determination has been made. This notice should also include a reference to termination of related NEPA compliance action, thereby concurrently terminating activities for which a notice of intent had earlier been published.

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Attachment 2

Table I-3

ELIGIBILITY REQUIREMENTS OF OTHER STREAMS IN THE PLANNING AREA

STREAM NAME	MILES	TOTAL MILES ON BLM	OUTSTANDINGLY REMARKABLE FEATURES	FREE- FLOWING
Alder Creek	4.45	2.93	No	No
Alkali Creek	2.64	0.22	No	No
Alpine Gulch	4.82	4.05	No	Yes
Antelope Creek	4.66	0.43	No	No
Archuleta Creek	3.34	0.53	No	No
Bead Creek	1.87	0.90	No	Yes
Bear Creek	0.18	0.16	No	Yes
Beaver Creek	8.86	1.42	No	No
Bent Creek	3.01	3.01	No	No
Big Blue Creek	9.09	3.77	No	Yes
Big Buck Creek	2.26	1.30	No	No
Bill Hare Gulch	0.61	0.42	No	Yes
Blue Creek	3.50	1.77	No	No
Boulder Gulch	2.71	2.46	No	Yes
Burnt Creek	4.64	4.64	No	Yes
Camp Creek	1.14	1.08	No	Yes
Campbell Creek	1.14	1.08	No	Yes
Cataract Gulch	1.66	1.59	No	Yes
Cebolla Creek	41.87	7.63	No	No
Cherry Creek	1.58	0.18	No	Yes
Cleveland Gulch	2.04	1.74	No	Yes
Cochetopa Creek	42.41	8.38	No	No
Cooper Creek	3.51	3.40	No	Yes
Copper Gulch	2.00	2.00	No	Yes
Corral Creek	1.95	1.95	No	Yes
Cottonwood Creek	2.97	2.43	No	Yes
Cow Creek	0.81	0.80	No	Yes
Crystal Creek	0.60	0.37	No	Yes
Cuba Gulch	0.52	0.52	No	Yes
Curecanti Creek	2.99	0.02	No	No
Cutler Drive Creek	1.99	0.70	No	No
Deer Beaver Creek	2.26	1.25	No	Yes
Deldorado Creek	2.90	0.49	No	No
Devils Creek	4.49	3.25	No	No
Dry Creek	2.10	0.67	No	Yes
Dwyer Gulch	1.45	0.03	No	Yes

Attachment 2 (Cont'd)

Table I-3

ELIGIBILITY REQUIREMENTS OF OTHER STREAMS IN THE PLANNING AREA

STREAM NAME	MILES	TOTAL MILES ON BLM	OUTSTANDINGLY REMARKABLE FEATURES	FREE- FLOWING
East Fork Creek	2.19	1.09	No	Yes
Eaton Creek	1.65	0.06	No	Yes
East Beaver Creek	0.65	0.53	No	Yes
East Elk Creek	4.23	1.31	No	Yes
East Fork Alpine Gulch	1.78	1.78	No	Yes
East Fork Bent Creek	0.90	0.90	No	Yes
East Fork Williams Creek	1.55	1.55	No	Yes
East Fork Little Blue Creek	3.51	0.69	No	Yes
East Fork Little Cimarron Creek	3.51	1.34	No	Yes
East Fork Powderhorn Creek	11.50	11.50	No	Yes
Fish Canyon Creek	1.81	1.81	No	Yes
Fourth of July Creek	6.31	4.79	No	No
Friends Creek	2.75	1.77	No	Yes
Grizzly Gulch	2.10	2.10	No	No
Henson Creek	11.85	19.41	No	No
High Bridge Gulch	0.81	0.29	No	Yes
Homestead Gulch	1.59	0.94	No	No
Hot Springs Creek	5.38	0.93	No	No
Independence Gulch	0.53	0.12	No	Yes
Indian Creek	11.34	7.58	No	Yes
Larson Creek	1.60	0.71	No	Yes
Left Camp Creek	0.35	0.35	No	Yes
Lick Creek	2.56	0.27	No	No
Little Blue Creek	10.37	1.18	No	Yes
Little Mill Creek	0.40	0.39	No	Yes
Little Willow Creek	4.01	1.48	No	Yes
Los Pinos Creek	8.51	0.75	No	No
Middle Fork Alpine Gulch Creek	0.95	0.95	No	Yes
Middle Fork Powderhorn Creek	5.24	5.24	No	Yes
Middle Fork Blue Creek	7.98	0.85	No	Yes
Mill Creek	3.13	0.12	No	No
Mill Gulch	2.49	2.49	No	Yes
Moore Pasture Creek	0.88	0.03	No	Yes
North Fork Henson	1.73	1.70	No	Yes
Oh Be Joyful Creek	1.00	0.73	No	Yes
Owens Creek	0.35	0.25	No	Yes
Owl Gulch	0.79	0.79	No	Yes

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Attachment 2 (Cont'd)

Table I-3

ELIGIBILITY REQUIREMENTS OF OTHER STREAMS IN THE PLANNING AREA

STREAM NAME	MILES	TOTAL MILES ON BLM	OUTSTANDINGLY REMARKABLE FEATURES	FREE- FLOWING
Palmetto Gulch	1.66	0.93	No	Yes
Park Creek	7.97	3.96	No	Yes
Pauline Creek	2.42	1.43	No	Yes
Phelps Cabin Creek	1.24	1.24	No	Yes
Pine Creek	15.13	1.35	No	Yes
Pole Creek	3.02	3.02	No	Yes
Powderhorn Creek	5.85	1.64	No	Yes
Prosser Creek	2.26	1.53	No	No
Quartz Creek	8.21	0.13	No	No
Razor Creek	9.49	0.70	No	No
Red Creek	4.51	1.78	No	Yes
Redcloud Gulch	1.16	0.95	No	Yes
Red Mountain Gulch	1.89	1.47	No	Yes
Right Creek	4.27	2.19	No	Yes
Round Corral Creek	2.41	0.78	No	Yes
South Beaver Creek	20.85	7.75	No	No
Schaeffer Gulch	1.31	1.04	No	Yes
South Fork Silver Creek	1.23	1.23	No	Yes
Silver Creek	2.15	2.15	No	Yes
Skunk Creek	3.60	3.13	No	No
Slaughterhouse Gulch	1.66	1.26	No	Yes
Smelter Gulch	0.53	0.53	No	Yes
Snare Creek	3.28	3.28	No	Yes
Snelson Creek	0.79	0.02	No	Yes
Sparling Gulch	2.04	1.35	No	Yes
Spring Creek	1.41	0.54	No	Yes
Spring Gulch	1.35	0.46	No	Yes
Spring Hill Creek	0.99	0.99	No	Yes
Square Gulch	1.11	1.11	No	Yes
Steuben Creek	4.14	0.34	No	Yes
Stevens Creek	4.34	2.42	No	No
Sugar Creek	5.54	5.32	No	Yes
Sun Creek	1.82	0.45	No	Yes
T. Gulch	0.32	0.32	No	Yes
Timber Gulch	0.64	0.24	No	Yes
Tomichi Creek	61.41	0.67	No	No

Attachment 2 (Cont'd)

Table I-3

ELIGIBILITY REQUIREMENTS OF OTHER STREAMS IN THE PLANNING AREA

STREAM NAME	MILES	TOTAL MILES ON BLM	OUTSTANDINGLY REMARKABLE FEATURES	FREE- FLOWING
Townsite Gulch	1.06	0.52	No	Yes
Trout Creek	8.01	5.35	No	Yes
U Creek	10.62	5.60	No	Yes
Van Boxel Creek	5.54	3.89	No	Yes
Vantassel Gulch	5.29	1.55	No	Yes
Wade Gulch	2.48	2.28	No	Yes
Wager Gulch	1.19	1.05	No	Yes
West Antelope Creek	5.56	3.60	No	Yes
Water Gulch	1.07	0.36	No	Yes
West Fork Indian Creek	3.92	3.36	No	Yes
West Fork Cebolla Creek	0.63	0.63	No	Yes
West Fork Middle Blue Creek	3.92	1.85	No	Yes
West Fork Dry Creek	2.28	1.12	No	Yes
West Fork Powderhorn Creek	9.13	8.96	No	Yes
Wildcat Creek	1.74	0.64	No	Yes
Wildhorse Creek	1.25	1.24	No	Yes
Williams Creek	1.67	1.67	No	Yes
Willow Creek	36.56	13.17	No	Yes
Wolf Creek	5.32	4.79	No	No
Wood Gulch	2.16	2.13	No	Yes
West Pass Creek	4.91	0.96	No	Yes

APPENDIX J

SPECIAL STATUS PLANT AND ANIMAL SPECIES AND HABITAT

FEDERAL STATUS CATEGORIES FOR TAXA BEING CONSIDERED FOR ADDITION TO THE LIST OF ENDANGERED AND THREATENED WILDLIFE

The Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*) requires determination of whether species of wildlife and plants are endangered or threatened based on the best available scientific and commercial data. For many years, the U.S. Fish and Wildlife Service has been gathering data on taxa of animals (fishes, amphibians, reptiles, birds, mammals, sponges, crustaceans, arachnids, insects, snails and bivalve mollusks), native to the United States that have appeared at least at times, to merit consideration for addition to the List of Endangered and Threatened Wildlife. These taxa are assigned to one of the three categories described below. Unless it is the subject of a current published proposed or final rule determining endangered or threatened status, none of these taxa receives substantive or procedural protection pursuant to the Act (those species that are the subject of a proposed or final rule are removed from this list at each periodic updating).

1. Taxa for which the Service currently has substantial information on hand to support proposals to list them as endangered or threatened species. Also included in category 1 are taxa of known vulnerable status in the recent past that may already have become extinct. These plants retain a high priority for addition to the List, if extant populations are confirmed.

2. Taxa for which information, now in the possession of the Service, indicates that proposing to list as endangered or threatened is possibly inappropriate, but for which conclusive data on biological vulnerability and threat are not currently available to support proposed rules. Further biological research and field study usually will be necessary to ascertain the status of taxa in category 2, and it is likely that some category 2 candidates will not warrant listing.

3. Taxa that once were being considered for listing as threatened or endangered but are no longer under such consideration. Such taxa are further divided into three subcategories:

3A. Taxa for which the Service has persuasive evidence of extinction. If rediscovered, such taxa might acquire high priority for listing.

3B. Names that, on the basis of current taxonomic understanding, usually as represented in published revisions and monographs, do not represent taxa meeting the Act's legal definition of "species". Included also are vertebrate populations that do not meet this definition. Such supposed taxa could be reevaluated in the future on the basis of new information.

3C. Taxa that have proven to be more abundant or widespread than previously thought. If further research indicates a significant numerical or distributional decline in any of these taxa, or if any of the taxa are under a substantial threat, they may be reevaluated for transfer to categories 1 or 2.

BLM SENSITIVE SPECIES

Sensitive species are those designated by a State Director, usually in cooperation with the State agency responsible for managing the species, as sensitive. They are those species that are: (1) under status review by the USF&WS; or (2) whose numbers are declining so rapidly that Federal listing may become necessary; or (3) with typically small and widely dispersed populations; or (4) those inhabiting ecological refugia or other specialized or unique habitats. If sensitive species are designated by a State Director, the protection provided by the policy for USF&WS candidate species shall be used as the minimum level of protection.

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STATE OF COLORADO PLANT SPECIES OF SPECIAL CONCERN

The "State Concern" status in Table 2-13 refers to a list of plant species maintained by the Colorado Natural Areas Program, Division of Parks and Outdoor Recreation. The species on this list are divided into four categories and are defined as follows:

List 1 - Federal threatened or endangered plant species and species that are rare throughout their range, including a number of species which only occur in Colorado; plant species presumed extinct;

List 2 - Plant species presumed extirpated from Colorado; plant species which are rare in Colorado but relatively common elsewhere within their range;

List 3 - Plant species which appear to be rare but for which conclusive information is lacking;

List 4 - Plants of limited distribution or special interest which appear secure at this time.

State laws protecting these species apply to all BLM programs and actions to the extent that they are consistent with FLPMA and other Federal laws. In states where state government has designated species in categories that imply local rarity, endangerment, extirpation, or extinction, the State Director develops policies that will assist the state in achieving management objectives for those species on the various lists above.

APPENDIX K

OIL AND GAS STIPULATIONS

The following stipulations would be added, as prescribed in the various Management Unit prescriptions in this Proposed Resource Management Plan, to future oil and gas leases on both Federal surface and split-estate lands. The actual wording of these stipulations may be adjusted at the time of leasing to reflect future legislation, court decisions, or policy changes; however, the protection standards in these stipulations would be maintained. Any change to the protection content of the stipulation would require an amendment to the RMP/EIS. Table K-1 is a summary of the stipulations.

TABLE K-1

SUMMARY OF FEDERAL OIL AND GAS STIPULATIONS
BY TYPE, MANAGEMENT UNIT, AND ACRES EFFECTED
IN THE PROPOSED RESOURCE MANAGEMENT PLAN

MGT. UNIT	TIMING LIMITATIONS ¹	NO SURFACE OCCUPANCY ²						CONTROLLED SURFACE USE ³		TOTALS BY UNIT
	4-16/6-30 Elk- Calving Areas	Alpine Triangle Special Recreation Mgt. Area	Cochetopa Canyon Special Recreation Mgt. Area	Areas of Critical Environmental Concern	Bighorn Sheep Habitat	Sage Grouse Leks	Forest Service Admin. Sites	Areas of Critical Environmental Concern	Riparian Wetland Vegetation	
1		675								675
3			2,592							2,592
4				1,590 - American Basin - Scenery						1,590
5								5,962 - Redcloud Peak - Special Status Sp.		5,962
6				1,442 - Slumgullion Earthflow - Mudslide						1,442
7	154									280
8								4,540 - S. Beaver Creek - Special Status Sp.		4,540
9				552 - Dillon Pinnacles - Scenery						552
10					15,407					15,407
11						1,134				1,134
12	235					882			164	1,281
13	1,722					882				2,604
14						126			2,500	2,626
15	247	445								692
16	9,465					252	100			9,817
TOTALS	11,823	1,120	2,592	3,584	15,407	3,402	100	10,502	2,664	51,194

Notes: ¹ Total Acres Timing Limitations = 11,823² Total Acres No-Surface Occupancy = 26,205³ Total Acres Controlled Surface Use = 13,166

OIL AND GAS STIPULATIONS FOR THE PROPOSED RESOURCE MANAGEMENT PLAN

NO SURFACE OCCUPANCY STIPULATIONS

Alpine Loop National Back Country Byway, in Management Unit 1; G-1

No surface occupancy or use is allowed on the lands described below:

For the purpose of: Protecting the Primitive, Semi-Primitive Non-Motorized, Semi-Primitive Motorized and Roaded Natural recreation and scenic values along the Alpine Loop National Back Country Byway, within the Alpine Triangle Special Recreation Management Area (SRMA); Gunnison Resource Management Plan (Page).

Any changes to this stipulation will be made in accordance with the land use plan and/or the regulatory provisions for such changes (For guidance on the use of this stipulation, see BLM Manuals 1624 and 3101, and Forest Service Manuals 1950 and 2820).

Cochetopa Canyon SRMA, Management Unit 3; G-2

No surface occupancy or use is allowed on the lands described below:

For the purpose of: Protecting the Roaded Natural recreation and scenic values within the Cochetopa Canyon Special Recreation Management Area (SRMA); Gunnison Resource Management Plan (Page).

Any changes to this stipulation will be made in accordance with the land use plan and/or the regulatory provisions for such changes (For guidance on the use of this stipulation, see BLM Manuals 1624 and 3101, and Forest Service Manuals 1950 and 2820).

American Basin Proposed ACEC, Management Unit 4; G-3

No surface occupancy or use is allowed on the lands described below:

For the purpose of: protecting scenic and other natural resources and existing related recreation opportunities in the American Basin Area of Critical Environmental Concern (ACEC); Gunnison Resource Management Plan (Page).

Any changes to this stipulation will be made in accordance with the land use plan and/or the regulatory provisions for such changes (For guidance on the use of this stipulation, see BLM Manuals 1624 and 3101, and Forest Service Manuals 1950 and 2820).

Slumgullion Earthflow National Natural Landmark Proposed ACEC, Management Unit 6; G-4

No surface occupancy or use is allowed on the lands described below:

For the purpose of: protecting the geological mass-wasting phenomenon in the Slumgullion Earthflow National Natural Landmark Area of Critical Environmental Concern (ACEC); Gunnison Resource Management Plan (Page).

Any changes to this stipulation will be made in accordance with the land use plan and/or the regulatory provisions for such changes (For guidance on the use of this stipulation, see BLM Manuals 1624 and 3101, and Forest Service Manuals 1950 and 2820).

Dillon Pinnacles Proposed ACEC, Management Unit 9; G-5

No surface occupancy or use is allowed on the lands described below:

For the purpose of: protecting scenic and other natural resources and existing related recreation opportunities in the Dillon Pinnacles Area of Critical Environmental Concern (ACEC); Gunnison Resource Management Plan (Page).

Any changes to this stipulation will be made in accordance with the land use plan and/or the

regulatory provisions for such changes (For guidance on the use of this stipulation, see BLM Manuals 1624 and 3101, and Forest Service Manuals 1950 and 2820).

Rocky Mountain Bighorn Sheep Habitat, Management Unit 10; G-6

No surface occupancy or use is allowed on the lands described below:

For the purpose of: protecting bighorn sheep and their habitat selected because of topography, slope, aspect, and escape cover from disturbances that would alter the productivity or suitability of these areas as important bighorn sheep range; Gunnison Resource Management Plan (Page).

An exception to this stipulation may be approved if it can be demonstrated to the satisfaction of the Authorized Officer that the bighorn sheep range is (1) not being utilized and is expected to remain in such condition because of a temporary change in climate and/or habitat, and (2) operations can be conducted in such a manner as to avoid altering vegetation, topography, slope, aspect, and escape cover on these lands.

Any changes to this stipulation will be made in accordance with the land use plan and/or the regulatory provisions for such changes (For guidance on the use of this stipulation, see BLM Manuals 1624 and 3101, and Forest Service Manuals 1950 and 2820).

Sage Grouse Lek/Courtship sites; CO-2

No surface occupancy or use is allowed within a one-quarter mile radius of sage grouse lek sites/courtship sites. Known lek sites are described or identified below:

For the purpose of protecting grouse courtship sites from disturbances that would force strutting sage grouse onto less desirable sites, or disturbances that would interfere with mating processes, or disturbances that could result in lek site destruction.

An exception may be granted by the Authorizing Officer, dependant upon the active status of the leks or the geographical relationship of topographical barriers and vegetation screening to the site.

Any changes to this stipulation will be made in accordance with the land use plan and/or the regulatory provisions for such changes (For guidance on the use of this stipulation, see BLM Manuals 1624 and 3101, and Forest Service Manuals 1950 and 2820).

TIMING LIMITATION STIPULATIONS

Elk-Calving Areas; CO-10

No surface use is allowed during the following time period(s). This stipulation does not apply to operation and maintenance of production facilities.

April 16 through June 30

On the lands described below:

For the purpose of protecting elk-calving areas from activities which would force elk into less suitable areas during the calving season; Gunnison Resource Management Plan (Pages).

An exception to this stipulation, in the form of an alteration or removal, may be approved by the Authorizing Officer when it has been determined through a site specific analysis that specific actions would not interfere with critical habitat function or compromise animal condition within the project vicinity.

Any changes to this stipulation will be made in accordance with the land use plan and/or the regulatory provisions for such changes (For guidance on the use of this stipulation, see BLM Manuals 1624 and 3101, and Forest Service Manuals 1950 and 2820).

APPENDIXES

CONTROLLED SURFACE USE STIPULATION

Riparian/Wetland vegetation in Sage Grouse Brood Rearing Habitat; CO-28

Activities associated with oil and gas exploration and development including roads, transmission lines, storage facilities, are restricted to an area beyond the riparian/wetland vegetation zone on the lands described below:

For the protection of perennial water impoundments and streams, and/or riparian/wetland vegetation zone, important sage grouse brood-rearing habitat, and fish use, water quality, and other related resource values; Gunnison Resource Management Plan (Page).

Exceptions: This stipulation may be excepted subject to an on-site impact analysis with consideration given to degree of slope, soils, importance to the amount and type of wildlife and fish use, water quality, and other related resource values.

This stipulation will not be applied when the Authorized Officer determines that relocation up to 200 meters can be applied to protect the riparian system during location of the well site.

Any changes to this stipulation will be made in accordance with the land use plan and/or the regulatory provisions for such changes (For guidance on the use of this stipulation, see BLM Manuals 1624 and 3101, and Forest Service Manuals 1950 and 2820).

Riparian/Wetland vegetation along a Portion of Cebolla Creek; CO-28

Activities associated with oil and gas exploration and development including roads, transmission lines, storage facilities, are restricted to an area beyond the riparian/wetland vegetation zone along a portion of Cebolla Creek on the lands described below:

To protect perennial water impoundments and streams, and/or riparian/wetland vegetation and fish use, water quality, and other related resource values; Gunnison Resource Management Plan (Page).

Exceptions: This stipulation may be excepted subject to an on-site impact analysis with consideration given to degree of slope, soils, importance to the amount and type of wildlife and fish use, water quality, and other related resource values.

This stipulation will not be applied when the Authorized Officer determines that relocation up to 200 meters can be applied to protect the riparian system during location of the well site.

Any changes to this stipulation will be made in accordance with the land use plan and/or the regulatory provisions for such changes (For guidance on the use of this stipulation, see BLM Manuals 1624 and 3101, and Forest Service Manuals 1950 and 2820).

Redcloud Peak Proposed ACEC, Management Unit 5; G-7

Surface occupancy or use is subject to the following special constraints:

1. An inventory for populations of USF&WS listed threatened, endangered, candidate, and BLM sensitive species, especially the endangered Uncompahgre fritillary butterfly, and known or potential vegetative habitat of the species, would be conducted prior to approval of operations. The inventory would be used to prepare mitigative measures, consistent with lease rights granted, to reduce the impacts of surface disturbance to these special status species.

2. Relocation of proposed operations more than the 200 meters permitted in standard lease terms, in order to protect high value scenic resources. Mitigative measures would be prepared, consistent with lease rights granted, to reduce the impacts of surface disturbance to scenic resources.

Mitigation measures for the above two constraints may include, but are not limited to, relocation of roads, pads, pipelines, and other facilities, and fencing operations or habitat.

On the lands described below:

For the purpose of protecting USF&WS listed and candidate species and BLM sensitive special status

species and their known or potential habitat, especially known or potential habitat of the endangered Uncompahgre fritillary butterfly, and high value scenic resources within the Redcloud Peak Area of Critical Environmental Concern (ACEC) or on the lands described above; Gunnison Resource Management Plan (Page).

Any changes to this stipulation will be made in accordance with the land use plan and/or the regulatory provisions for such changes (For guidance on the use of this stipulation, see BLM Manuals 1624 and 3101, and Forest Service Manuals 1950 and 2820).

South Beaver Creek Proposed ACEC, Management Unit 8; G-8

Surface occupancy or use is subject to the following special constraints:

1. An inventory for populations of USF&WS listed threatened, endangered, candidate, and BLM sensitive species, especially for skiff milkvetch, including known or potential habitat of the species, would be conducted prior to approval of operations. The inventory would be used to prepare mitigative measures, consistent with lease rights granted, to reduce the impacts of surface disturbance to these special status plant species.
2. Relocation of proposed operations more than the 200 meters permitted in standard lease terms, in order to protect special status plant species. Mitigative measures would be prepared, consistent with lease rights granted, to reduce the impacts of surface disturbance to special status plant species.

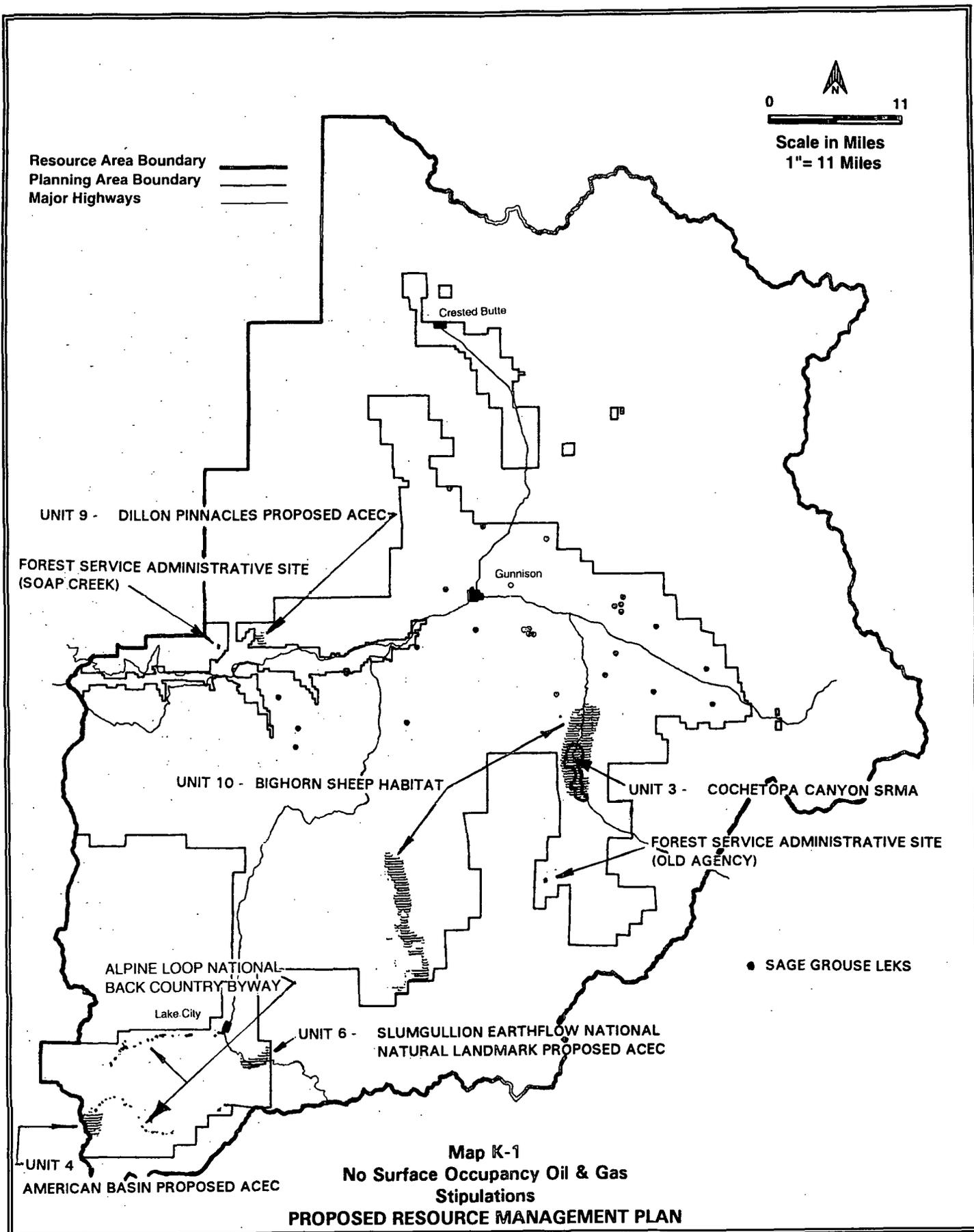
Mitigation measures for the above constraints may include, but are not limited to, relocation of roads, pads, pipelines, and other facilities, and fencing operations or habitat.

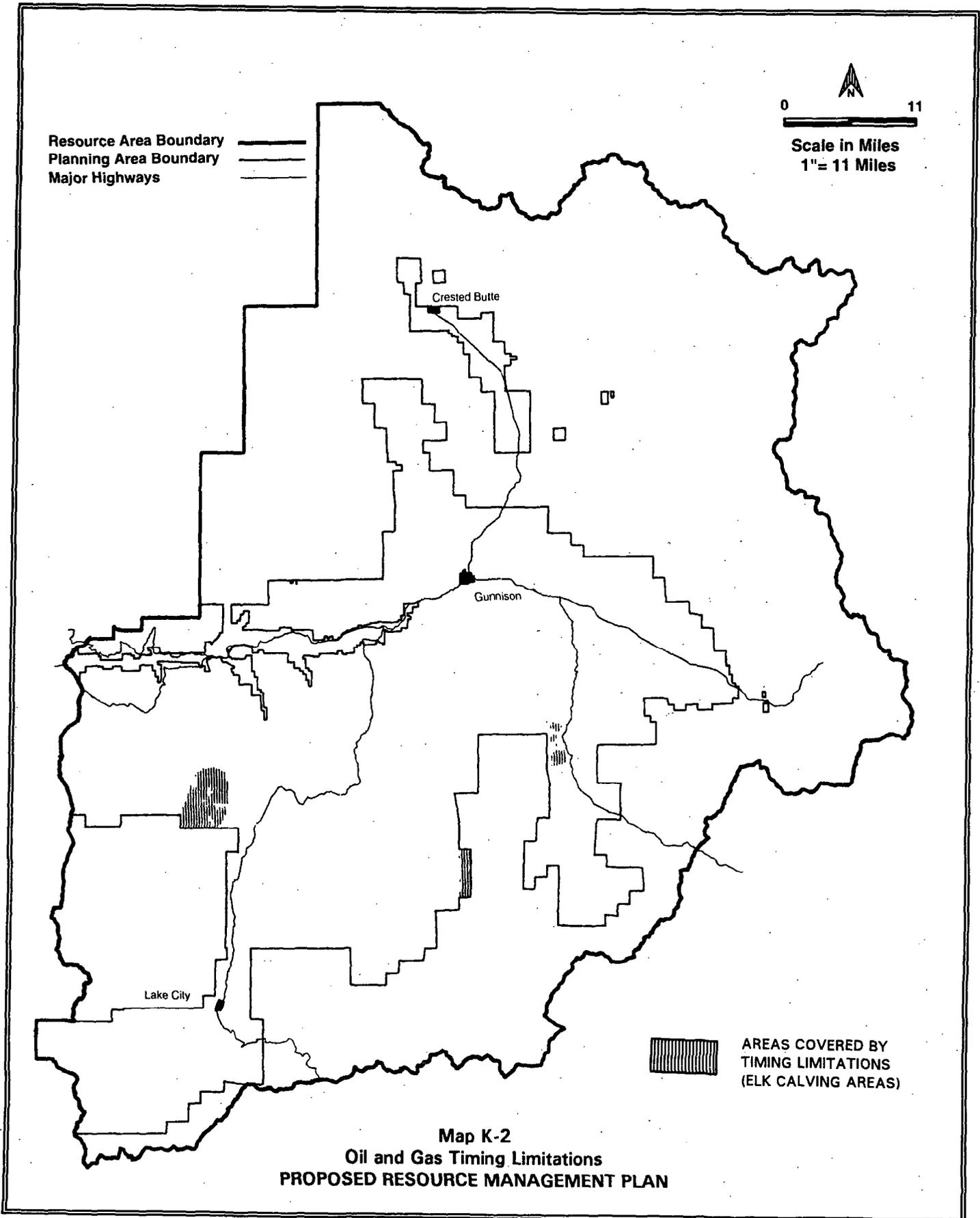
On the lands described below:

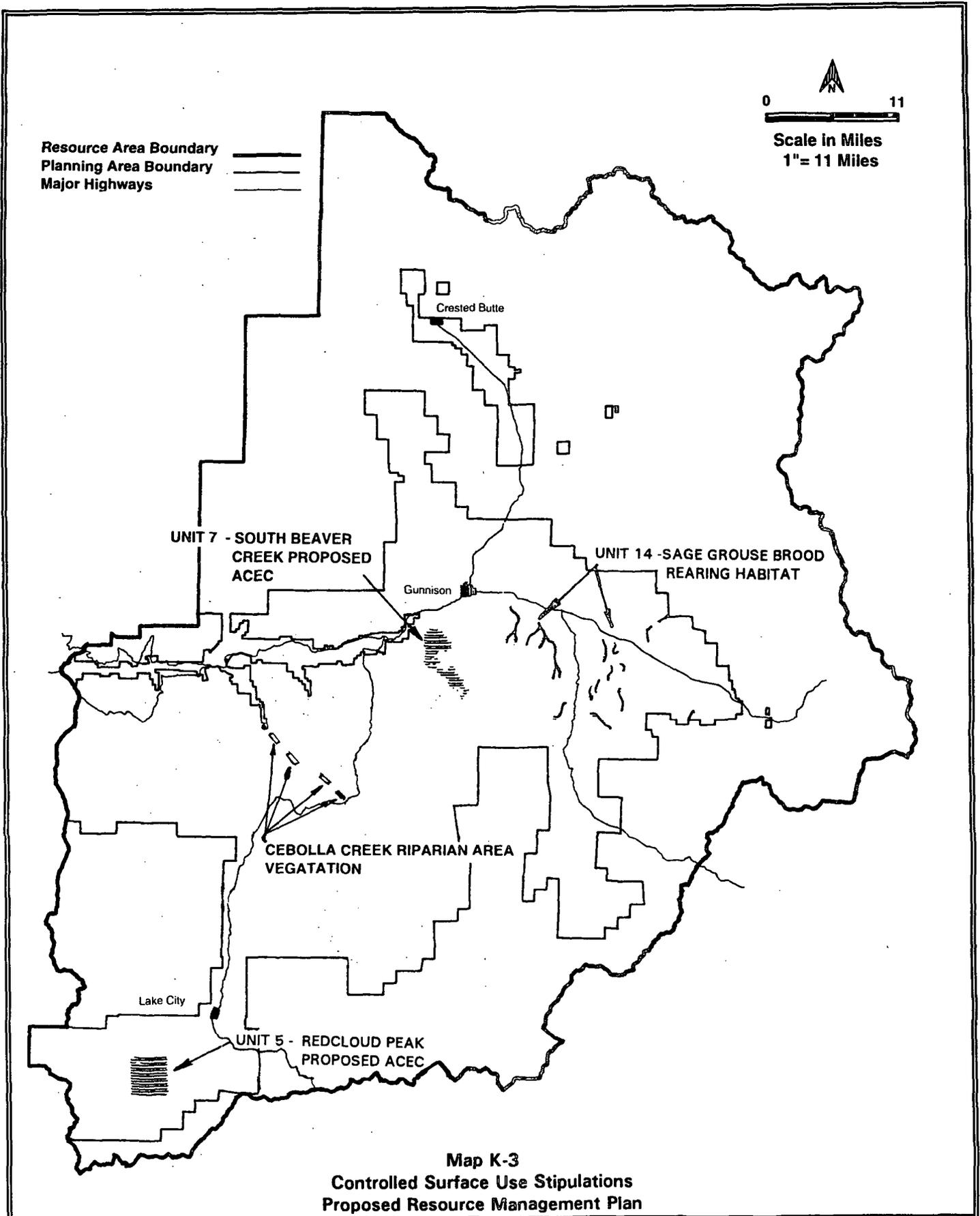
For the purpose of protecting USF&WS listed and candidate species and BLM sensitive special status species and their known or potential habitat, especially known or potential habitat of skiff milkvetch, within the South Beaver Creek Area of Critical Environmental Concern (ACEC); Gunnison Resource Management Plan (Page).

An exception or alteration to the area covered by this stipulation may be approved if it can be demonstrated to the satisfaction of the Authorizing Officer that, after an impact analysis is conducted that considers such factors as the type and amount of surface disturbance proposed, plant frequency and density, and the relocation of disturbances, operations can be conducted without causing unacceptable impacts on USF&WS listed threatened, endangered, candidate, or BLM sensitive listed special status plant species or their occupied or potential habitat.

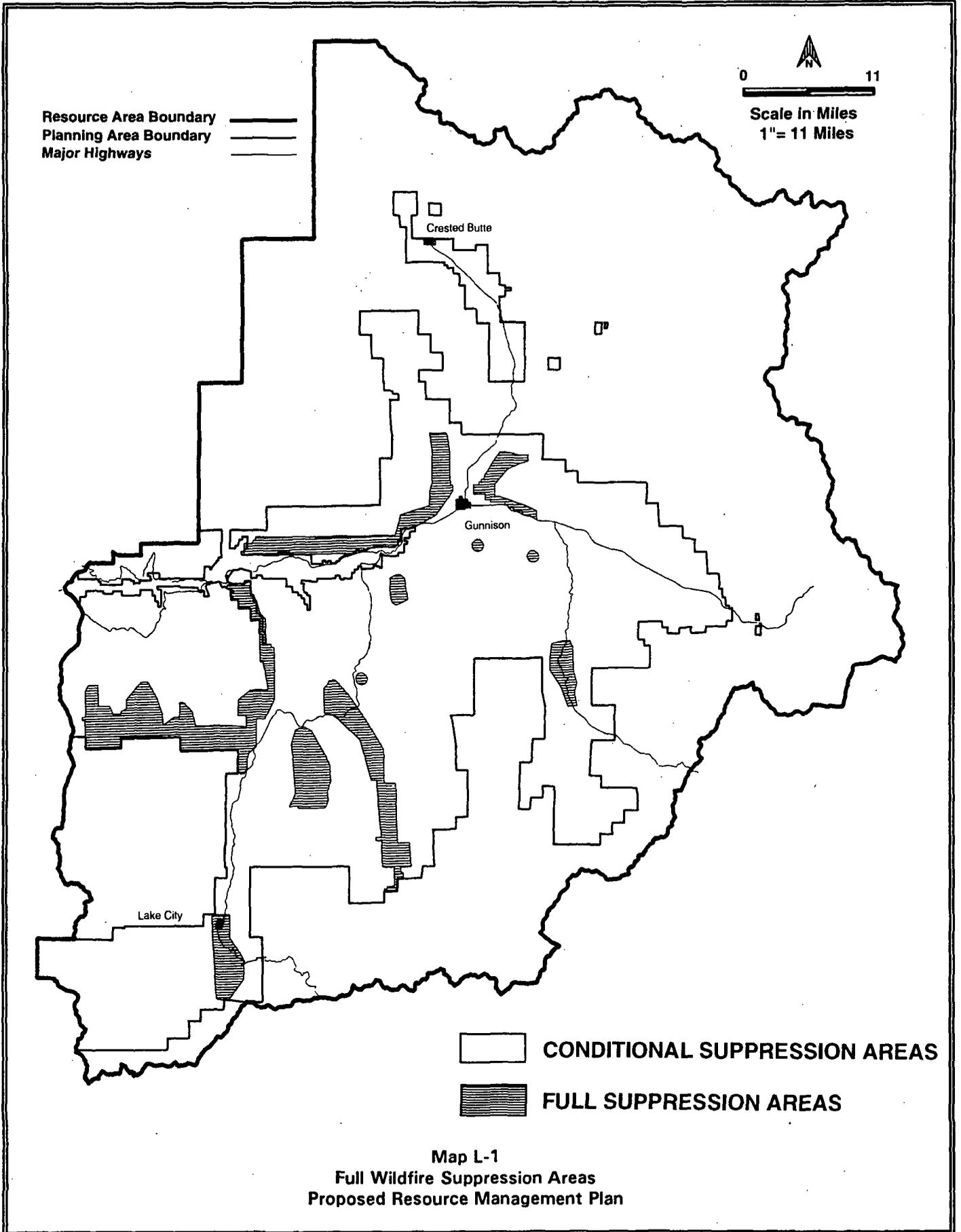
Any changes to this stipulation will be made in accordance with the land use plan and/or the regulatory provisions for such changes (For guidance on the use of this stipulation, see BLM Manuals 1624 and 3101, and Forest Service Manuals 1950 and 2820).







APPENDIX L - FIRE SUPPRESSION



APPENDIX M ACCESS

Table M-1

AREAS TARGETED FOR ACCESS IN THE PROPOSED RESOURCE MANAGEMENT PLAN

MANAGEMENT UNIT	TARGETED AREA	TYPE OF ACCESS DESIRED ¹		BENEFITTING PROGRAMS		
		PUB	ADMIN	Livestock Grazing Management	Forestry	Recreation
1	DEVIL'S CREEK	X				X
1	YAEGER GULCH, SKUNK & TROUT CREEKS		X		X	
1	ALPINE GULCH DRAINAGE (HIKING and HORSE ONLY)	X		X		X
10	ALONG ROCK CREEK	X				X
12	BEAD CREEK	X		X		X
13	HUNTSMAN MESA (FROM COLORADO HIGHWAY 149)		X	X		
13	VULCAN/BIG MUD POND	X		X		X
13	PUBLIC LANDS EAST OF DEER BEAVER CREEK	X		X		X
13	SANDY MESA (ON BLUE MESA)	X		X	X	
13	POISON DRAW (ON BLUE MESA)	X		X	X	
13	WILLOW CREEK (IN BLUE MESA AREA)	X		X	X	X

Notes: ¹ Pub. = Public Access; Admin. = Administrative Access

APPENDIX N

SOILS AND WATER RESOURCES

The table below lists target basal vegetation cover densities, expressed in percentages, for upland ecological sites in the Planning Area. These target basal vegetation cover densities apply to soils with a moderate to severe erosion potential. Additional forage could be allocated to livestock or wildlife management on these sites once these vegetative cover densities are achieved. The density of vegetation to be achieved will vary, depending upon the ecological site that exists where the activity is proposed. Determining when the target densities are reached would be accomplished by a monitoring schedule established during the planning stage for proposed activities.

Table N-1

TARGET % BASAL COVER DENSITIES TO BE ACHIEVED FOR WATERSHED NEEDS AND PROTECTION ON SOILS WITH A MODERATE TO SEVERE EROSION POTENTIAL

ECOLOGICAL SITES ON UPLANDS	% BASAL COVER OF VEGETATION
Alpine Slopes	30
Deep Clay Loam	25
Dry Mountain Loam	10
Mountain Meadow	30
Mountain Loam	17
Mountain Outwash	10
Mountain Swale	25
Subalpine Loam	30
Shallow Subalpine Loam	16

Source: Appendix F, Montrose District Soil Erosion Monitoring Guidelines

APPENDIX O

CLIMATE AND AIR QUALITY

Table O-1

TEMPERATURE DATA

STATION	ELEVATION (ft., Mean Sea Level)	TEMPERATURE (degrees F)				
		EX- TREM MINI- MUM	MEAN MINI- MUM	AN- NUAL MEAN	MEAN MAXI- MUM	EX- TREM MAXI- MUM
Cimarron	6,896	-43	22	41	61	98
Cochetopa	8,000	-39	19	37	55	92
Crested Butte	8,860	-43	20	36	52	90
Gunnison	7,664	-41	19	37	56	96
Lake City	8,670	-33	21	38	55	91
Ouray	7,840	-22	32	45	58	92
Pitkin	9,200	-31	17	33	50	83
Silverton	9,272	-37	19	36	53	85
Taylor Park	9,206	-60	16	33	49	85

Table O-2

PRECIPITATION AND FROST-FREE PERIODS

STATION	PRECIPITATION (inches)				FROST-FREE PERIOD		
	AN- NUAL MEAN	MON- THLY MAXI- MUM	MON- THLY MINI- MUM	MEAN SNOW- FALL	DAYS	MEAN BEGIN DATE	MEAN END DATE
Cimarron	14.0	1.7	0.8	67	46*	6/28*	8/13*
Cochetopa	10.8	1.9	0.6	49	49	6/21	8/09
Crested Butte	25.5	3.3	1.3	221	29	6/24	7/23
Gunnison	11.6	1.9	0.6	63	45	6/23	8/07
Lake City	14.1	2.1	0.8	90	72*	6/28*	9/08*
Ouray	21.1	2.5	1.0	134	129	5/26	10/2
Pitkin	18.0	2.2	1.1	136	2	6/29*	7/01*
Silverton	22.4	3.0	1.2	140	10	6/28	7/08
Taylor Park	16.5	2.1	1.0	151	67	6/18	8/24

*U.S. Department of Commerce (1985)

Source: PEDCO Environmental, Inc. (1981)

APPENDIXES

Table O-3

SELECTED ATMOSPHERIC DISPERSION DATA AT ALAMOSA, COLORADO

SEASON	STABILITY FREQUENCY (percent)			APPROXIMATE MIXING DEPTH (m)	
	UNSTABLE	NEUTRAL	STABLE	MORNING	AFTERNOON
Annual	29	34	37	350	2,300
Winter	21	27	52	300	1,300
Spring	26	47	27	450	2,900
Summer	39	31	30	350	3,200
Fall	29	33	38	250	2,000

Sources: PEDCO Environmental, Inc. (1981)
 (Note: Mixing depths are statewide averages).

Table O-4

SELECTED PARTICULATE CONCENTRATION DATA
 (micrograms per cubic meter)

STATION		TOTAL SUSPENDED PART.			PM-10		
NAME/TYPE	Year	No. Obs.	Ann. Geo. Mean	2nd 24-hr. Max.	No. Obs.	Ann. Arit. Mean	2nd 24-hr. Max.
Crested Butte/ Suburban	1987	--	--	--	113	35	84
	1986	21	(52)	(99)	195	44	116
	1985	58	78	276	--	(40)	(125)
	1984	81	71	191	--	--	--
	1983	80	57	341	--	--	--
	1982	23	(56)	(142)	--	--	--

Source: Colorado Department of Health, n.d.
 (Note parentheses indicate insufficient data).

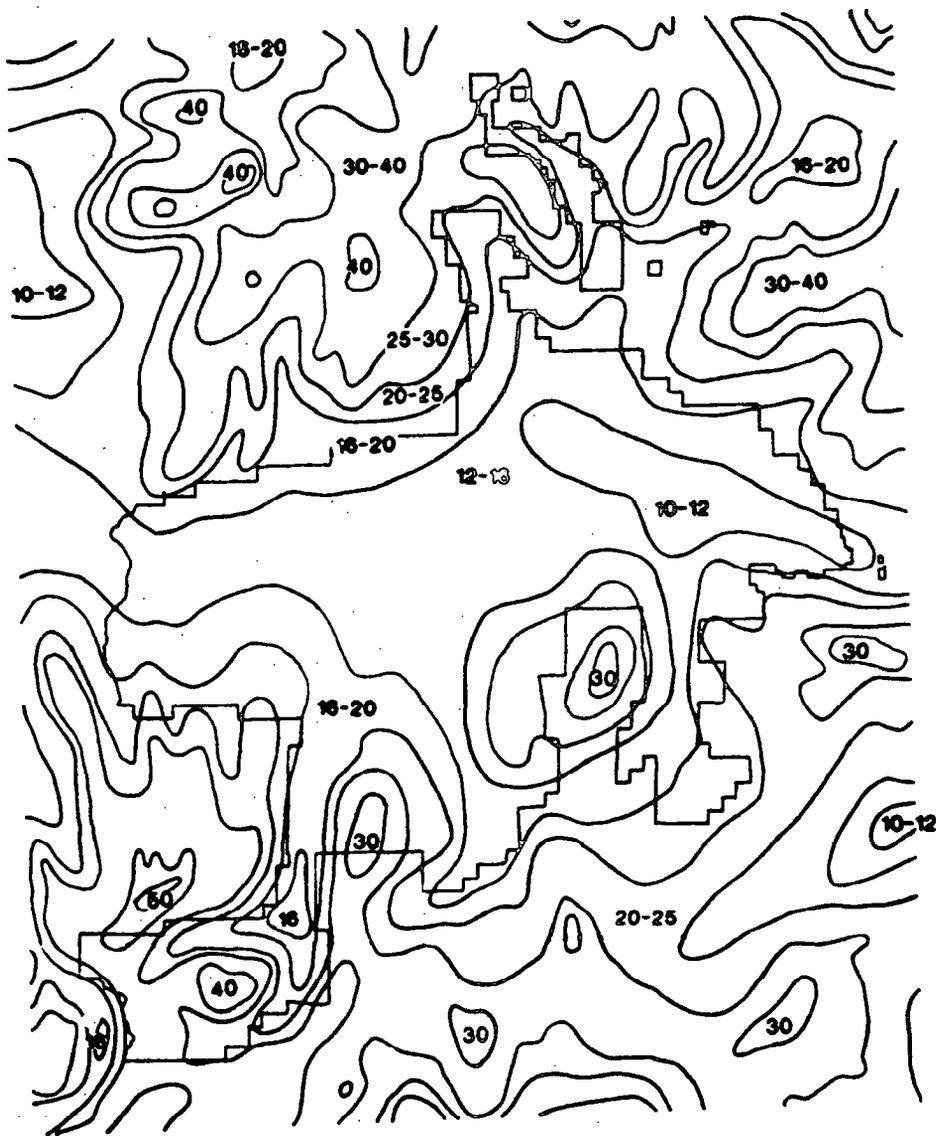
Table O-5

SELECTED ACID PRECIPITATION DATA (pH)

LOCATION/YEAR	WINTER		SPRING		SUMMER		FALL		ANNUAL	
	No. Obs	Mean								
Alamosa:										
1987	13	5.80	13	5.86	13	5.16	13	5.26	52	5.42
1986	13	5.00	13	5.86	13	5.32	13	5.03	52	5.28
1985	13	5.91	13	5.45	13	5.21	13	5.33	52	5.29
1984	13	6.02	13	6.73	14	5.36	13	5.48	53	5.51
1983	13	5.81	13	5.93	13	5.50	13	5.51	52	5.58
1982	13	5.31	13	6.13	13	5.68	13	5.47	52	5.59
Engineer Mountain:										
1987	--	--	--	--	13	4.80	13	4.95	26	4.89
1986	--	--	--	--	--	--	13	4.89	13	4.89
Molas Pass:										
1987	--	--	--	--	13	4.80	13	4.96	26	4.91
1986	--	--	--	--	5	4.76	13	4.97	18	4.89

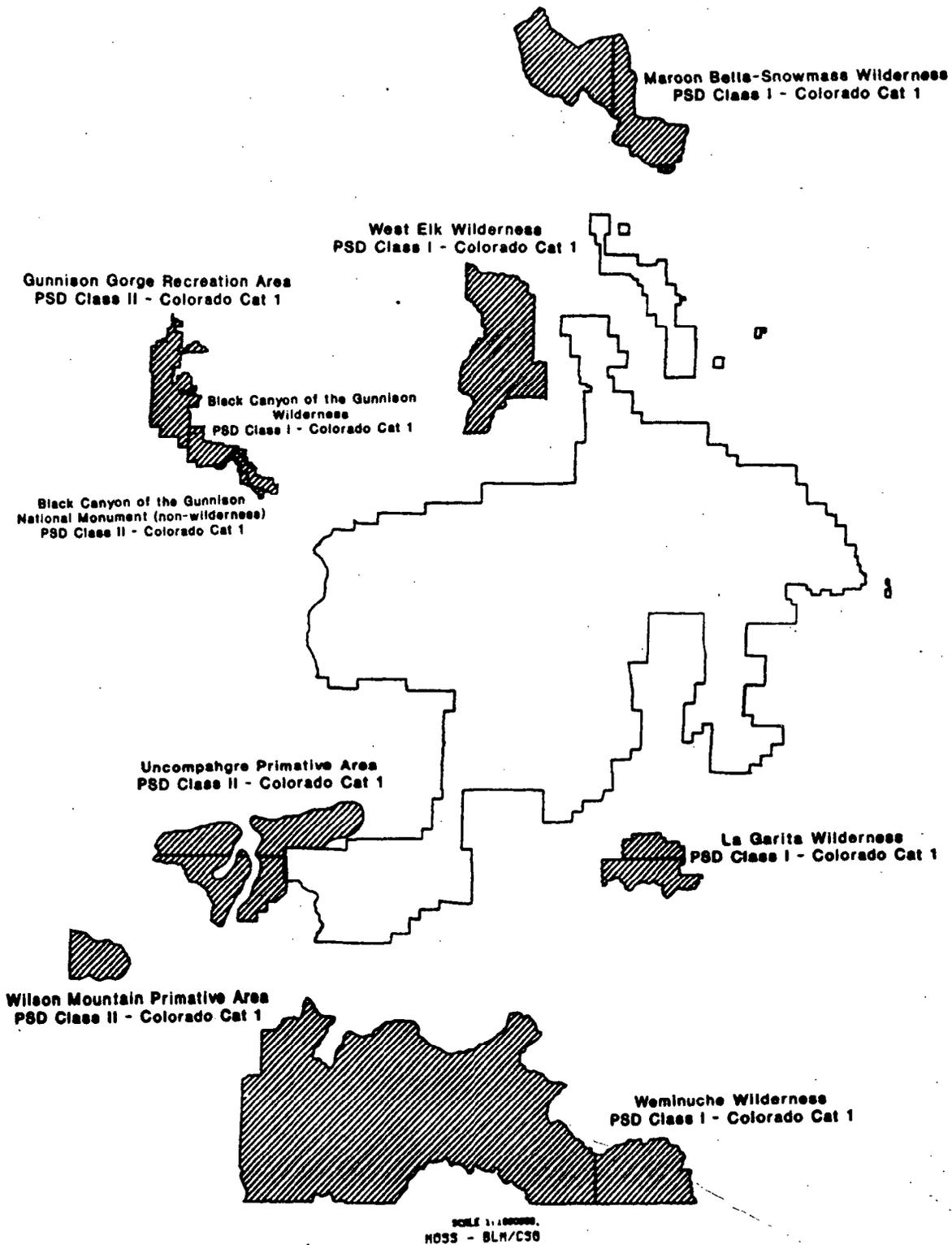
Source: NADP/NTN, 1988.

Note: Precipitation weighted averages. The natural pH of precipitation is approximately 5.6.



CONTOUR INCREMENTS			
0-7	inches	20-25	inches
7-8	inches	25-30	inches
8-10	inches	30-40	inches
10-12	inches	40-50	inches
12-16	inches	> 50	inches
16-20	inches		

Map O-1
Annual Precipitation
(1951-1980)



Map O-2
Air Quality Management Areas

APPENDIX P

PUBLIC COMMENTS RECEIVED ON THE DRAFT RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT, AND BUREAU RESPONSES

AVAILABILITY AND REVIEW PERIOD

Public participation during the early parts of the RMP process described in the Gunnison Draft Resource Management Plan and Environmental Impact Statement (DRMP). Public participation since publication of that document is described in this section.

Availability of the DRMP for review and comment was announced in the *Federal Register* on February 28, 1991, and in a news release issued at the same time. The DRMP was sent to those on our mail list in March, 1991, for a 90-day review period. The cover letter in the document announced dates and locations of public hearings that were held in April of 1991. Additional material was sent to several individuals and organizations upon request, including several documents and maps that were sent to the Gunnison County Stockgrower's Association in July of 1991.

The BLM received a total of 88 letters or cards about the DRMP. A total of seven speakers gave recorded oral comments at the two public hearings held in Gunnison and Lake City. The letters and applicable pages of the hearing transcripts are reproduced below in reduced form, along with BLM's responses to comments in the letters and those made at the hearings.

At each hearing, an informal question and answer period was followed by a presentation by the Area Manager and formal testimony or comment.

The Montrose District Multiple Use Advisory Board and Grazing Advisory Board has been kept apprised of the RMP progress and their comments and recommendations have been solicited.

A meeting with representatives of the Gunnison County Stockgrowers was held on July 10, 1991, to explain several recommendations in the DRMP, and to hear of their concerns. As a result, clarification of many recommendations in the Standard Management section for Livestock Grazing Management have been included in the same section of the PRMP.

Coordination with other agencies and assurance that the RMP is consistent with other plans was accomplished through communication and cooperative efforts between the BLM and involved federal, state, and local agencies and organizations.

The Colorado Governor's clearinghouse was supplied with numerous copies of the DRMP for review to ensure consistency with the state's ongoing plans. The team reviewed land use plans for counties in the Planning Area to ensure consistency. Bureau of Land Management personnel have met with county planners and commissioners to promote greater understanding of goals, objectives, and resources of both the counties and the BLM.

WRITTEN COMMENTS AND RESPONSES

Table P-1 below displays written commentor's names and the numbers we assigned to each individual letter or card.

Following Table P-1, each card or letter received during the comment period on the DRMP is published in a reduced form, with the BLM responses printed immediately to the right of the letter or card. The letters and cards are reprinted in the order in which they were received. Each page of each letter or card contains its identifying number in the top-

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

right corner. Each individual comment BLM responded to is highlighted on letters or cards by a bold, vertical bar, and a number. The response is identified by this same number beside the letter. The response may be printed on a succeeding page, however, in order to economize on the number of

printed pages. Once a response to a comment is printed, succeeding, similar comments are referred to that response in order to avoid reprinting a response. However, any additional information needed to thoroughly respond to a comment is included.

Table P-1
KEY TO WRITTEN COMMENTS AND NUMBERS ASSIGNED TO INDIVIDUAL LETTERS

NAME OF ORGANIZATION OR INDIVIDUAL	NUMBER ASSIGNED TO LETTER, CARD, ETC.	NUMBER OF INDIVIDUAL COMMENTS
U.S. Department of the Air Force	1	0
Colorado Off-Highway Vehicle Coalition	2	2
Tom Wilbanks	3	1
Bureau of Mines	4	2
Gary Stallons	5	1
Kent L. Rickenbaugh	6	2
Larry Watkins	7	1
William M. Folger	8	3
U.S. Fish and Wildlife Service	9	10
Earth Sciences, Inc.	10	2
Tony Merten	11	6
Kurt Aronow	12	4
Clyde W. Doran	13	0
Bill Maxon	14	2
Dennis B. Hall	15	4
Andrew McConkey	16	4
Wendell L. Zachary	17	1
Thomas Keables	18	6
Virginia Lipson	19	5
Edna Mason	20	1
Jeffrey Keidel	21	2
Mike Stabler	22	1
Kelly Curtis	23	5
Colorado Chapter, Wildlife Society	24	6
Jon Sirkis	25	2
Michelle Dolemb	26	3
Robert L. Tolfree and Claudia Hogue	27	5
Federal Highway Administration	28	0
David Christenson	29	8
John K. Maurus	30	4

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Table P-1 (Cont'd)
KEY TO WRITTEN COMMENTS AND NUMBERS ASSIGNED TO INDIVIDUAL LETTERS

NAME OF ORGANIZATION OR INDIVIDUAL	NUMBER ASSIGNED TO LETTER, CARD, ETC.	NUMBER OF INDIVIDUAL COMMENTS
Thomas P. Quinn and Carol M. Quinn	31	5
Thomas L. Holderfield	32	5
Kirt Darner	33	1
J.P. Wingate	34	1
Ralph E. Clark III	35	30
U.S. Fish and Wildlife Service	36	10
Jim Yonan	37	4
Kenneth P. Ochs	38	47
Erich Hill	39	1
Kristan Pritz	40	1
L. Richard Bratton	41	1
John M. Ritchey	42	2
Tek Resources, Inc.	43	0
Mark Pearson	44	3
John Czarnecki	45	5
James A. Bailey	46	12
Colorado Division of Wildlife	47	12
Robert Hyde	48	4
Wilderness Study Group, Univ. of Colorado	49	4
Gunnison County Stock Growers Association	50	41
Yosi Lutwak	51	18
Hugh Jameson	52	5
Jamey Crawford	53	1
Colorado Division of Wildlife	54	17
Barbara Bernhardt	55	5
The Wilderness Society	56	3
Patricia Wislow	57	4
National Park Service	58	17
E.D. Howard & Sons	59	8
Soil Conservation Service, Gunnison	60	9
Rocky Mountain Oil & Gas Association	61	6
Beth Juliuskodje	62	3
High Country Citizens' Alliance	63	27
Jan Holt	64	3
SINAPU	65	11
Shavano Soil Conservation District and Montrose Soil Conservation Service	66	7
Colorado Environmental Coalition	67	20
Montrose Motorcycle Trail Riding Association	68	1

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Table P-1 (Cont'd)
KEY TO WRITTEN COMMENTS AND NUMBERS ASSIGNED TO INDIVIDUAL LETTERS

NAME OF ORGANIZATION OR INDIVIDUAL	NUMBER ASSIGNED TO LETTER, CARD, ETC.	NUMBER OF INDIVIDUAL COMMENTS
Taylor Park Cattle Pool Association	69	6
Iola Powderhorn Stockgrowers Association	70	8
Mike Howard	71	5
American Rivers	72	10
Gunnison County Electric Association, Inc.	73	1
Blue Mesa 4-Wheelers	74	1
Dick Wilson	75	1
Nicolas Brothers	76	7
Laurence N. Currier and Mrs. L. M. Currier	77	4
Kenneth P. Ochs	78	3
Dana Ivers	79	4
Mike Cockrell	80	5
Gunnison County Commissioners	81	22
Dray, Madison, & Thomson	82	17
Colorado Cattleman's Association	83	0
Dray, Madison & Thomson	84	3
Colorado Natural Areas Program	85	4
U.S. Environmental Protection Agency	86	5
Town of Crested Butte	87	7
Colorado Division of Water Resources	88	2

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Response to Letter 1

Thank you for your letter.



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
REGIONAL ENVIRONMENTAL OFFICE, CENTRAL REGION
528 GRIFFIN STREET, ROOM 308
DALLAS, TEXAS 75202-0923

20 MAR 1991 MAR 22 A9:00

Mr. Robert Moore
State Director
Colorado State Office
2850 Youngfield Street
Lakewood, Colorado 80215

Dear Mr. Moore

Thank you for providing us the opportunity to review the draft Resource Management Plan and Environmental Impact Statement for the Gunnison Resource Area, Colorado.

Our review indicates that no Air Force military training routes presently exist within the study area mentioned above. Therefore, no potential conflicts are known to exist between the missions of our respective agencies. However, routes do exist to the east of the study area. Training routes and airspace requirements of the military do occasionally change. In the event a conflict should ever arise, we are available to assist you in establishing liaison between your agency and the appropriate Air Force organization. This is one of the primary roles of our organization.

We appreciate the opportunity to comment on these documents and trust the above information is useful in your planning process. We also look forward to continued communication with your office. If additional information is needed, please contact Mr. Raymond Bruntayer, telephone (214) 653-3341.

Sincerely

Scott E. Stehman
SCOTT E. STEHMAN, CAPT, USAF
DEPUTY DIRECTOR
REGIONAL ENVIRONMENTAL OFFICE
CENTRAL REGION

Atch
Training Route Map

Cy to: HQ USAF/LEEYN
140 TFW/DOT
BLM Montrose District
Manager

Responses to letter 2

1. Thank you for your comments on alternative formulation in the plan. Your comments were given consideration in the development of the PRMP.
2. The designation of an ACEC is designed to provide management emphasis and attention for areas where special resources could be severely or irreparably damaged if not properly managed. In the PRMP restrictions are imposed only if it is anticipated that those resources could be damaged by a use or an activity. OHV use would not be eliminated but rather regulated in some ACECs to assure that damage to special resources does not occur.

MEMBERS
Colorado Snowmobile Association
Colorado Motorcycle Dealers Association
Rocky Mountain Enduro Circuit
Colorado Association of 4-Wheel Drive Clubs, Inc.
Burgundy Ridge Motorcycle Management Committee
Motorcycle Trail Riding Association



EX OFFICIO ADVISORS
U.S. Forest Service
Rocky Mountain Region
Bureau of Land Management
Colorado State Office
Colorado Division of Parks and Outdoor Recreation

April 2, 1991

Bill Bottomly
Gunnison RMP Team Leader
Bureau of Land Management
2505 So. Townsend Ave.
Montrose, CO 81401

Mr. Bottomly:

1 It appears that "Alternative B" is the best alternative in that it emphasizes the economic dependence of the local communities on surrounding public land. This area is one of the most depressed in Colorado and further restrictions to recreational and extractive uses of BLM land could compound the economic stress of area residents.

2 "ACEC's" are as impactful as wilderness to some types of recreation and other uses of public land. True economic studies should be made prior to any designation that would exclude certain historic uses of public land.

John C. Maxlin
John C. Maxlin
Director
Co-Chairman, Recreational Resources Committee

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 3

APR 9 7 1991

3

1200 South Belt Line
Mesquite, TX 75149
April 5, 1991

Bill Bottomly
RMP Team Leader
Bureau of Land Management
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Bottomly:

I am writing to express my appreciation of and support for the recommendations for American Basin in Alternative E of the Resource Management Plan for the Gunnison Resource Area. I am glad that recognition is made of "the midsummer wildflowers and high-quality visual resources" of that area. I am especially grateful that there is a recommendation that "domestic livestock grazing ... would not be authorized in the unit in order to maintain and protect scenic resources." I assume this means that domestic sheep would not be allowed in the area. One of my fondest memories, recorded in pictures on my office wall, is of being in American Basin and at Sloan's Lake when there were NO sheep and the wildflowers were outstanding. MANY people have asked me where the pictures were taken. But when we were at Lake City two years ago and I planned to go to American Basin, I was told by a man in town that sheep were being grazed there and there were few wildflowers, so I came on home the next day instead.

I also appreciate the recommendation that "Motorized vehicular travel would be limited to designated routes within the unit in order to prevent destruction to wildflower concentrations and visual resources in general."

Thank you for your sensitivity in preserving this beautiful area - and in getting the sheep out of American basin.

Sincerely,

Tom Wilbanks
Tom Wilbanks

- 1. The PRMP has been changed to allow sheep grazing on the American Basin ACEC (Management Unit 4). However, use would be restricted during the time of peak recreation visitation.

4

Responses to letter 4



United States Department of the Interior
BUREAU OF MINES
INTERMOUNTAIN FIELD OPERATIONS CENTER
P.O. BOX 25086
BUILDING 20, DENVER FEDERAL CENTER
DENVER, COLORADO 80225



April 15, 1991

Memorandum

To: Bill Bottomly, RMP Team Leader, Bureau of Land Management, 2505 South Townsend Avenue, Montrose, Colorado 81401

From: Chief, Intermountain Field Operations Center

Subject: Review of Draft Gunnison Resource Management Plan and Environmental Impact Statement, Montrose District, Colorado

In response to your request for Bureau of Mines comment on the subject document, personnel of the Intermountain Field Operations Center reviewed the draft Management Plan and Environmental Impact Statement (EIS). With plans such as this, the Bureau of Mines is concerned primarily with possible impacts on mineral resources or production facilities.

Mineral resources, including locatable, leasable, and salable mineral are addressed the document. Under the preferred alternative (E) most the areas favorable for locatable minerals, as identified by the Bureau of Mines in Special Publication, Availability of Federal Land for Mineral Exploration and Development in Western States: Colorado, 1984, plate 1), are in Management Units (E-12 and E-13) where exploration and development would be permitted. About 674,490 of the 728,600 acres of federal mineral estate is open, although many acres are subject to restrictions that effectively could close the areas to mineral resource development. The acreage subject to possible restriction is not identified in the document. Most favorable areas for oil and gas, geothermal, and salable resources are available, some with restrictions (Appendix K - Oil and gas stipulations, page references to the main text for Alternatives B, D, and E have no page numbers). The summary of Irreversible and Irrecoverable Commitments of Resources (p. 4-74) states that "Once a particular area has been committed to a single, non-mineral use, it is not likely that the use would be reversed." As a result, any mineral resources within these areas would be irreversibly lost to development. The Bureau of Mines recommends limited use of this management option and full consideration be given to all resources in a management area before it is designated for any single-use purpose. We believe a policy that allows as much land with mineral

- 1. Other than the 54,047 acres that would be withdrawn from mineral entry and location in the PRMP, the only other type of restriction on locatable minerals would be that plans of operation would be required for operations on 42,339 acres of public land recommended for ACEC designation (Management Units 4 through 9). This restriction is not an exclusion, but rather presents an opportunity for BLM to work with operators regarding stipulations and mitigation during the preparation of these operating plans. See Table 1-1, Chapter Two, in the PRMP, for areas that would be withdrawn from mineral entry and location in the various alternatives.
- 2. Please see the response to comment 1 of letter 4. The vast majority of land in the planning area would be managed for a variety of multiple uses. Mineral resources on 54,047 acres of lands withdrawn from mineral entry and location would be unavailable for development and are considered irretrievable.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

4

potential as possible remain open to mineral entry is clearly in the national interest.

Sincerely,

William Cochran
William Cochran, Chief
Intermountain Field Operations Center

EKP/bde

5



NATIONAL PHOTOGRAPHERS ALBUM CO.

921 N. MAIN ST. • P.O. BOX 891 • FORT WORTH, TEXAS 76101

April 19, 1991

Mr. Bill Bottomly
RMP Team Leader
Bureau of Land Management
2505 South Townsend Ave.
Montrose, CO 81401

Dear Mr. Bottomly:

I am a property owner on the upper Lake Fork of the Gunnison river. My property contains approximately 4.3 acres and one-third mile of river frontage. The property is located at about the point where Wager gulch enters the river, so I am not sure if the location would be in segment A or B of the BLM's wild and scenic river study.

At any rate, I wish to enter this letter as my objection to any attempt to designate this segment of the Upper Lake Fork river as a wild and scenic river. The scenic values of the river in this area contribute little to the overall beauty of the scenery. We already have too much of the surrounding area designated as wilderness areas and including segments A or B would only further restrict the enjoyment and use of the area to that small minority of backpackers and hunters.

Thank you for the opportunity to comment on this issue.

Sincerely,
Gary Stallons
Gary Stallons
1139 Melody Lane
Roanoke, TX 76262

GS/jv

Responses to letter 5

1. Thank-you for your letter expressing concern over the Wild and Scenic River issue. Your comments were considered in the preparation of the PRMP.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 6

6

KENT AND CAROLINE RICKENBAUGH

KRI- RANCH E
PARLOR CO

FUYU FARMS
PALMA VALLEY, CA

April 18, 1991

Mr. Barry Tollefson
Bureau of Land Management
216 North Colorado
Gunnison, Colorado 81230

RE: Alternative C Category 1
Disposal Tracts 6 & 46
Pages D3 and D5

Dear Barry:

On April 4, 1991 Bart Rickenbaugh and I met with Art Hayes to discuss the Gunnison Resource Area Resource Management Plan and Environmental Impact Statement (EIS) particularly with respect to allotment 6307 for the above referenced tracts. Pages 3-128, 4-62, 4-66 indicate a preferred alternative of eliminating grazing on 40 acres of tract 46. The following points were discussed:

- 1) The referenced area has been an integral part of our ranch operation for a long period of time. The head gate for the Vader-Rausis ditch is situated at the western boundary of the tract. The ditch serves our ranch and several others down stream. Water rights from this ditch precede the existence of the BLM.
- 2) Our lease with the Vaders does not make any reference to this "Taylor Park" grazing permit and we therefore, assume full responsibility as well as control of its use.
- 3) Our long range goals for the ranch are to achieve a balance between grazing and wildlife habitat.
- 4) The above permit covers both referenced tracts.
- 5) We feel that the riparian zone of tract 46 is closer to 20 acres then 40 acres.
- 6) The intermittent flow in Sewell Gulch is in a narrow channel. The pasture portion of the area is primarily irrigated by waste water from the Field property north of Highway 50. We do not control this water.

Keeping the above in mind, we respectfully request that the BLM review the preferred alternative in light of the following grazing plan for the tract worked out with Art:

MAILING ADDRESS - 777 BROADWAY, DENVER, CO 80203 / (303) 573-7773

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Page 2
April 18, 1991
Mr. Tollefson

- 1) There will be no grazing north of Tomchi Creek in the riparian area until September 1, 1991.
- 2) The area may be grazed after September 1, 1991 in compliance with the terms of the permit including "move off" with an objective of maintaining a 4" stubble height.
- 3) Salt blocks have been moved into the sage brush on the hill sides.
- 4) The success of this grazing plan would be reviewed in the Spring of 1992 in relation to mutual objectives of the BLM and our ranch operations.

I would be remiss in not pointing out the fact that EIS lists both of the above tracts as Disposal Property. As you know, we stand ready to purchase the tracts for cash - the most practical solution to BLM management expenses associated with them.

Would you be kind enough to acknowledge receipt of this input and advise me as to when we can expect your decision. Thank you for your consideration of this request.

Sincerely,
FUYU FARMS

Kent L. Rickenbaugh

KLR/pam

cc: Mr. Art Hayes
Mr. Bob Wright
Mr. Harry Vader

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Response to letter 7

7

1. Thank you for your letter. Your comments were taken into consideration in the formulation of the PRMP.

419 W. Navajo Rd.
Flagstaff, AZ 86001
May 9, 1991

Mr. Bill Bottomly, Team Leader
BLM District Office
Montrose, Colorado

Dear Mr. Bottomly:

Thank you for providing me with the Resource Management Plan and EIS on the Gunnison Resource Area and allowing me the opportunity to comment thereon.

The following comments are based on the perspective of occupying a summer residence in the area for the past seventeen years. I am extremely familiar with the upper Lake Fork of the Gunnison River from Sloan Lake to the Sherman townsite but also familiar with all of Hinsdale, southern Gunnison, and eastern San Juan and Ouray counties. I have no economic self-interest in the area other than homeownership.

My first concern deals with degradation of the environs which has occurred over the past seventeen years due to increasing visitor use and misuse. People by their very nature are intrusive especially when they employ motorized vehicles. A portion of total visitors have consistently violated "designated roadway rules". Increasing the number of visitors via changes in demographics, increased leisure time, or designation of Alpine Triangle SRMA without adequate funding and resolve to monitor activities, simply increases the absolute number of violations and the consequent damage. Increased numbers also puts pressure on the finite number of "good camping sites" further degrading those particular areas. Machine (vehicle) noise, road dust, and the visual impact of more visitors reduces the quality of the experience for all of those in the area. Is it better for 150 people to have an outdoor experience or for 100 to have an exceptional outdoor experience? This is a quality of life/experience issue that seems to be overlooked in many analysis.

I concur that further development may significantly improve the economic condition of Lake City (et al) but not without cost to the millions of US citizens that do not reside in Lake City, Silverton, Ouray, etc. The individuals that chose to move to these communities did so without being coerced. No one forced individuals to buy or start business in these communities. I reject the notion that US public lands should be managed to enhance local economies; economies that have a one-hundred year history of marginal survival.

My second item of concern deals with livestock grazing. I am familiar with the nation-wide controversy that surrounds this topic as are you I'm certain. Grazing has historically had a

7

negative impact on the areas in question. Even well-meaning permittees (ranchers) cannot realistically guarantee that their on-site herders will abide by the terms and conditions of the permit. As the range management specialist will attest, they simply do not have an appreciation for the complexities of the situation and often language barriers prevent successful resolution of conflicts that do occur. In the 36-72 hours necessary to resolve permit condition violations the damage is done. When ranchers are less than well-meaning, damage is even more wide spread. When cattle grazing was active in the area, it was common to observe 20% more cattle than was allowed under the permit.

Based on the above observations and concerns combined with the prevalent national attitudes toward conservation of public resources, it appears that alternative D is the only viable alternative. Anything that even indirectly causes increased visitor pressure will reduce the quality of the experience for visitors and residents alike.

As an aside, I agree that designation of the Upper Lake Fork of the Gunnison River as a wild and scenic river is not the best approach. I believe that such a designation will put more visitor pressure on an area that is already suffering degradation due to over use.

Thank you for the opportunity to express my opinions.

Sincerely,


Larry Watkins, Ph.D.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 8

8

May 14, 1991

Bill Bottomly, Team Leader
Bureau of Land Management
2805 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Bottomly:

Colorado Environmental Coalition, which I serve as a board member, has my complete support in recommending these changes in the management plan and environmental impact statement for the Gunnison Resource Area:

- 1 - designating all the Lake Fork of Gunnison River as wild and scenic.
- 2 - making Alpine Triangle, East Gunnison, Cebolla Creek and West Antelope Creek areas of critical environmental concern.
- 3 - adopting more protective grazing management.

Please consider these improvements very seriously.



Professor William M. Folger
2390 Locust Street
Denver, Colorado 80207-3448

1. The BLM received several comments similar to this one. The response to the comment is referenced hereafter for all similar comments.

Regarding the wild and scenic river study process, BLM's responsibility is to examine streams within their jurisdiction and make three determinations: 1), are there any rivers that are eligible for designation?, 2), for those rivers that are eligible, what is their potential classification?, and 3), which eligible rivers are suitable for designation? The BLM then makes a recommendation concerning designation or non-designation. Actual designation of rivers into the National Wild and Scenic Rivers System is the responsibility of Congress, rather than BLM. In the study process for this RMP, only segment A of the Lake Fork of the Gunnison River was found to be eligible (i.e., determined to have free flowing status and at least one outstandingly remarkable quality). Although determined to be eligible, the segment was found not to be suitable for inclusion into the system. The segment was not recommended for designation in the Preferred Alternative of the DRMP or the PRMP. The study process and findings are documented in Appendix I, of the PRMP. Appendix I in the PRMP also documents the interdisciplinary analysis for the rest of the streams in the planning area.

2. The BLM received several comments similar to this one. The response to the comment is referenced hereafter for all similar comments.

Some very important values in the Alpine Triangle area can be appropriately managed according to the prescriptions for Management Units within the Alpine Triangle Special Recreation Area (units 1, 4, 5, 6, and parts of 15), and existing and future policies, regulations, and laws. Portions of the Alpine Triangle area in which special management concerns exist are recommended for ACEC designation (unit 5, Red Cloud Peak, unit 4, American Basin, and unit 6, Slumgullion Slide National Natural Landmark) in the Preferred Alternative of the DRMP, and in the PRMP.

The bighorn sheep herd in Cebolla Creek (Unit 10) can be sufficiently protected through seasonal limitations and management of domestic sheep grazing. The area has little potential for mineral development. Therefore, in the judgement of BLM, these prescriptions, conditions, and existing laws, regulations, and policy are sufficient to manage the area, and an ACEC designation for the lands is not needed.

The East Gunnison Area (Unit 12 in the PRMP) contains public lands with crucial elk and deer winter range. To protect this value the PRMP prescribes seasonal restrictions from disruptive activities and OHV limitations during critical wildlife periods. A Coordinated Resource Activity Plan (CRMAP) would be written and would address the need to protect and enhance the wildlife winter range. BLM feels that these provisions will sufficiently protect the values of the area and special ACEC designation is not needed.

The West Antelope Area (Unit 7 in the PRMP) is recommended for designation as an ACEC (28,215 acres) in the DRMP and PRMP. This area has high concentrations of elk and deer; it envelopes the Colorado Division of Wildlife Sapinero State Wildlife Area; it is bald eagle habitat; it has the Dillon Mesa bighorn sheep herd; and it receives extensive recreational use (especially hunting). Therefore, in addition to restrictions, BLM proposes to designate the area as an ACEC.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

- 3. The BLM received several comments similar to this one. The response to the comment is referenced hereafter for all similar comments.

Numerous actions were included in Standard Management and various Management Unit prescriptions in the Preferred Alternative in the DRMP to improve livestock grazing management on public lands, both on uplands and in riparian zones. Some of these include exclusions or restrictions on range treatment or project implementation, season of use and type of use changes, elimination of grazing in some locations, and minimum stubble heights and a specified percent of forage use that would be permitted. Please refer to the Standard Management section of Chapter Four in the PRMP, and the individual unit prescriptions to see how these actions were carried forth from the DRMP into the PRMP.



United States Department of the Interior **9**
 FISH AND WILDLIFE SERVICE
 COLORADO FIELD OFFICE
 730 SIMONS STREET
 ROOM 202
 GOLDEN, COLORADO 80401

IN REPLY REFER TO:

FWE/CO:BLM:Gunnison Resource Area
 MS 65412 GJ

MAY 15 1991

Memorandum

TO: Resource Management Plan Team Leader, Bureau of Land Management, Montrose, Colorado

FROM: Colorado State Supervisor, Fish and Wildlife Enhancement, Colorado State Office, Golden, Colorado *Lawrence R. Parker*

SUBJECT: Draft Environmental Impact Statement and Resource Management Plan for the Gunnison Resource Area

We have completed our review of the draft environmental impact statement (DEIS) and resource management plan (RMP) for the Gunnison Resource Area (GRA). We have given most of our attention to threatened and endangered species and wetland issues that are disclosed for Alternative E, the preferred alternative.

GENERAL COMMENTS

The preferred alternative recognizes the importance of continuing to consult with the Fish and Wildlife Service (Service) for those activities that may impact Federally listed threatened or endangered species. This alternative also proposes to designate specific areas within the GRA for the protection of the skiff milkvetch (*Asragalus microcymbus*), a Federal candidate species, and the Uncompahgre fritillary butterfly (*Holoria accrocneema*), a federally proposed species. The draft DEIS/RMP also acknowledges the previous coordination that has occurred between our agencies. However, we believe the DEIS/RMP could be improved by giving more attention to the following issues: (1) Wetlands; (2) Water depletion from the upper Colorado River basin; (3) the boreal western toad (*Bufo boreas boreas*), a Federal candidate species; (4) prairie dog distribution and abundance; and (5) black-footed ferrets (*Mustela nigripes*).

Wetlands are a unique vegetative community that can provide habitat for many species of wildlife. In recent years, many Federal agencies have dedicated a significant amount of effort to inventory wetlands and better define their value. The DEIS/RMP has no discussion of the wetland types or values that may occur in the GRA. Based on our limited knowledge of the GRA, we believe wetlands probably exist. We believe the Bureau should therefore, give consideration to qualify and quantify the various types of wetlands that may exist on the GRA.

Responses to letter 9

- 1. The PRMP recommends that BLM would inventory, classify and consider wetlands in all plans for surface-disturbing activities on public land. Refer to the Riparian Zones paragraph(s) in the Standard Management section, in Chapter Four of the PRMP for exact language for wetlands management, and to the Glossary for a definition of wetlands.
- 2. The statement on page 2-14 in the DRMP pertaining to trans-basin water diversions was made to make the reader aware that the possibility exists for future diversions to occur. Trans-basin water diversions and allocation of water rights are beyond the scope of this RMP. At present, the only proposal to divert water from the Upper Gunnison River Basin is by Arapaho County, and is still in litigation. Arapaho County's existing proposal would have no significant impact on public lands. If trans-basin water diversion proposals, and associated facilities that could affect public land do materialize during the life of the plan, BLM would evaluate these for potential impacts and respond accordingly. Actions, recommendations, and authorized activities in the land use plan would result in a minuscule and insignificant amount of water depletion in the context of the basin.
- 3. We have added this information to Table 2-12 (See Chapter Three, in the PRMP). BLM would follow the same management procedures regarding this species as identified under the Special Status Plant and Animal Species and Habitat section of Standard Management in the PRMP.
- 4. Prairie dog abundance and distribution was not discussed in the DRMP because their numbers on public lands in the resource area are limited and are not in sufficient quantities to provide benefits to ferret recovery during the life of this plan.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

2 The DEIS/RMP recognizes that water resources within the GRA may be utilized for trans-basin diversions to the East Slope (page 2-14). We believe any depletion of water from the Upper Colorado River Basin is an impact to the federally listed fish species occurring in the Basin, and therefore would trigger a "may effect" finding under the Endangered Species Act (Act). Consequently, we believe Chapter 4 (Environmental Consequences) should determine whether water depletion will occur with any of the alternatives and disclose the quantity of depletion (in acre-feet) occurring with each alternative.

3 The boreal western toad is a category 2 candidate species. This toad inhabits marshes and wet meadows and similar habitats generally between 8,500 and 11,000 feet. There are historical records of this toad from southern Hinsdale and northern Gunnison counties. Due to the recognized declining status of this toad and its historical occurrence within the GRA, we believe it should be included in Table 2-12 (page 2-19). There should also be some consideration to determine the toad's current status on the GRA.

4 Recently, the Service received an inquiry from Dr. James Fitzgerald of the University of Northern Colorado regarding the status of the Gunnison subspecies of the Gunnison prairie dog (*Cynomys gunnisoni gunnisoni*) throughout its historical range (this is the subspecies that occurs in the GRA). He presents evidence suggesting a significant decline in the abundance and distribution of this animal. Due to this inquiry, the value of prairie dogs to many other species, and the potential implications to ferret recovery, we believe it is appropriate for the DEIS/RMP to address prairie dog abundance and distribution in the GRA.

5 We find no significant attention to the black-footed ferret in the DEIS/RMP. Although we know of no historical records of black-footed ferrets from the GRA, it is generally believed they overlapped the range of all prairie dog species in Colorado. For the past three years, and through a multi-agency working group, there has been an ongoing Statewide effort to inventory prairie dog distribution. The purpose of this inventory is to attempt to resolve prairie dog management issues and identify candidate black-footed ferret reintroduction sites. Your State Office, and the White River and Little Snake Resource Areas, have been involved with this activity for several years. Due to these ongoing recovery efforts, and the presence of prairie dogs in the GRA, we believe the DEIS/RMP should dedicate more attention to the black-footed ferret. Although page 3-103 makes a generic statement regarding the reintroduction of threatened and endangered species, we ask the Bureau to determine whether this is adequate to obviate the requirement of an amendment to the

5. The Planning Area contains historical habitat for the black-footed ferret, an endangered species, as noted on page 2-18 and 2-19 of the DRMP. Should a candidate reintroduction site for black-footed ferrets be identified during the life of the plan, a plan amendment would not be necessary in order to consider reintroducing the species. According to the PRMP, such actions may be authorized, following preparation of a release or reintroduction plan, environmental analysis, and consultation with appropriate federal, state, and local agencies, and other affected parties. See the section in Standard Management in the PRMP entitled Special Status Plant and Animal Species and Habitat.
6. Thank you for bringing this confusing language to our attention. Refer to the Special Status Plants and Animals section in Standard Management of the PRMP that clears up this confusion.
7. Thank you for the information. The Uncompahgre fritillary butterfly was listed as an endangered species by the USF&WS on June 24, 1991. Table 2-12 and Chapter Two of the DRMP have been changed accordingly. The Management Unit 5 prescription in the PRMP for the Red Cloud Peak ACEC also reflects the new status of the species.
8. Thank you for the information. A change has been made to Table 2-13, page 2-20 in the DRMP to reflect this new information regarding Gunnison Milkvetch observations.
9. The requirement for consultation with the U.S.F.&W.S. for any activity causing impact to federally listed species is noted in the Standard Management section of the description of the PRMP. If different buffers would be required to protect a species, BLM would stipulate the requirement in authorizations for discretionary actions.
10. Thank you for the information. See Appendix J in the PRMP for the updated language.

5 RMP, should a candidate reintroduction site for black-footed ferrets be identified.

SPECIFIC COMMENTS

Page 3-1, table 3-1: If water depletion will occur due to any of the anticipated activities authorized by the RMP, compare these depletions for each of the alternatives. Also, include a comparison for the wetlands associated with each alternative.

Page 2-14, vegetation: There should be a discussion of wetlands. We believe it would also be appropriate to categorize the wetland according to Cowardin et al (1979).

6 Page 2-18, Special status plant and animal species and habitat: The Endangered Species Act (Act) provides full protection to only federally listed species. Delete the reference to "sensitive species".

Page 2-18, animals: Add the boreal western toad to the text, and include it in table 2-12.

7 Page 2-19, invertebrates: The Uncompahgre fritillary butterfly was proposed for listing as an endangered species on October 15, 1990. This new designation should be recognized, and the species should be added to table 2-12. The animal now receives protection under the Act.

8 Page 2-20, table 2-13: *Astragalus anisus*, the Gunnison milkvetch, occurs on Bureau land in the Parlin area and undoubtedly on similar habitat elsewhere in the Gunnison Valley. There is recent data on this species. John Anderson, our staff botanist has observed it there in 1989 and 1990. A collection label from 1989 is attached, as well as a list of older collections. There is no current data to indicate whether this species is common or rare. However, it is still a Gunnison Basin endemic, and thus a localized species.

Page 4-56, Impacts on soils and water resources: This section should conclude whether any water depletion will occur with the preferred alternative, as suggested on page 2-14, trans-basin diversion.

9 Page 4-59, Impacts on special status plant and animal species and habitat: It may be appropriate to restate the requirement for formal section 7 consultation for any activity causing impact to federally listed species. This could also relate to the land disposals referenced in the document.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

- 9 Appendix A, table A-4: We believe spatial and temporal buffers can be effective in reducing potential impacts. We again emphasize that any required consultation under the Act may recommend buffer zones that are different than those provided in this table.
- 9 Page G-1, threatened, endangered, and sensitive species: It is obvious that specific situations may require measures to avoid or offset potential impacts that are not shown here.
- 10 Page J-1: Most of this page recites text from the Federal Register that lists those species considered Federal candidates. This list is published by the Service biannually. We believe some of the text you reference is outdated: for example, the second sentence of the second paragraph ("Also...extinct"). We believe you should reference the January 6, 1989 Federal Register for correct terminology and interpretation. You may want to wait for the newly revised list which should be published soon.
- Appendix K: Again we wish to emphasize that any required Section 7 consultation may recommend stipulations not identified in other documents.

Attachment

cc: CDOW, Montrose
 FWE, Golden
 FWE, Grand Junction
 FWE, Salt Lake City

Bleachman:jw:gunnrm.47:5/2/91



EARTH SCIENCES, INC.

10

May 16, 1991

Mr. Bill Bottomly
 Department of Interior
 Bureau of Land Management
 Gunnison RMP/EIS Team Leader
 2505 South Townsend Ave.
 Montrose, CO 81401

RE: 1. Gunnison Resource RMP/EIS
 2. ESI Letter of December 16, 1988.

Dear Mr. Bottomly:

Thank you for the copy of the Gunnison Resource RMP/EIS (March 1991). It is difficult for ESI to rate the four alternative management plans presented since each case fails to recognize the importance and even the existence of the Red Mountain Alunite Deposit. We consider this resource of alumina, potash and sulfur to be one of the most valuable factors to be considered.

Subsequent to the exploration program under exploration permit C-11418 which was granted November 1, 1974, the deposit has been held under PRLA C-11418. To our knowledge, it is the largest and highest grade deposit of alunite in the world.

ESI and its affiliates have spent millions of dollars to identify, explore and design a program for development of the resource. The lease on the deposit is being held up because of legislation passed in 1983 prohibiting expenditures for processing mineral leases in Wilderness Study Areas. At some time the Red Mountain area will cease to be a WSA and a lease will be granted. To do otherwise would be a travesty that the courts certainly will not allow to be perpetuated on the people of the United States as well as the thousands of ESI shareholders whose money has been spent on the project.

The United States is dependent upon imports for 98% of its alumina, 68% of its potash and 11% of its sulfur. These are the commodities that will be produced from the Red Mountain Alunite Deposit. This dependence will, without question, grow in future years.

The deposit is large enough to produce 10 million tons of alumina each year throughout the 21st century from an area of only 660 acres. If it is assumed that the government receives a royalty equivalent to \$1 per ton of alumina. The

910 12th Street • Golden, Colorado 80401 • (303) 279-7641
 Telex 45-704 • Fax (303) 279-1180

Response to Letter 10

1. The proposed management actions in the DRMP or PRMP would not preclude development of the Red Mountain Alunite deposit, now or in the future. The valid existing right by Earth Sciences would continue. The DRMP, on page I-7, acknowledges the existence of the Earth Sciences Preference Right Lease Application and describes how these minerals would be managed under all alternatives, including the Preferred Alternative. This management direction is carried into the PRMP in much the same manner as described therein. Refer to the sub-heading SOLID, NON-ENERGY LEASABLE MINERALS under the heading TOPICS NOT ADDRESSED IN THE PRMP, Chapter Two, in the PRMP for management of these minerals.

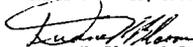
Mr. Bill Bottomly
 May 16, 1991
 Page 2

BLM will receive \$10 million per year or \$15,150 per acre per year for 100 years from products which will have a gross value of approximately \$50 billion, measured in 1991 dollars. Employment will increase by several hundred taxpayers in Hinsdale County and several thousand taxpayers at the processing site which will probably be in Montrose County. From this, the state and local governments will receive tens of millions of dollars in direct taxes and hundreds of millions of dollars in indirect taxes each and every year.

Earth Sciences, Inc. is confident that PRLA C-11418 will ultimately be approved. Failure to do so would simply be giving in to zealous, vocal minority special interest groups, thereby depriving all the people of the state and the nation of the economic benefits of their natural resource heritage.

This deposit is destined to be a significant part of Colorado's economy in the 21st century. It is our plea that you recognize this in whichever plan that is adopted. As you might surmise, our preference would be either Plan C, A or E in that order. More importantly, however, we ask that the plan recognize PRLA C-11418 as a natural resource treasure to be developed for the benefit of all of the people.

Sincerely,
 EARTH SCIENCES, INC.


 Duane N. Bloom, D.Sc.
 Chairman, Executive Committee

DNB/clz



EARTH SCIENCES, Inc.

Bx 261112
 Lakewood, Colorado 80226-1112
 (303) 977-2252
 17 May 91

Bill Bottomly, RMP Team Leader
 Bureau of Land Management
 2805 South Townsend Avenue
 Montrose, Colorado 81401

Dear Mr. Bottomly:

- 1 You must strengthen the protection of ecological values in the Gunnison Resource Area. The RMP/EIS inadequately addresses resource protection and the impact of livestock operations.
- 2 All of the Lake Fork River, from its headwaters in the Handies Peak proposed wilderness to Blue Mesa Reservoir, should be designated a Wild and Scenic River. Some of the most outstanding scenery found on BLM lands nationwide surrounds this river. The visual, geologic, recreational and biological values here must be preserved with Wild and Scenic status.
- 3 Habitat for bighorn sheep and the rare Uncompahgre Fritillary must be protected in an ACEC encompassing the Alpine Triangle. Without hesitation I state that protection of this area will result in protection for other potentially threatened and endangered species about which little is known--as is the case with the rare butterfly. ACEC designation is necessary for the entire Triangle to protect lands beyond the Lake Fork corridor.
- 4 Public lands immediately east of Gunnison are crucial deer and elk winter range. ACEC designation will protect them from the grazing abuses so prevalent in the area. ACEC designation of the Cebolita Creek area would protect bighorn sheep habitat and facilitate recovery of a self-sustaining population there.
- 5 BLM's intention to protect West Antelope Creek with ACEC designation is commendable.
- 6 The RMP/EIS must allow for riparian and range recovery in the Gunnison Resource Area. Livestock must be kept out of wetlands and riparian areas. Streambanks must be stabilized. Erosion and sedimentation due to livestock operations must cease to protect aquatic plants and animals and their habitats. Water quality must be restored and protected. Priority must be given to wildlife of all species for forage. The RMP/EIS must consider reducing livestock numbers in some areas and closing some abused allotments entirely. So-called "range improvements" such as chaining, roading, tank-building and etc must cease. The RMP/EIS must address these in great detail. If necessary, livestock operators will have to find alternative means of running their businesses to allow public lands in the GRA to return to health.

Sincerely,

 Tony Merten

Responses to letter 11

1. Please refer to the response to comment 3 of letter 8. Your comments concerning grazing management were considered in the development of the PRMP.
2. See the response to comment 1 of letter 8.
3. See the response to comment 2 of letter 8.
4. See the response to comment 3 of letter 8.
- 5 and 6. Wildlife improvement projects are described in STANDARD MANAGEMENT and in unit prescriptions for all alternatives in Chapter Three of the DRMP. Allocation of new, available forage for wildlife and livestock, and livestock grazing improvements, are discussed in greater detail in STANDARD MANAGEMENT in Chapter Four of the PRMP under those component headings. Rangeland improvement projects to meet management objectives of protecting and/or improving the range would be allowed. Individual projects would be further analyzed (generally with a cost-benefit analysis) in activity plans.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

1118 13th St. #552
Boulder, CO 80302
(303) 439-9303

12

Bill Bottomly, RMP TEAM LEADER
BLM
2805 S. Townsend Ave
Montrose, CO 81401

Dear Mr. Bottomly,

I am writing in regards to the Gunnison Resource Area. Although 60 areas have been included for ACEC status (Area of Critical Environmental Concern), please include the Alpine Triangle in its entirety, to protect areas outside the river corridor. The Alpine Triangle, of course, is the most popular BLM land in Colorado. It has numerous historical structures, Uncompahgre Fritillary butterflies, bighorn sheep, and the Stungullion Nat'l Natural Landmark.

Also, please include East Gunnison ^{and} Cebolla Creek, ~~as~~ as ACEC's East Gunnison provides critical deer & elk winter range. Improper/bad grazing management have caused problems here. Cebolla Creek (east of Powderhorn Primitive Area) provides bighorn sheep habitat. ACEC designation might allow a herd to be self-sustaining.

Thanks for including W. Antelope Creek as a proposed ACEC. This area provides critical elk, deer & bighorn sheep winter range.

Finally, please restrict motorcycles & jeeps to existing "roads" (trails). Please institute grazing practices that protect & improve riparian habitat, control sediment loss, & restore rangeland to good condition. (over)

12

We need a few more hiking trails, outside proposed wilderness, to accommodate increased public usage. Thanks for reading this letter.

Here's to proper land management,

Kurt Aronow
Kurt Aronow

Responses to letter 12

1. See the response to comment 2 of letter 8.
2. Thank you for your comment. It was given consideration in the formation of the PRMP.
3. See the response to comment 3 of letter 8.
4. There are about 70 miles of existing hiking trails on BLM managed lands in the Planning Area. Through participation by volunteer groups, we have managed to construct several new trails and perform major relocations on several trail segments. BLM will continue to seek out partnerships to work with and to provide for opportunities for hiking, trail riding, and mountain biking use.

The BLM must, however, according to mandates in the Federal Land Policy and Management Act (FLPMA), balance the desires of various interest and user groups on the public lands, in a multiple use framework and within fiscal realities.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Response to letter 13

Thank you for your letter.

13

5361 N. Post Trail
Tucson, Arizona 85715
May 21, 1991

Bill Bottomly - RMP Team Leader
BLM
2505 South Townsend Ave.
Montrose, Colorado 81401

Dear Sir:

Congratulations. You and your team have earned public respect and commendation for the draft Gunnison RMP/EIS. The list of qualified preparers and their years of experience is impressive.

I expect you were disappointed with the small attendance at the Lake City hearing on April 18 (as reported in Silver World May 3). Do not be discouraged --here in Arizona a symposium of experts explored many similar differences of opinion on uses of public lands (see attached news clipping).

I urge you to study "The Gunnison Country" by Duane Vanderbueche (Copyright 1980). This comprehensive history, written 10 years ago, portrays the pioneer family settlement, development, and use of your "Gunnison Resource Area" by the white man since 1870. Chapter 21 (p431 -445 Epilogue) summarizes past economic and ecological mistakes or limitations and predicts the intense and growing future demands and pressures for land and water use or export.

My family is a part of this area's history. Grandfather Mat Dwyer came to Capitol City and Lake City in 1875, then homesteaded on the Lake Fork north of Youman Station. Grandfather Andrew Doran came in 1902. Each raised their families/ die concern for miners, ranchers, loggers, merchants, school teachers, teamsters, and railroaders. My father, Bill Doran, was a pioneer U.S. Forest Service ranger; and my mother, Annie Dwyer Doran, served Hinsdale County as assessor for many years. I was born in Lake City in 1917 so am one of its few "natives", and am now a retired Coronado National Forest Supervisor living in Tucson.

Based on my memory of boyhood experiences with my Dad (Lake City and Ouray ranger districts) in the late 1920's and early 1930's it really is rather amazing that excessive livestock grazing and trailing on the fragile steep slopes of the alpine country did not completely destroy it. I believe Dad used to count about 60,000 driveway sheep (permitted to cross the national forest to reach the public domain). Similar numbers of "alloted" sheep also trailed thro the Big Blue Alpine Station corrals. . . Stan Whitney's remark at Lake City hearing about reducing the Ridge Stock Driveway use from 140,000 to 9,000 may be accurate.

13

During the summer of 1932 or 1933 (before the Taylor Grazing Act) I recall that Dad was requested by the Forest Service to check the sheep grazing on the public domain above Lake City and Ouray and interview owners or herders about their tenure and tie in with spring or winter range locations, etc. The numbers seemed staggering in those old days of first come - first serve. In July or August we counted 14 sheep camps on the American Flats proper---and the lands then were often a couple thousand head each.

Later at Colorado State University I studied forestry and range management, and worked on research projects for the Rocky Mountain Forest and Range Experiment Station or for Region 2 Forest Service Denver Office. You might be interested to see one of the early day score cards we developed for analysis of alpine sheep ranges (enclos)

I wish to go on record as favoring Management Alternative D --the most conservative use and environmentally protective measures of your draft proposal.

I recognize the BLM mandate for Multiple Use Management, but multiple use turns the corner and becomes land abuse when some of the land values are seriously reduced by one or more class of users. We all visualize western Colorado rapidly becoming a giant playground and campground. The value of its climate, scenic beauty, air, wildlife, and potential for pure water production appear to demand an overpowering (economic) choice for RECREATION as number 1.

After 100 years of resource damage (grazing, mining, logging, road building) land managers should have learned a great deal. Let's hope it will require less time to learn to avoid environmental damage from recreation use. The most important key factor is to protect the riparian habitat and the stream courses from erosion. Controlled and limited access roads must receive priority attention. I suggest that government agencies like yours manage people more. Managing the resource needs this incentive. How to sell it to the people is a challenging task. Good luck.

Sincerely yours

Clyde W. Doran
Clyde W. Doran

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

14

Responses to letter 14

1 and 2. See the responses to comments 1 and 2 of letter 8, respectively.

Bill Battonly, RSP Team Lead
Bureau of Land Management
2805 South Townsend Ave.
Montrose Co Wtco
May 25, 1991

Dear Sirs

Thank you for developing a Resource Management Plan for the Gunnison River Area. I have spent a life enjoying outdoor activities and I am grateful BLM recognizes the importance of recreation on public lands. The following are some comments on this plan.

- 1. Designate the Lake Fork of the Gunnison as a Wild and Scenic River because of its visual, geologic and recreational value. Some of the most outstanding scenery anywhere is on this stretch of the Gunnison.
- 2. The East Gunnison is important deer and elk habitat and the area should be designated as Area of Critical Environmental Concern (ACEC).

14

- 2. The Cottonwood Creek just east of the Powderhorn Primitive Area is important bighorn sheep habitat and should have a ACEC designation.

Sincerely
Bill Battonly
827 Maxwell Ct
Boulder Co 80304

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 15

1 through 4. See the responses to comments 1 and 2 of letter 8, comment 4 of letter 12, and comment 3 of letter 8, respectively.

15

23 May 1991
P.O. Box 681
Crested Butte
CO 81224

Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Bottomly:-

I am writing you to encourage your support of several issues currently under BLM consideration.

1 Firstly, I would encourage you to grant at least of the Lake Fork Wild & Scenic protection. A number of valuable resources could easily be lost, going the way of such rivers as the Gunnison River, if not protected.

2 Secondly, there are four areas that deserve ACEC designation: 1) The Alpine Triangle needs such designation to preserve riparian & "river corridor" lands. 2) East Gunnison, along Tomahawk Ct., & 3) West Antelope Ct. deserve ACEC designation not only because of the well known elk & deer range. And 4) Cebolla Ct. deserves the designation because of the important bighorn range. These animals are having a difficult enough time with heartworm and limited range.

3 Lastly, I would encourage greater use of some BLM lands with the construction of more biking & hiking trails. I would also encourage better grazing policy in such areas as the State River Valley near Crested Butte.

4 Thanks for your consideration - Sincerely,
Dennis B. Hall

Responses to letter 16

1 through 4. See the responses to comments 1 and 2 of letter 8, comment 4 of letter 12, and comment 3 of letter 8, respectively.

Andrew McKinley
5590 Berkeley Av.
Boulder, CO 80303
5/22/91

16

Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 S. Townsend Ave.
Montrose, CO 81401

Here are my comments on the draft RMP/EIS for the Gunnison Resource Area:

1 I disagree with your finding that the Lake Fork of the Gunnison River is not suitable for protection under the Wild and Scenic Rivers Act. Rather, I believe the entire length of the Lake Fork should be designated as one category or another under the act. The scenery is magnificent, especially in the upper portion; while the downstream portion could well be recognized under the Act for its popular use by rafters and fishermen.

2 The Alpine Triangle needs protection as an ACEC because it is a frequently visited and sensitive area. Particularly sensitive features include Uncompahgre fritillary butterfly habitat, bighorn sheep habitat, fragile alpine plant communities surrounding the three 14,000 foot peaks of especial attraction to visitors, and various historical structures. The entire Alpine Triangle should be given very special consideration.

1/2

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

16

- 2 ACCE designation of the lands immediately east of the town of Gunnison could show real commitment to active grazing management that would reverse the degradation of critical winter range for deer and elk that has occurred here in the past. Above all, please
- 3 fence cattle out of riparian corridors.

Thank you for using ACEC designation to protect winter range for deer, elk, and bighorns at West Antelope Creek

- 4 There are plenty of roads and trails in existence already. Please prohibit cross-country travel by motorized vehicles and enforce this prohibition.

Andrew McLaughlin

2/2

2202 East 35th Street
Tulsa, OK 74105
May 25, 1991

Mr. Bill Bottomly
Bureau of Land Management
2505 South Townsend Ave.
Montrose, CO 81401

RE: Wild and Scenic River Study

Dear Mr. Bottomly:

I have reviewed the Gunnison Resource Area Resource Management Plan and Environmental Impact Statement draft of March, 1991. If I correctly understand the various aspects of the Plan I certainly agree with the BLM recommendation that the 13.3 mile Segment A of the Lake Fork of the Gunnison River should not be included into the National Wild and Scenic Rivers System.

I understand the reason for this portion meeting the eligibility requirements and as a property owner within Segment A I am interested in preserving the outstanding scenic value without any adverse effect on the environment. It appears to me from the report that the BLM already has sufficient authority for these resources through current management policy.

The analysis in Appendix I of the overall report sets forth proper and rational reasons for the BLM determination. However, if at some future date this determination is reversed I would like to make a specific request to exclude our property from Segment A designation. Our property consists of a 40 acre tract and two mill sites that join the west side of Wager Gulch. We completed construction of a full log home in the Spring of 1990, built a 1/4 mile private road and a two acre pond along with all the amenities to make a home worthy of the property at a cost significantly higher than what is outlined in paragraph 5 on page I-12. It would not make sense to me for the government to desire to purchase such an expensive property since it joins Segment B which was not found to be eligible because it did not meet either criteria for eligibility under the Wild and Scenic River Act.

Although I feel confident your position as outlined in the report will be the final determination I just wanted to respond to you as a matter of record.

I appreciate your sending a copy of the draft and for putting me on your mailing list for future information on this matter. The report has been very enlightening. We certainly have a vested interest in the area and are looking forward to enjoying our time in the Rocky Mountains.

Sincerely,

Wendell L. Zachary
Wendell L. Zachary

Response to letter 17

- 1. Your opposition to any form of designation under the Wild and Scenic Rivers system is noted. If a recommendation is ever made to include Segment A into the Wild and Scenic Rivers System, it would probably not be possible to exclude from the corridor private lands that are immediately adjacent to the river. However, it is important to note that existing private property rights would not be affected if this river segment is designated. See Appendix I, page 13 of the DRMP.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 18

18

1 through 6. Please see the responses to comment 4 of letter 12, comments 1 and 2 of letter 8, comment 2 of letter 12, and comment 3 of letter 8, respectively.

2970 Leyden St.
Denver, CO 80207

Mr. Bill Bottomly
RMP Team Leader
Bureau of Land Management
2605 South Townsend Avenue
Montrose, CO 81401

May 24, 1991

Dear Mr. Bottomly:

I would like to take this opportunity to express some concerns that I have with regard to the Draft Resource Management Plan and Environmental Impact Statement which has recently been released by the BLM for public response.

1 In general, I feel that the draft does not sufficiently protect the Gunnison Resource Area's high scenic and ecological values. Also, due to increased user interest, additional recreational trails are needed.

In particular, I would like to make the following statements:

2 WILD AND SCENIC RIVERS

Because of its unique characteristics and potential for visitor use, the Lake Fork of the Gunnison River deserves Wild and Scenic designation from its origin at Sloan Lake and throughout its course to Blue Mesa Reservoir.

3 AREAS OF CRITICAL ENVIRONMENTAL CONCERN (ACECS)

Additional areas which require special management not included in the draft are the Alpine Triangle, East Gunnison, Cebolla Creek and West Antelope Creek areas. All of these areas are important wildlife habitats that merit inclusion into the ACEC designation.

RECREATION MANAGEMENT

Increased use of the Gunnison Resource Area by outdoor

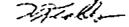
18

4 enthusiasts implies that management strategies be developed and implemented accordingly. The construction of more single-track trails outside of the proposed wilderness boundaries is needed in order to accommodate increased visits by hikers and mountain cyclists. In addition, due to the serious degree of negative environmental impact that they may cause, motorcycles and jeeps must be required to remain on established routes designated for their use.

6 GRAZING MANAGEMENT

Modifications to current grazing practices on areas within the Resource Area are needed to ensure protection of the rangeland and its associated riparian habitats. Enforcement of grazing management techniques which promote restoration of over-grazed or inappropriately used areas should be effected.

I appreciate your sincere attention to my concerns and suggestions, and trust that you will take them into account during the public response period.

Sincerely,

Thomas Keables

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 19

May 23, 1991
2880 Stephens Rd 19
Boulder, CO 80303

Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 South Townsend Avenue
Montrose, CO 81401

Dear Mr Bottomly,

I am writing to you regarding the BLM's recently released draft Resource Management Plan and EIS for the Gunnison Resource Area in Hinsdale, Gunnison, Saguache, Montrose and Ouray Counties. The Draft Plan as it is does not include some very important aspects that would protect the ecological integrity and beauty of the regions discussed. Please take into consideration my following suggestions:

- 1 ALL of the LAKE FORK of the Gunnison from its origin at Sloan Lake in the Handies Peak proposed wilderness to Blue Mesa Reservoir deserves Wild and Scenic protection.
- 2 Please include the following areas in the official Areas of Critical Concern: the Alpine Triangle, the East Gunnison, Cebolla Creek, and West Antelope Creek.
- 3 Please construct more single track trails outside of proposed wilderness areas to accommodate increased hiking and mountain bicycling demands in the area. Please insure that motorcycles and jeeps be restricted to existing trails at all times.
- 4 Please institute grazing management practices that protect and improve riparian habitat, control sediment loss, and restore the rangeland to good condition.

Sincerely,
Virginia Lyson

1 through 5. See the responses to comments 1 and 2 of letter 8, comments 4 and 2 of letter 12, and comment 3 of letter 8, respectively.

May 28, 1991

20

Bill Bottomly
RMP Team Leader
Bureau of Land Management
2505 South Townsend Ave.
Montrose, Co 81401

Dear Mr. Bottomly:

This letter is in response to the Draft Gunnison Resource Management Plan/Environmental Impact Statement.

The management of American Basin to exclude sheep grazing would not be in the best interests of it's scenic value.

First, the reason the wildflowers are so abundant is largely due to the grazing history of the basin. Historical use has degraded that area into what it is today. Undesireable forage plants such as larkspur, sneezeweed and thistle have invaded the area and contribute to it's beauty.

The sheep use today has been drastically reduced and at present contributes to the scenic values by:

- 1) Trimming back the forbs and cleaning out old vegetation promotes vigor and health of the wildflower. Plants not grazed tend to get old produce less flowers and less seeds.
- 2) Planting seeds during late season grazing by hooves pressing them into the mud.
- 3) Producing large amounts of excellent fertilizer which promotes soil building and provides minerals for plant use.

Scenic areas need good management. Sheep should stay out of the bottom during the flowering season. Good permittees would do this anyway because of the loss from sneezeweed during this time. Late season grazing is healthy and beneficial. Once every four or five years, light grazing should be done as early as possible in the season.

Excluding sheep entirely from the basin would be detrimental to future scenic values. Grazing should be continued but carefully managed to enhance and protect wildflowers.

Do limit grazing on very steep slopes. Damage can occur on the steep slopes even when grazed with proper numbers for the forage. At least do not open steep areas to grazing which have not previously been grazed.

Also in favor of sheep grazing, many people thoroughly enjoy seeing the bands and herders in the high country. Many times I have watched tourists taking photos of the animals. When sheep come off the trucks people stop with cameras and questions. They consider it a

Response to letter 20

1. Thank you for the comment. Upon reconsideration of this and similar comments, the BLM has modified the recommendation to eliminate domestic livestock grazing in this unit. In the PRMP, domestic sheep grazing would be authorized in unit 4, in such a manner as to avoid conflicts between recreationists and livestock. Specific details would be incorporated into the overall activity plan that would be prepared for Management Unit 1. Changes in season of use, restrictions as to where livestock would be permitted, or elimination of grazing in some areas could be utilized. Visitor brochures would be published, and interpretive signs would be installed at American Basin that would include positive messages about grazing. Please refer to the prescription for Management Unit 4 in Chapter Four of the PRMP to see how livestock grazing would be managed in that area.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

-2-

20

special privilege to watch them unload.

On the subject of ATV's, please limit their areas and use. They have their place but their place is not everywhere. Resource protection, rider safety, and the safety of other land users need to be carefully analyzed. Consider this a no vote on ATV use in the alpine areas.

Thank you for the opportunity to give input into the plan for the area.

Sincerely:

Edna Mason
Edna Mason

425 N. Hanson St.
Lake City, CO

5-27-91

21

Box 938
Buena Vista, CO 81211

Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 S. Townsend Ave.
Montrose, CO 81401

Dear Sir,

Please consider these comments on the draft RMP/EIS before making the final plan.

1 The plan does a good job in recommending the six ACECs (especially the West Antelope Creek Area) but needs to include three others based on their scenic, historic, biological and recreational characteristics: East Gunnison, Cebolla Creek, and The Apline Triangle.

2 Also, the Lake Fork of the Gunnison River, from Sloan Lake to Blue Mesa needs some level of Wild and Scenic River protection.

Thank you.

Sincerely,

Jeffrey Keidel
Jeffrey Keidel

Responses to letter 21

1 and 2. See the responses to comments 2 and 1 of letter 8, respectively.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Response to letter 22

22

Mike Stabler
130 S. 33rd St.
Boulder, CO 80303

May 27, 1991

Mr. Bill Bottomly, RMP Team Leader
BLM
2805 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Bottomly:

I'm concerned about the big gaps in your agency's draft RMP/EIS. When will the BLM stand up for that which is irreplaceable, that which has more value than any allotment, any timber stand, any mineral deposit? WE NEED MORE WILDERNESS!!!!

1 Please include the Alpine Triangle, Cebolla Creek, West Antelope Creek, and the East Gunnison area in your final plan. I've visited all of these areas, and especially love the high mountain areas.

Additionally, I want you and your agency to take a much harder line with grazing permittees. Concerned environmentalists have recently formed the Public Lands Action Network, designed to stop the destruction of current grazing policies. We've made a presentation at a Routt NF meeting of permittees, and are available for similar meetings in your area. Please let me know if you are interested in more information.

Thank you in advance for your consideration. I appreciate your making this letter a part of any appropriate public record.

Sincerely,

Mike
Mike Stabler

- 1. See the response to comment 2 of letter 8.

Responses to letter 23

23

Dear Mr. Bottomly,
1 I would like to comment on the draft of the East Gunnison Area. I would like to see all of Lake Fork receive wild & scenic protection, because of the visual, geologic & recreation values this area has to offer.
2 Please provide ACEC designation for the entire alpine Triangle as well as for East Gunnison, Cebolla Creek, & West Antelope Cr. because of the need to protect wildlife & scenic habitat.
3 I support more single track trails out of proposed wilderness areas, I strongly insist that motorized vehicles be restricted to existing trails at ALL times. I support a grazing management program that is enforced. Much of the rangeland is in poor condition. This must be corrected & prevented.
5 Sincerely, Kelley Luntio, M.S.R.D.

- 1 through 5. See the responses to comments 1 and 2 of letter 8, comments 4 and 2 of letter 12, and comment 3 of letter 8, respectively.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES



Colorado Chapter of The Wildlife Society

24

31 May 1991

Bill Bottoaly, RMP Team Leader
Bureau of Land Management
2505 South Townsend Avenue
Montrose, Colorado 81401

R.E. Gunnison Resource Area, Resource Management Plan and
Environmental Impact Statement

Dear Sir:

We would like to compliment the Bureau on their efforts on the development of a Resource Management Plan (RMP) for the Gunnison District of Colorado. The result represents a thorough understanding of the challenges and provides a working plan to guide future management of public lands.

After reviewing the Draft RMP and Environmental Impact Statement (EIS), however, we are still very concerned about several aspects regarding the RMP. Most of our concerns deal with Alternative E, the preferred alternative.

Standard Management For Alternative E

1 We are concerned that a 20 foot buffer zone for commercial timber harvest along riparian areas might be inadequate. The Wyoming BLM has adopted a 500 foot No Surface Occupancy stipulation for oil and gas exploration along riparian zones. We feel that commercial timber harvest can and should receive the same consideration. This is especially important since such of the crucial deer and elk winter range in Appendix A occurs along riparian areas.

2 A similar concern is that reforestation of harvested areas will occur only as funds become available. With fluctuations in federal budgets what they are, we feel it would be more appropriate to include reforestation costs in the planning of timber management and commercial timber sales. This will insure that disturbed areas are reclaimed in a timely manner.

3 We feel that the section dealing with disposal of Category I lands should be re-evaluated. Many of the Category I lands might be better traded for lands of equal net value that are adjacent to BLM lands. If this is implied in the RMP, it is not readily apparent.

Responses to letter 24

1. The professional judgement of BLM is that the 30 foot buffer is adequate in most cases. During the preparation of environmental assessments for proposed timber sales, consideration for special resource needs, including wildlife needs, would be evaluated. Wider buffers may be required in some cases to protect resource values.
2. The reforestation referred to in the DRMP is backlog reforestation, and refers to old units that were deforested by logging, fire, and forest pests that occurred approximately 20-30 years ago. Current harvesting methods allow for reforestation by natural methods with no additional funds necessary. If natural regeneration would not be successful, the other means would be used. The PRMP includes this distinction.
3. Category I lands could be considered for exchange. For information regarding these tracts, please refer to the description of Category I lands in the Disposal of Public Lands section of Standard Management in Chapter Four of the PRMP, or on page 3-108 in the DRMP.
4. Currently, snowmobile use on crucial elk and deer winter range in the Planning Area occurs south and west of Lake City. This use is not impacting wintering big game. If monitoring indicates that winter vehicle traffic is resulting in impacts to wintering big game, OHV designations can be changed through the RMP amendment process.
5. In the judgement of BLM, nesting sage grouse in the Planning Area would be protected by the standard lease terms and conditions that permit BLM to delay oil and gas related surface disturbing activities for a 60-day period, or to move proposed areas of disturbance a distance of 200 meters.
6. The concerns in the unit in the comment have been addressed in the riparian, livestock grazing, and other sections of STANDARD MANAGEMENT of the PRMP, and in management of the various resources in the unit. These concerns are tied in directly to the issues addressed in the RMP. In the judgement of BLM, ecological condition should begin to improve with the implementation of these varied management actions. Please note the clarifications made to the STANDARD MANAGEMENT in the PRMP, especially in Livestock Grazing Management.

24

Selected Specific Management Unit Prescriptions

4 Management Unit E-1: We are concerned that winter vehicle traffic, specifically snowmobiles, may produce conflicts with crucial deer and elk winter range.

5 Management Unit E-11: We are concerned that there is not a timing requirement for the No Surface Occupancy Stipulation within 1/4 mile of sage grouse leks. The Wyoming BLM has incorporated a timing stipulation from February 1 to July 31 into the Finedale RMP Final EIS (Appendix C-1, page 195). So that the nesting area around the strutting ground can be protected, surface development will be allowed within 1 3/4 miles from the 1/4-mile protection zone only between 31 July and March 1.

6 Management Unit E-13: We are very concerned with the management prescription for this unit. Among the stated concerns for this unit are "... heavy-to-severe utilization of some riparian vegetation, ..., stream channel and stream bank erosion and instability ..., total forage production being far below potential, ..., Recreation users causing livestock control and management problems ...". wording in this section indicates that most problems are associated with livestock grazing in this unit. However, it is not apparent that any change in management or grazing allotments is being made. We feel that this section should be re-analyzed and changes should be made to "... improve ecological conditions." This should receive a high priority due to the fact that Management Unit E-13 encompasses nearly 1/3 of the total area of concern.

Thank you for the opportunity to comment on this document. The Colorado Chapter of the Wildlife Society would be glad to provide help in your review and revision of the final document. Please send any future correspondence regarding this issue to:
Colorado Wildlife Society
824 E. 22nd Avenue
Denver, CO 80205

Sincerely,

Linda Sikorowski

Linda Sikorowski
President
Colorado Chapter of the Wildlife Society

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

To Whom It May Concern:

25

- I would like to urge you to recommend the Lake Fork of the Gunnison River as "Wild & Scenic" suitable. Also, ~~also~~ I would urge you to give ACEC designation to Goshute Creek, W. Antelope Creek, E. Gunnison and the Alpine Triangle. (in addition to the ACEC's already recommended)

Thank you, Sincerely,

Jon Siric's 2898 Bluff # 492, Boulder, CO 80501

Responses to letter 25

1 and 2. See the responses to comments 1 and 2 of letter 8, respectively.

Dear Sir,

26 5/28/91

I'm writing today because I've heard of your recently released draft of Resource Management Plan and the Environmental Impact Statement in the Gunnison area.

Unfortunately, the draft plan doesn't really do enough to protect the area's high scenic and ecological values. It seems we must do more to protect the wilderness we have as well as provide proper trails

- 1 since people are more & more becoming aware of the scenic beauty that wild places offer. The Lake Fork shall be designated wild & scenic. The river offers so much from geological characteristics to camping & fishing.

- 2 Also, Areas of Critical Environmental Concern should be expanded. Areas include the alpine tundra - the area is heavily visited as well as being big horn sheep habitat

Responses to letter 26

1 through 3. See the responses to comment 4 of letter 12, and comments 1 and 2 of letter 8, respectively.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Handwritten:
M. L. B. Bottomly 26

27

Responses to letter 27

1 through 5. See the responses to comments 1 and 2 of letter 8, comments 4 and 2 of letter 12 and comment 3 of letter 8, respectively.

May 25, 1991

Mr. Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 South Townsend Avenue
Montrose, CO 81401

Dear Mr. Bottomly:

This letter is in response to the release of the draft Resource Management Plan and Environmental Impact Statement for the Gunnison Resource Area. We believe this report is inadequate in several areas. Among the deficiencies is the lack of Wild and Scenic protection for ALL of the Lake Fork from its origin at Sloan Lake in the Handies Peak proposed wilderness to Blue Mesa Reservoir. This river has many outstanding recreational, geologic and visual values which need to be preserved and enhanced for future generations.

1

In addition to the six Areas of Critical Environmental Concern (ACEC) recommended in the draft plan, we feel four other areas need to be added to the list. These are: Cebolia Creek, for the protection of the important bighorn sheep habitat; East Gunnison, as a crucial deer and elk winter range and to correct improper grazing management; West Antelope Creek, for its crucial elk, deer and bighorn sheep winter range and the significant paleontological site of Haystack Cave; and finally, the Alpine Triangle. The entire Alpine Triangle must be included to protect the lands outside the river corridor, specifically the numerous historical structures, habitat for the rare Uncompahgre Fritillary butterfly, the Siumgullion National Natural Landmark, important bighorn sheep habitat and three 14,000 foot peaks.

2

The BLM needs to construct more single track trails outside of proposed wilderness areas to accommodate the increased hiking and mountain bicycle use in the area. Jeep and motorcycle use must be restricted to existing trails at all times and not be allowed in these sensitive areas.

3

4

Finally, the BLM must institute grazing management practices that protect and improve the riparian habitat, control sediment loss and restore the rangeland to good condition. Much of the rangeland in the Gunnison Resource Area is in poor to fair condition due to inappropriate grazing and over-grazing. We need to improve this area for all and not allow it to be abused by a select small group.

5

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

27

Thank you very much for your attention to these issues and we hope to see an improvement in the RMP/EIS for this beautiful and important area in Colorado.

Sincerely,

Claudia Hogue
Claudia Hogue
7474 E. Arkansas Ave. #2108
Denver, CO 80231

Robert L. Tolfree
Robert L. Tolfree

28

Response to letter 28

Thank you for your letter.



US Department
of Transportation
Federal Highway
Administration
Region Eight

Colorado Division
555 Zeng Street, Room 250
Lakewood, Colorado 80228
May 28, 1991

Mr. Bill Bottomly
Bureau of Land Management
2505 South Townsend Avenue
Montrose, Colorado 81401

Re: Draft EIS
Gunnison Resource Area

Dear Mr. Bill Bottomly:

The Colorado Division would like to thank the Bureau of Land Management for the opportunity to review and submit comments regarding the subject documents.

The Division has no comments regarding the contents or impact assessments.

Sincerely yours,
Marvin L. Osborn

Marvin L. Osborn
George H. Osborne
Division Administrator

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 29

29

1 through 4. See the responses to comments 1 and 2 of letter 8, comment 2 of letter 12, and comment 3 of letter 8, respectively.

David Christenson
636 Walden
Boulder, CO 80303

May 29, 1991

Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 South Townsend Ave.
Montrose, CO 81401

Dear Mr. Bottomly:

I am writing to comment on the draft Resource Management Plan and Environmental Impact Statement for the Gunnison Resource Area in south/ central Colorado. In short, as a recreational user of the area, I believe the draft plan does not adequately protect environmental and non-motorized recreational values.

- 1 First of all, all of the Lake Fork of the Gunnison River, from Sloan Lake to the Blue Mesa Reservoir should be protected as a Wild and Scenic River. The existing natural and recreational values of the river are adequate to justify such protection.
- 2 Second, additional "Areas of Critical Environmental Concern" (ACECs) should be included in the final plan. Areas which are not designated ACECs in the draft plan, but which should be included in the final plan include: all of the Alpine Triangle, BLM lands immediately east of the town of Gunnison, Cebolla Creek- east of the Powderhorn Primitive Area, and West Antelope Creek. All of these areas are existing wildlife habitat which should be preserved. Also I am strongly opposed to any increases in jeep and motorcycle trails. Existing trails are entirely adequate, and motorized vehicles should be limited to them at all times.
- 3 Finally, I believe BLM could do a much better job of grazing management than it has in the past. It is not our responsible resource management to destroy riparian habitat and increase erosion through poor grazing management.
- 4

Thank you for your consideration.

Sincerely,
David Christenson
David Christenson

Responses to letter 30

30

1 through 4. See the responses to comments 1 and 2 of letter 8, comments 4 and 2 of letter 12, and comment 3 of letter 8, respectively.

May 28, 1991

Mr. John K. Maurus
1301 Asbury Avenue
Winnetka, IL 60093-1458

Mr. Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Bottomly:

I am writing with regard to the recently released draft of the Resource Management Plan and Environmental Impact Statement (RMP/EIS) for the Gunnison Resource Area in Hinsdale, Gunnison, Seguache, Montrose, and Ouray Counties. I would like to offer the following comments or suggestions for changes and additions for the final RMP/EIS:

- 1 1. The Lake Fork of the Gunnison River should be designated as a Wild and Scenic River. This protection should be afforded to all of the Lake Fork.
- 2 2. The entire Alpine Triangle should be designated as an Area of Critical Environmental Concern (ACEC).
- 3 3. The East Gunnison, Cebolla Creek, and West Antelope Creek areas should be designated as ACECs.
- 4 4. There should be construction of more single track trails on BLM lands outside of proposed wilderness areas to accommodate hiking and mountain bicycling. Motorcycles, Jeeps, and other motorized vehicles should be restricted to existing trails at all times.
- 5 5. The BLM should institute grazing management practices that protect and improve riparian habitat, control sediment loss, and restore rangelands to good condition.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

30

Mr. Bill Bottomly

-2-

5-28-91

Thank you for your attention.

Very truly yours,

John K. Maurus
John K. Maurus

THOMAS P. AND CAROL W. QUINN
1605 S. WEST STREET
LACROFT, CO 81452

31

May 21, 1991

Mr. Bill Bottomly, RMP Team Leader
Bureau of Land Management
2895 S. Townsend Avenue
Boulder, CO 80501

Re: Draft Resource Management Plan and Environmental Impact Statement for the Gunnison Resource Area in Hinsdale, Gunnison, Saguache, Montrose and Ouray Counties.

Dear Mr. Bottomly:

We would like to express our opinion on several aspects of the draft RMP/EIS for the Gunnison Resource Area:

- 1. **ALL OF LAKE FRANK** (from its headwaters at Stone Lake to Rice Base Reservoir) should be designated as a Wild and Scenic River. As of now, only 2-4 % of all rivers carry this special designation. We need to protect this critical habitat NOW and not have to deal with the consequences later down the road. The spectacular scenery, geological features and recreational values (fishing, rafting, etc.) need to be protected for our future generations to enjoy and learn from.
- 2. In addition to the six ACECs that have been proposed in the draft, please recommend these other areas as ACECs:
 - a. **The Alpine Triangle:** By declaring the Lake Park River as a Wild and Scenic River, the areas adjacent to the river will be protected. However, areas outside the river corridor will not be adequately protected. It is critical to declare this entire area as an ACEC in order to maintain a healthy, well balanced ecosystem. Additionally, the numerous historical structures, the rare *Wassonpogon* Primitively butterfly and three 14,000 foot peaks (Hawdick, Quashnet, Redcloud) which lay in this area will directly benefit from this special status as it is one of the most popular and heavily used areas managed by the BLM.
 - b. **East Gunnison:** Since this area west of the town of Gunnison is critical deer and elk winter ranges, we need to protect this area as an ACEC. This riparian ecosystem has been significantly altered by improper grazing management techniques over the past several years.
 - c. **Cobalto Creeks:** By designating this area as an ACEC, we will facilitate recovery efforts to bring the bighorn sheep population back up to self-sustaining levels.
- 3. Please consider contracting more hiking trails outside the proposed wilderness area to accommodate increased hiking and mountain biking demands. Also, PLEASE RESTRICT MOTORCYCLES AND JEEPS TO EXISTING TRAILS AT ALL TIMES.
- 4. Please revise your current grazing management practices to protect and improve the riparian habitat, control sediment loss and restore the rangeland back to its natural, healthy condition.

Thank you for your consideration of our comments.

Carol W. Quinn
Carol W. Quinn

Thomas P. Quinn
Thomas P. Quinn

Responses to letter 31

1 through 5. See the responses to comments 1 and 2 of letter 8, comments 4 and 2 of letter 12, and comment 3 of letter 8, respectively.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

21 May, 1991

32

Responses to letter 32

Thomas L. Holderfield
HOB - Room 1170
P.O. BOX 840
Denver, CO 80201-0840

1 through 5. See the responses to comments 1 and 2 of letter 8, comments 4 and 2 of letter 12, and comment 3 of letter 8, respectively.

Bill Bottomly
RMP Team Leader
Bureau of Land Management
2885 South Townsend Ave.
Montrose, CO 81401

Sir:

The recently released draft Resource Management Plan and Environmental Impact Statement for the Gunnison Resource Area in Hinsdale, Gunnison, Saguache, Montrose, and Ouray Counties DOES NOT DO ENOUGH to protect the area's high scenic and ecological values, nor does it provide additional recreational trails to meet the continually increasing demand in the area.

1 | The Lake Fork of the Gunnison should have been designated as a Wild and Scenic River. This river, which flows through the heart of the Alpine Triangle Special Recreation Management Area, has many outstanding visual, geologic, and recreational values that need to be preserved and enhanced for future generations to enjoy. The headwaters of the Lake Fork downstream to Lake San Cristobal offer some of the most outstanding scenery found on BLM lands nationwide! The river corridor includes excellent geological characteristics, most notably the Slungullion Slide National Natural Landmark. The downstream end of the Lake Fork below Red Bridge Campground is a popular rafting and fishing stretch and contains the beginnings of the Black Canyon of the Gunnison. All of the Lake Fork, from its origin at Sloan Lake in the Handies Peak proposed wilderness to Blue Mesa Reservoir, deserves Wild and Scenic Protection.

2 | In addition to the six areas recommended in the plan for ACEC designation, the following areas should be designated ACECs as well: 1) The Alpine Triangle is a highly scenic area which needs protection in order to protect the lands outside the Lake Fork river corridor which would be protected by Wild and Scenic designation. This area is the most popular and heavily visited area the BLM manages in Colorado, and is among the most scenic areas in the nation. Specific values that need protection are: numerous historical structures, habitat for the rare Uncompahgre Fritillary butterfly, three 14,000 foot peaks, bighorn sheep habitat, and Slungullion National Natural Landmark. 2) The BLM lands immediately east of the town of Gunnison (East Gunnison) are crucial deer and elk winter range. The riparian zones found here

32

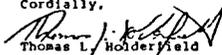
2 | have been heavily impacted by improper grazing management. 3) The Cebolla Creek area, just east of the Powderhorn Primitive Area, is important bighorn sheep habitat. ACEC designation would facilitate efforts to recover the herd to a self-sustaining population. 4) I compliment the BLM for proposing the West Antelope Creek area for ACEC designation. The area is crucial elk, deer, and bighorn sheep winter range and includes Haystack Cave, a significant paleontological site.

3 | I encourage the BLM to construct more single track trails outside of proposed wilderness areas to accommodate increased hiking and mountain biking demands in the area. Motorcycles and jeeps must be restricted to existing trails at all times!!!

5 | Much of the rangeland in the Gunnison Resource Area is in fair or poor condition because of inappropriate grazing and over-grazing in the past. The BLM must institute grazing management practices that protect and improve riparian habitat, control sediment loss, and restore the rangeland to good condition.

Thank you for your time and consideration of my comments.

Cordially,


Thomas L. Holderfield

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

BLUE MESA FOREST PRODUCTS, INC.

33

P.O. BOX 460
MONTROSE, COLORADO 81402
PHONE 303-249-0812

11925 - 6530 RD.

May 29, 1991

Bill Bottomly
Bureau of Land Management
2465 South Townsend Avenue
Montrose, CO 81401

RE: RMP/EIS 1616/130

Dear Bill:

Under the forest management section, you name three purchasers, two of which utilize mixed conifers for their mills - Blue Mesa Forest Products and Ray Lumber. Further, you mention our demand is 1,000 MBF per year.

1 Since Ray Lumber has moved the mill to town and improved the production for construction material, the 1,200 volume in your ALT. E (preferred ALT.) is very low. Blue Mesa has also invested in new equipment to increase production. The 1,200 MBF per annum is only 50% of the current demand.

Another factor for you to consider is, that with the reduction of timber supply on the Rio Grand N.F., purchasers from the San Luis Valley increase the demand in the Gunnison Basin. The B.L.M. should, therefore, offer 4 to 5 million board feet of Conifer annually.

Thank you for the opportunity to respond.

Sincerely,

Kirt Darner
Kirt Darner
Forester

KD:laf

Responses to letter 33

1. By law, timber management on public lands is carried out on the basis of sustained yield production. To meet this mandate, BLM could only potentially offer 1,200 MBF annually for harvest in the Planning Area. Sustained yield production would not allow for the cutting of 4-5 million board feet per year. Actual amounts offered for sale or disposal would depend on BLM staffing capabilities, management priorities, and other factors.

June 3, 1991

Response to letter 34

Dear Mr. Bottomly,

34

May I please make some comments regarding the upcoming RMP/EIS for the Gunnison Resource Area.

1 As a concerned resident of this area I have had occasion to notice the state of public lands used for grazing. Many areas show signs of over use, especially in riparian zones. Greater use of wildlife exclosures and reduced A.U.M's would be helpful in many allotments.

Please explore all avenues the BLM has available to increase the diversity and productivity of our public lands.

Thank you for your time and consideration.

Sincerely,

J.P. Wingate
J.P. Wingate

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

RALPH E. CLARK III
519 EAST GEORGIA AVENUE
GUNNISON, COLORADO 81230
(303) 641-2967

35

May 30, 1991

Responses to letter 35

1. Thank you for the comment and the sources of further information. An index was considered, but was not included.
2. Updated population data and most of the economic data that was published in the DRMP is included in Appendix E in this document.
3. The information referenced in the comment is, generally, the latest information available. The table has been updated in the PRMP as much as was possible.

Mr. Bill Bottomly
RMP Team Leader
Montrose District
Bureau of Land Management
2505 South Townsend Ave.
Montrose, Colorado 81401

Re: Comments on the Draft Gunnison Resource Management Plan / Environmental Impact Statement

Dear Mr. Bottomly:

Thank you for the opportunity to review the Draft Gunnison Resource Management Plan / Environmental Impact Statement (RMP/EIS). The following comments are made from my personal perspective after reading the RMP/EIS, considering it and other relevant materials, and listening to public discussion. I appreciated the opportunity to attend the hearing and open house on the management plan held in Lake City, Colorado, on April 18th. Some of my comments elaborate on things I mentioned at this hearing.

OVERVIEW

Once the reader becomes accustomed to the pattern of the analysis, the document is well organized and the summaries are particularly useful. Presenting management alternatives for identifiable units and special areas offers is helpful to others considering what might happen in particular locations of concern. The cellular or "cross-reference" form of impact analysis of alternatives appears well suited to the task.

Providing a subject index would be particularly helpful given the structure of the document. The bibliographic references appear somewhat limited and dated. Below are suggested sources of further information that might be helpful in preparing the final RMP and EIS.

35 page 2

GENERAL COMMENTS:

(references are to pages in the RMP/EIS unless otherwise stated)

1. Where possible, the RMP/EIS should use current information. The 1990 census figures should be used and projections for the future should reflect 1990 results (p. 2-2, Figure 2-1).
 - a. The figures given in Table B-5 for livestock grazing, season of use, and range condition appear to be taken from the 1987 Gunnison Basin / American Flats Planning Areas Rangeland Program Summary Update published by the Montrose District. Because much of the public discussion is focused on grazing, more current information is needed.
 - b. More current information should be available and should be incorporated into discussions of recreation use, water quality, large scale projects, and social and economic conditions. Some suggested sources are: Upper Gunnison - Uncompahgre Basin Phase I - Feasibility Study Final Report and associated task reports; the Department of Energy's and contractors' reports for the Uranium Mill Tailings Remedial Action Project in Gunnison; data from the Environmental Protection Agency's monitoring project on air quality accessible through the Rocky Mountain Biological Laboratory (RMBL) in Gothic; RMBL can also provide access to data from acid precipitation studies conducted within the basin (p. 2-5); the recent Colorado Department of Health's water quality management planning documents; Gunnison County Interindustry Spending and Employment Attributed To Fishing At Blue Mesa Reservoir (1988) prepared by the Colorado Water Resources Research Institute; collections of county data published by Colorado State University; and reports on water and hydropower projects proposed for the basin.
2. The information given on wetlands and riparian areas should include reference to and be coordinated with any other identification and mapping projects undertaken by other agencies (pp. 2-16 - 2-17).
 - a. The condition and trend for riparian zones, soil erosion, and wildlife habitat should be given for each allotment in a manner similar to the information presented on range condition (Table B-5). Perhaps the data collection procedure in Ron Gregg's A Method For Analyzing Livestock Impacts On Stream And Riparian Habitats (undated, BLM, Montrose District) may be a starting point.
3. Because livestock grazing management is a major issue, the final EIS should update the general economic and social information on the agricultural sector presented in the Gunnison Basin Livestock Grazing Environmental Impact Statement - Draft (1980) prepared by the Montrose District.
4. The FEIS should include an assessment of progress, or regression, with respect to resource conditions and an analysis

4. Thank you for the comment and the additional sources of information. They may help in future analyses. BLM relies on estimates of recreation use based on daily observations over time that are specific to public lands rather than utilizing data that is often lumped with other agencies estimates of use.

The Surface Water Quality and Ground Water sections of the DRMP were prepared using current data. The BLM is aware that additional water quality data is available but unless the data supports a direct effect on resource values on public land or other land from a BLM action, it was not incorporated into the DRMP.

Most large-scale projects would be addressed in detail in site-specific analyses when proposed and prior to being constructed. Examples would be vegetative or land treatments, timber sales, and development of recreation areas.

The socio-economic data in Tables 2-1 through 2-4, and E-1 through E-5 in the DRMP has been updated and included in Appendix E of this document.

5. Coordination would continue with other agencies in the identification, inventory and mapping of wetlands and riparian areas. Also, please refer to the response to comment 1 of letter 9.
6. Recent detailed data on the condition and trend for riparian areas for each Allotment is lacking. However, monitoring data indicates that damage to riparian vegetation, soils and streambanks is widespread. This is addressed extensively in the DRMP, and also in the PRMP.

Data quantifying soil erosion rates or condition is not available for riparian zones nor for each Allotment. Soil erosion condition is summarized and shown in Chapter Two of the DRMP in Table 2-7.

We have included the soil and water resources and economic information in the DRMP and PRMP that we feel necessary in order to address and analyze the issues and make decisions.

7. BLM's best available information regarding resource conditions Planning-Area wide is contained in the paragraphs under each resource heading in Chapter Two, Affected Environment, of the DRMP, and in certain of the Appendixes. The assumptions and expectations given in earlier management plans, and other documents, were considered and referenced in the development of this RMP. Please refer to page 3-4 in the DRMP, under the heading titled "Existing Management Plans and Documents". In addition, the Management Situation Analysis (MSA), a document(s) prepared in advance of the DRMP, contains a great deal of information that was not shown, or was summarized in the various chapters of the DRMP and PRMP. The MSA is available for examination at BLM offices in Denver, Gunnison, and Montrose.
8. It may be that management of some other resources may have greater economic values than those directly obtained from livestock grazing on public lands (or other uses). However, BLM is mandated to manage for multiple resources. Economic values become only one factor in determining tradeoffs when it is determined that land use allocation is required. Cost benefit

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

of assumptions and expectations given in earlier management plans - particularly with respect to range condition, basal cover, erosion, and livestock and wildlife utilization, and DRV management.

7 a. Evaluation of past experience as to what was achieved, what was not, and why would assist the discussion of Alternative A which is the continuation and current rate of accomplishment of the earlier planning goals, programs, and projects (p. 3-1).

8 5. The RMP should present criteria for evaluating specific management actions during the planning period - particularly range improvement practices. Experience in Utah with the management of similar resources shows recreational values for hunting, camping, wildlife, and wildlands protection will equal or exceed values obtained from public resource land used for livestock (C. Arden Pope III and Fred J. Wagstaff (1987) An Economic Evaluation of the Oak Creek Range Management Area, GTR-INT 224, USDA - Forest Service, Intermountain Research Station, Ogden, Utah). This study provides a relevant demonstration of procedures useful when considering specific range projects for evaluating their cost effectiveness with respect to resource management goals and also market and non-market benefits.

9 6. Information given in the BLM's Gunnison Basin Livestock Grazing Environmental Impact Statement (1980) suggested changing economic conditions and the need for all concerned to begin looking for alternative income sources for ranching families (pp. 78 - 82 of this document). Discussion of implementation in the RMP needs to recognize the constraints of economic and social trends in the agricultural sector as well as expected budgetary constraints on the BLM's investment in range projects for livestock production (p. 3-3). A suggested starting point is with relevant papers and their references found in J. E. Mitchell, Ed., (1988) Impacts of the Conservation Reserve Program in the Great Plains: Symposium Proceedings - Denver, Colorado, September 16-18, 1987 GTR-RM 158, USDA-Forest Service, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado.

10 As shown in the RMP/EIS, new demands are appearing for the forage resource - including performance of hydrologic and soil stabilization functions. Their economic values appear to presently, or soon will, exceed in importance those economic values associated with livestock production. New and older resource demands are often combined or are complementary, sustainably by the resource base. The RMP should require documentation and allocation of all costs and benefits, by purpose and direct beneficiary.

11 7. There is brief mention of forest management in the discussion of the affected environment (pp. 2-30 - 2-31). However, the alternatives do not provide such, if any, consideration of this management activity, yet there is logging on BLM lands. The RMP should specifically provide for protection of the values associated with old-growth "unmanaged" timber stands.

12 a. Management for and subsidies to traditional commercial forestry in this part of the Rocky Mountains does not appear appropriate given rotation length, product yield, management costs, logging costs, and conflicts with other values associated with the timber resources - especially within this management area. However, in the RMP there may be an opportunity to deal with some local forest resource "problems" - specifically stagnant dog-hair stands - with new technologies for post and rail products, joist flanges, and poles. The flexibility available to the BLM in its timber resources management should be directed toward maximizing the amount of value added locally through the utilization of this forest resource. Examples are local production and consumption of joists made from small stem flanges and plywood webs and by encouraging local fabrication of furniture with pole frames for the local second home and resort condominium market. A general reference for this is W. C. Scheidt, Comp. (1988) Proceedings - Future Forests of the Mountain West: A Stand Culture Symposium, 1986, September 29 - October 3, GTR-INT 243, USDA - Forest Service, Intermountain Research Station, Ogden Utah. There are more recent publications on specific aspects of this concept.

SPECIFIC COMMENTS:

14 1. The base used for maps in the RMP/EIS should show boundaries and identifying numbers for grazing allotments and wildlife management areas. This would help in using tables such as Appendix 8-5.

2. To facilitate coordination with local governmental planning and public safety efforts, the locations of identified hazards such as open mine shafts should be mapped and this information distributed (p. 3-22).

3. To facilitate coordination with local governmental planning efforts, the intended or possible uses of lands identified for potential disposal should be presented (pp. 3-20 and 3-21).

15 4. In discussion of impacts on social and economic conditions (Chapter 4), the alternatives should specifically provide for keeping local governmental entities and other interested parties apprised of proposals for large scale resource projects. Specific projects can not easily be anticipated in the resource planning process and they do have very significant implications. Sharing information among all interested parties at the earliest possible time helps everyone to respond to any challenges presented. For example, the RMP could provide for hosting a monthly or quarterly "roundtable" for information sharing.

16 5. There appears to be an error in the amount given for Total Retail Sales of Gunnison County in 1980 (p. 2-3, Figure 2-2).

analyses would be prepared and considered at the time specific projects or developments are being planned, where appropriate.

9. Thank you for the references. Among the assumptions used in the preparation of the RMP, there are three that warrant mentioning in the response to this comment: 1) all of the alternatives would be fully executed within the 10-12 year life of the plan, 2) a 15 percent increase in funding would be required to implement Alternatives B, C, D, or E, and the PRMP, and 3) public lands would continue to contribute significantly to the livestock industry in the Gunnison Basin. The BLM continues to feel that these assumptions are appropriate in the development of the land use plan. Cost benefit analyses would be prepared and considered at the time specific projects or developments are being planned, where appropriate.

10. Please refer to the response to comment 8 of this letter.

11. The management of forest resources, and constraints to protect other values, are discussed in each alternative in the DRMP, and the PRMP. The BLM recognizes the importance of the management of old growth timber. Old growth timber management would receive due consideration if it becomes a component of future timber sales. When an old growth timber management policy is adopted, it would become effective immediately, and if necessary, the RMP would be amended to reflect this policy, or old growth considerations.

12 and 13. Thank you for your ideas on the utilization of forest products. At this time, there is no known local demand for fabricated joists, flanges of half-round stems, or flakeboard webs from stagnant, dog-hair stands. Such stands usually occur in lodgepole pine, which actually comprises a very small amount of the forest in the Gunnison Resource Area. If the demand does occur, BLM would, within the allowable cut, consider making these wood products available.

14. The level of planning underway in the RMP process is not grazing Allotment-specific, although many actions discussed in the DRMP and PRMP would potentially affect a variety of resources in some grazing Allotments. Thus, grazing Allotment boundaries are not shown on the base map for Alternatives B, C, D, and E in the DRMP, nor are they shown on the base map for the PRMP. In addition, adding grazing Allotment boundaries and their numbers would potentially create a crowded map. Colorado Division of Wildlife (CDOW) management areas are shown on the base maps in the DRMP and PRMP, but were not labeled.

15. The State of Colorado, Mined Land Reclamation Division, through the Colorado Inactive Mine Reclamation Program maintains an inventory of inactive mine workings which might be considered hazardous. This inventory includes both public and private lands. The BLM cooperates with the State Agency by providing any relevant information on hazardous sites occurring on BLM-managed land. The BLM does not dictate nor prescribe future uses of lands that are identified for disposal, except that existing legal, or authorized uses by the United States or others, for instance easements for access, are in certain instances valid rights that are transferred with title or patents. Local zoning authorities, where applicable, prescribe allowable uses that occur on privately owned lands. The BLM would continue to brief local governments on issues and projects occurring on public land.

16 and 17. The amount given for Total Retail Sales of Gunnison County in 1980 in Table 2-2 in the DRMP is in error. Please refer to Appendix E in the PRMP for the corrected Table 2-2. The BLM realizes that constant dollars could be used to compare the retail sales figures, but in our judgement the actual amounts were adequate.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

17 Interpretation of these retail sales figures should also include consideration for effects of inflation by providing a comparison amount in constant dollars.

6. For all alternatives, the control of erosion and sedimentation is needed for reduction of non-point source water pollution. The RMP should require and explain strict application of best management practices (pp. 3-102 - 3-103 for Alternative E).

18 A starting point in the RMP should be expression of general guidelines for logging, road building, grazing, and burning activities. An example are those guidelines advocated almost forty years ago which include moderate grazing to maintain a 4 inch stubble height (E. B. Dunford and Sidney Weitzman (1955) Managing Forests To Control Soil Erosion In The Yearbook of Agriculture for 1955 - WATER, pp. 235 - 242, U.S.D.A., Superintendent of Documents, Washington, D. C.)

Sites at lower elevations appear to have less basal plant cover for erosion control and soils more prone to erosion (p. 2-9 - 2-11). Most of the resource area is in the moderate-high and above erosion potential classes with sediment yields higher in lower elevations (p. 2-13). Emphasis in the RMP should be on prevention of any further degradation of the resource base by uses of all kinds and at all times - particularly transportation (p. 2-39).

7. Under the preferred Alternative E, improvement is expected in the quantity and quality of livestock forage (p. 4-66). Given past experience and current resource conditions (Table B-5), how this will be achieved while maintaining current forage allocation levels (p. 3-105) should be more fully explained and justified.

Alternative E provides for grazing at a "moderate level, or 40-60% of current year's growth" and maintaining only in areas with a riparian resource emphasis the 2.5 inch and sometimes 4 inch minimum stubble height (pp. 3-105, 4-62, and 4-66). A comparison of data from the 1980 grazing EIS with data presented in this RMP/EIS shows there has not been such general improvement in resource conditions and suggests little reason for expecting significant improvement in the future with the expressed criteria. To maintain and then restore the condition of the forage resource base in the Summit Resource Area over the long term, appears to require such moderate forage utilization by both livestock and wildlife than proposed in Alternative E.

19 Almost forty years ago such criteria for utilization as given in Alternative E would be considered inadequate for maintenance of the resource base of forage and soils. At that time it was stated that moderate grazing of an area should leave approximately 4 inches of stubble and leaving 2 inches or less constitutes a "heavily grazed" situation resulting in important soil losses (E. B. Dunford and Sidney Weitzman (1955) Managing Forests To Control Soil Erosion In The Yearbook of Agriculture for 1955 - WATER, pp. 235 - 242, U.S.D.A., Superintendent of Documents, Washington, D. C.). Also at that time others stated, "The amount of vegetation on the ground throughout the grazing season has a major influence on how much of the water is put to

19 productive use, how much evaporates, and how much escapes through runoff. ... Many years of practical experience by ranchers indicate that "take-half-and-leave-half" is a good rule of thumb to follow on most ranges. Under some conditions, however, even that use is not light enough." (F. B. Renner and L. D. Love (1955) Management of Water on Western Rangelands in The Yearbook of Agriculture for 1955 - WATER, pp. 415 - 423, U.S. Department of Agriculture, Superintendent of Documents, Washington, D. C.). These authors cite studies in Colorado commencing in the 1930's and argue that soils on deteriorated ranges dry out more quickly, have less water absorption, and experience more erosion.

20 B. The emphasis upon protection and improvement of riparian zone conditions is a particularly significant feature of the RMP. It should be strengthened by:

a. Incorporating the specific and more extensive emphasis given to riparian values and resources by unit identification in Alternative D into the preferred Alternative E.

b. Specifically providing in Alternative E (p. 3-103) for allocation of increased vegetation and forage within riparian areas primarily to the protection and management of watershed resources - for reduction of soil erosion, for bank stabilization, and for sediment transport control as indicated for Alternative B (pp. 3-18 - 3-19).

21 c. The pursuit of water rights adjudicated for instream flows and range water sources should be commended and emphasized in Alternative E (pp. 2-11 and 3-102).

22 9. The RMP generally and the alternatives specifically need to address more thoroughly the issues of enforcement and monitoring (for example p. 3-109). Greater emphasis on both is essential for accomplishing the expressed planning objectives. Criteria for determination of need for patrols and enforcement should be given.

10. Recreation management requires greater emphasis on resource base protection. Recreational usage has reached the point of causing resource damage in many locations. An example is non-point source pollution resulting from vehicle traffic, on and off roads, especially during wet conditions.

a. Road closures are needed when vehicle use will create excessive damage to the road surfaces and exacerbate erosion (p. 2-39).

23 b. If roads are to be open and used under adverse conditions, specifically during the hunting seasons, provisions should be included in the RMP for immediate corrective maintenance so as to prevent excessive erosion during the subsequent spring runoff.

c. ORV activity requires greater management emphasis to protect the resource base (p. 2-31). With the estimated supply of ORV opportunity being high and the demand being low to moderate (p. 2-34), the preferred Alternative E should include specific limitations on ORV's such as seasonal road and area

18. The DRMP, in the STANDARD MANAGEMENT sections titled "Soils and Water Resources", for the various alternatives, includes the provision that "Best Management Practices" (BMPs) would be employed to protect soil and water resources. The BMPs needed to achieve this goal vary by management action. Therefore, specific BMPs would be discussed and determined in site-specific resource activity plans, which is a subsequent step in BLM's planning process.

19. Current forage allocations would be maintained in the Preferred Alternative (E) of the DRMP, subject to needed adjustments and conditions specified in various Management Units in the Planning Area. Minimum stubble heights have not been required in the past in the Planning Area, and this measure of use, along with percent of use, would provide better indicators of forage utilization. These indicators would be used in determining when to move livestock to other areas, thereby assuring that minimum forage would remain for maintaining and improving soil, water, vegetation, and other resources on riparian areas and uplands.

20. Thank you for your suggestions. In the judgement of BLM, the Management Unit identification and the prescriptions for units E-14 and E-15 would provide the degree of management, enhancement, and protection necessary for values in these riparian areas. Additional conditions could be required as plans are developed for surface-disturbing proposals. Comment 1 of letter 24 deals with a similar concern.

21. Thank you for the comment.

22. The BLM would continue patrols and monitoring of activities on public lands by resource specialists as well as law enforcement personnel. Monitoring and observations by resource specialists is done while travelling to and from the field and while in the field, and patrols by law enforcement personnel are continual. Additional monitoring and patrol capabilities would be dependent on budgets.

23. This paragraph addresses the numbered items 10 a), b), and c). Language has been included in the Recreation Management section of Standard Management in the description of the PRMP to clarify BLM's road closure policies. Some roads would continue to be kept closed in the spring or other seasons until resource damage would likely not occur. Emergency road closures would occur if unacceptable resource damage occurs. While this system is generally effective it cannot always deal immediately with localized problems caused by unusual weather or other unforeseen factors. The BLM would continue to recognize and respond to the need for seasonal closures by installing gates at key access points in problem areas.

The existing wide diversity of trail users and equipment, i.e. hikers, horses, mountain bikes, all-terrain vehicles (ATVs), motorcycles, 4-wheel drives, and the somewhat limited transportation network necessitate the management of most of the areas for multiple recreation groups.

24. Specific mineral disposal actions would be processed on a case-by-case basis whenever there is an application for disposal. Necessary mining environmental documents would be completed at that time. The RMP identifies those areas where, because of other resource values, disposal would not be permitted.

25. All Wilderness Study Areas (WSAs), including those adjacent to USFS managed lands, would be managed to protect their wilderness values until congress acts upon their designation. Page 1-5 in the DRMP explains the Wilderness Study Process and its relationship to the RMP/EIS.

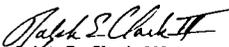
APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

- 23 closures to protect the resource base as well as wildlife (p. 2-33).
- 23 d. The RMP should provide for working toward modal separation between motorized and non-motorized transportation. Both forms of transport should be restricted to appropriately designed and well maintained routes.
- 24 11. Discussion of disposal of saleable mineral resources should include the location and reclamation requirements of sites proposed for cover and riprap needed in the Gunnison uranium mill tailings remedial action project (p. 2-9).
- 24 12. Additional explanation is needed on the management of wilderness resources and study areas (pp. 2-35 - 2-36). Will existing wilderness resource values remain protected on the BLM wilderness study areas, particularly those adjacent to Forest Service study areas, until there is a wilderness designation decision by Congress? It would appear that this should be done, despite the Forest Service's recommendations for its study areas.
- 25 13. As distinguished from other resources being managed, the wilderness resource should be managed specifically for resource value protection. It should not be evaluated in terms of a recreational demand (p. 2-37). The RMP should specifically provide emphasis upon recreational use control for the protection of wilderness resource values.
- 26 14. Recreational use generally is expected to increase (pp. 2-31 and 4-9 - 4-10), perhaps more than any other type of use within the resource area. Like any other resource use, recreational use requires control. The RMP in Alternative E should emphasize much stricter control of recreation activity to achieve restoration, not just maintenance, of declining resource conditions - particularly in riparian areas, for improvement of habitat and range condition, and for coping with soil loss.
- 27 a. With the expected increase in recreational activity and the importance of it to the local community economies, the RMP/EIS should demonstrate how proposed recreational facilities and projects can enhance local economic activity. There should be an analysis of economic impacts for proposed recreational actions - particularly with respect to visitor expenditures. A useful starting point is with Richard G. Walsh (1984) Recreation Economic Decisions: Comparing Benefits and Costs, Venture Publishing, Inc., State College, Pennsylvania and H. Ken Cordell and others (1990) An Analysis of Outdoor Recreation and Wilderness Situation in the United States: 1989 - 2040: A Technical Document Supporting the 1989 USDA Forest Service RPA Assessment, GTR-RM 189, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado.
- 28 b. The RMP should provide for analysis and consideration of net value added with the resource area when examining recreational resource management options.
15. The designation of Special Recreation Management Areas, Areas of Critical Environmental Concern, Extensive Recreation

26. The protection and enhancement of recreational values and opportunities is emphasized in the DRMP Preferred Alternative and the PRMP. Given our multiple use management mandate, BLM feels that the PRMP provides for balanced uses with emphasis given to providing recreational opportunities.
27. Again, thank you for the references. Page 4-55 of the DRMP indicates that a 40% increase in primarily dispersed recreation activity would have a medium to high positive impact to income and employment, especially for those businesses providing tourist and recreation sales and services. Additional detail is not available at this time, nor is it needed to make decisions in this plan.
28. Please refer to the response to comment 8 of this letter.
29. The BLM agrees the Lake Fork of The Gunnison River is an important resource with many values that deserve protection and management. The BLM feels that existing withdrawals, existing designations, and proposed management prescriptions are adequate to protect the values of the river corridor. The entire length of the Lake Fork of The Gunnison River is contained within the Alpine Triangle SRMA, and would continue to be managed according to activity plans for the SRMA, and other regulations and policies.
30. See the response to comment 2 of letter 8.

- Management Areas, and similar forms of recognition provides a needed sense of focused emphasis to the resource management of specific places. Such recognition helps to provide direction for multi-disciplinary management teams and to capture the interest and involvement of those outside the BLM. Both are needed for coping with the challenges presented by resource management within these places.
- 29 a. Alternative E should give special recognition to providing some form of area designation to the river corridor of the Lake Fork. This corridor should be managed as a single unit, from the headwaters to Blue Mesa Reservoir, with a specific emphasis given to protecting those values making it worthy of consideration for Wild and Scenic River designation. This unique combination of values is a major asset to the Lake Fork Valley community's future.
- 30 b. The East Gunnison ACEC designation is needed in the RMP to focus management upon restoration of a degraded resource base within this well defined geographic area. The combination of resource management challenges presented within this area suggest proposing it as one of a series of national experimental and research sites for the BLM. The area also offers a demonstration opportunity for cooperative resource management among a diversity of interests, public and private.

Respectfully:


Ray E. Clark III

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Mountain Prairie Region

MAILING ADDRESS
Post Office Box 2840
Denver, Colorado 80222

STREET LOCATION
235 Evans Road
Lafayette, Colorado 80225



Responses to letter 36

1. See the corresponding responses to the 10 comments in letter 9. These are nearly identical letters from the same agency.

FWE
MAIL STOP 60120

MAY 31 1991

36

Memorandum

To: Resource Management Plan Team Leader, Bureau of Land Management, Montrose, Colorado

From: Assistant Regional Director, Fish and Wildlife Enhancement, Denver, Colorado

Subject: Draft Environmental Impact Statement and Resource Management Plan for the Gunnison Resource Area

We have completed our review of the Draft Environmental Impact Statement (Statement) and Resource Management Plan (Plan) for the Gunnison Resource Area (Area). We have given most of our attention to threatened and endangered species and wetland issues that are disclosed for Alternative E, the preferred alternative.

GENERAL COMMENTS

The preferred alternative recognizes the importance of continuing to consult with the Fish and Wildlife Service (Service) for those activities that may impact federally listed threatened or endangered species. This alternative also proposes to designate specific areas within the Area for the protection of the skiff milkvetch (*Astragalus microcymbus*), a Federal candidate species, and the uncommon fritillary butterfly (*Boloria acrochroa*), a federally proposed species. The draft Statement also acknowledges the previous coordination that has occurred between our agencies. However, we believe the Statement could be improved by giving more attention to the following issues: (1) Wetlands; (2) water depletion from the Upper Colorado River Basin; (3) the boreal western toad (*Bufo boreas boreas*), a Federal candidate species; (4) prairie dog distribution and abundance; and (5) black-footed ferrets (*Mustela nigripes*).

Wetlands are a unique vegetative community that can provide habitat for many species of wildlife. In recent years, many Federal Agencies have dedicated a significant amount of effort to inventory wetlands and to better define their value. The Statement has no discussion of the wetland types or values that may occur in the Area. Based on our limited knowledge of the Area, we believe wetlands probably exist. We believe the Bureau of Land Management (Bureau) should, therefore, give consideration to qualify and quantify the various types of wetlands that may exist in the Area.

1

36²

The Statement recognizes that water resources within the Area may be utilized for transbasin diversions to the East Slope (page 2-14). We believe any depletion of water from the Upper Colorado River Basin is an impact to the federally listed fish species occurring in the basin, and therefore would trigger a "may affect" finding under the Endangered Species Act (Act). Consequently, we believe Chapter 4 (Environmental Consequences) should determine whether water depletion will occur with any of the alternatives and disclose the quantity of depletion (in acre-feet) occurring with each alternative.

2

The boreal western toad is a Category 2 candidate species. This toad inhabits marshes and wet meadows and similar habitats generally between 8,500 and 11,000 feet. There are historical records of this toad from southern Hinsdale and northern Gunnison Counties. Due to the recognized declining status of this toad and its historical occurrence within the Area, we believe it should be included in Table 2-12 (page 2-19). There also should be some consideration to determine the toad's current status on the Area.

3

Recently, the Service received an inquiry from Dr. James Fitzgerald of the University of Northern Colorado regarding the status of the Gunnison subspecies of the Gunnison prairie dog (*Cynomys gunnisoni gunnisoni*) throughout its historical range (this is the subspecies that occurs in the Area). He presents evidence suggesting a significant decline in the abundance and distribution of this animal. Due to this inquiry, the value of prairie dogs to many other species and the potential implications to ferret recovery, we believe it is appropriate for the Statement to address prairie dog abundance and distribution in the Area.

4

We find no significant attention to the black-footed ferret in the Statement. Although we know of no historical records of black-footed ferrets from the Area, it is generally believed they overlapped the range of all prairie dog species in Colorado. For the past 3 years, a multiagency working group has been cooperating on a statewide effort to inventory prairie dog distribution. The purpose of this inventory is to attempt to resolve prairie dog management issues and identify candidate black-footed ferret reintroduction sites. Your State office and the White River and Little Snake Resource Areas have been involved with this activity for several years. Due to these ongoing recovery efforts and the presence of prairie dogs in the Area, we believe the Statement should dedicate more attention to the black-footed ferret. Although page 3-103 makes a generic statement regarding the reintroduction of threatened and endangered species, we ask the Bureau to determine whether this is adequate to obviate the requirement of an amendment to the Plan should a candidate reintroduction site for black-footed ferrets be identified.

5

SPECIFIC COMMENTS

Page S-1, Table S-1: If water depletion will occur due to any of the anticipated activities authorized by the Plan, compare these depletions for each of the alternatives. Also, include a comparison for the wetlands associated with each alternative.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

36 3

Page 2-14, Vegetation: There should be a discussion of wetlands. We believe it also would be appropriate to categorize the wetland according to Cowardin, et al. (1979).

6 Page 2-18, Special status plant and animal species and habitat: The Endangered Species Act (Act) provides full protection to only federally listed species. Delete the reference to "sensitive species."

Page 2-18, Animals: Add the boreal western toad to the text and include it in Table 2-12.

7 Page 2-19, Invertebrates: The Uncompahgre fritillary butterfly was proposed for listing as an endangered species on October 15, 1990. This new designation should be recognized, and the species should be added to Table 2-12. The animal now receives protection under the Act.

8 Page 2-20, Table 2-13: Astragalus anisus, the Gunnison milkvetch, occurs on Bureau land in the Parlin area and undoubtedly on similar habitat elsewhere in the Gunnison Valley. There is recent data on this species. John Anderson, our staff botanist, observed it there in 1989 and 1990. Dr. Barry Johnston, Gunnison National Forest, has a list of older collections. There is no current data to indicate whether this species is common or rare. However, it is still a Gunnison Basin endemic and thus a localized species.

Page 4-56, Impacts on soils and water resources: This section should conclude whether any water depletion will occur with the preferred alternative, as suggested on page 2-14, Transbasin diversion.

9 Page 4-59, Impacts on special status plant and animal species and habitat: It may be appropriate to restate the requirement for formal Section 7 consultation for any activity causing impact to federally listed species. This also could relate to the land disposals referenced in the document.

Appendix A, Table A-4: We believe spatial and temporal buffers can be effective in reducing potential impacts. We again emphasize that any required consultation under the Act may recommend buffer zones that are different than those provided in this table.

Page 6-1, Threatened, endangered, and sensitive species: It is obvious that specific situations may require measures to avoid or offset potential impacts that are not shown here.

10 Page J-1: Most of this page recites text from the Federal Register that lists those species considered Federal candidates. This list is published by the Service biannually. We believe some of the text you reference is outdated; for

36 4

10 example, the second sentence of the second paragraph ("Also . . . extinct"). We believe you should reference the January 6, 1989, Federal Register for correct terminology and interpretation. You may want to wait for the newly revised list, which should be published soon.

Appendix K: Again, we wish to emphasize that any required Section 7 consultation may recommend stipulations not identified in other documents.


ROBERT D. JACOBSEN

cc: Colorado Division of Wildlife,
Montrose CO

Fish and Wildlife Enhancement,
Golden CO, Grand Junction CO,
Salt Lake City UT

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

3333 S. North-South Blvd., #1008
 Lakewood, CO 80227

June 3, 1991

37

Responses to letter 37

1 through 4. Please see the responses to comments 1 and 2 of letter 8, and 1 and 2 of letter 12, respectively.

Dear Mr. Bottomly:

I am writing in regards to the draft Resource Management Plan and Environmental Impact Statement for the Gunnison Resource Area in Hinsdale, Gunnison, Saguache, Montrose, and Ouray Counties. I have several points of contention as I feel that the draft plan does not do enough to protect the area's high scenic and ecological values, nor does it provide additional recreational trails to meet the continually increasing demand in the area.

1 I strongly support designation of the Lake Fork of the Gunnison as a Wild and Scenic river. This river, which flows through the heart of the Alpine Triangle Special Recreation Management Area has many outstanding visual, geologic, and recreational values that need to be preserved and enhanced for future generations to enjoy.

The headwaters of the Lake Fork downstream to Lake San Cristobal offer some of the most outstanding scenery found on BLM lands nationwide. The river corridor includes excellent geological characteristics, most notably the Slungulion Slide National Landmark. The downstream end of the Lake Fork below Red Bridge Campground is a popular rafting and fishing stretch and contains the beginnings of the Black Canyon of the Gunnison.

All of the Lake Fork, from its origin at Sloan Lake in the Handies Peak proposed wilderness to Blue Mesa Reservoir, deserves Wild and Scenic Protection.

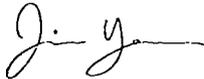
2 The BLM has recommended only portions of the highly scenic Alpine Triangle for ACEC (Areas of Critical Environmental Concern) designation. While Wild and Scenic designation of the Lake Fork will protect the lands adjacent to the river, ACEC designation for the entire Triangle is necessary to protect those lands outside the river corridor.

This area is the most popular and heavily visited area the BLM manages in Colorado, and is among the most scenic areas in the nation. Specific values that need protection are: three 14,000 ft. peaks (Handies, Sun-chine, and Redcloud), habitat for the rare Uncompahgre Fritillary butterfly, numerous historical structures, and bighorn sheep habitat.

3 The BLM should construct more single track trails outside of proposed wilderness areas to accommodate increased hiking and mountain bicycling demands in the area. Motorcycles and jeeps should be restricted to existing trails at all times.

4 Much of the rangeland in the Gunnison Resource Area is in fair or poor condition because of inappropriate grazing and over-grazing in the past. The BLM must institute grazing management practices that protect and improve riparian habitat, control sediment loss, and restore the rangeland to good condition.

Sincerely,
 Jim Yonan



Ochs Bros.
 Box 1234
 Gunnison, CO 81230
 May 31, 1991

38

Responses to letter 38 (items mentioned in many of the comments in this letter refer to unnumbered paragraphs in Table S-1 of the Summary, Chapter One, in the DRMP)

1. Item two referenced in the comment deals with the management objective of improving watershed conditions by increasing plant basal cover. Item four prescribes that specific mitigating measures must be incorporated into all surface disturbing activities.

2. A soils project is any number of man-made devices that would be constructed to prevent surface soil erosion. The simplest of these would be small projects such as water bars to prevent gullies and erosion in roads or trails. Check-dams are another type.

Many of the areas identified as "crucial big game winter range" were initially identified and mapped in the mid-70s. Ranges are consistently updated as new information is collected.

Please refer to pages 2-23 through 2-26 of the DRMP for details on the big game winter ranges and associated use.

3. The objectives proposed in the DRMP for riparian zones require that roads be improved and future construction be controlled. Costs to achieve these objectives would be variable, and would be funded from watershed and road maintenance budgets for the Resource Area. Please see Riparian Zones, page 3-103 in the DRMP for more information.

4. A negative impact to riparian areas generally occurs if an action reduces the quantity or quality of the riparian vegetation, causes surface (soil) disturbance, or affects the surrounding upland in a way that the riparian area receives damage from increased stream flow or sedimentation.

Bill Bottomly, RMP Team Leader
 Bureau of Land Management
 2505 South Townsend Avenue
 Montrose, CO 81401

Re: Draft Gunnison Resource Management Plan/
 Environmental Impact Statement (RMP/EIS)

Dear Sir:

Enclosed are my comments on the above referenced document:

1 (2) Page S-3 - Soil And Water Resources, Under Alternative E. What is the difference between the second and fourth items of management? If these items are to be as broad and undefined in scope as they are, item two under Alternative A seems to presently cover the matter.

2 (2) Page S-4 - Soil And Water Resources, Under Alternative E. Item 3 permits soils and watershed projects (what is a soils project?), if compatible with crucial big game winter range management. When did this area receive official designation as a crucial big game winter range management area? How many winter AUM's of big game use have been officially allocated to it? What is the historic specific big game winter use in the area? The same comments apply to item 4.

3 (3) Page S-5 - Riparian Zones, Under Alternative E. What are the special road construction objectives, how will they affect present use, when were they adopted, what will they cost, where will the money come from to pay for them and when will it be available? Same comments apply to existing water sources and roads in riparian areas. What is the meaning of, and how do you define, "...if riparian zones are being negatively impacted?" Does any present use at all constitute negative impact? When was 56 miles of riparian zones in units E-11 and E-14 designated as critical sage grouse habitat? What is the historical sage grouse use, including season of use and populations throughout these 56 miles. Is this management to take precedence over other historical uses? Will it impede big game and livestock grazing? The same questions are asked about the 99 miles of riparian zones mentioned in this section. Will this practice impede or reduce livestock grazing. Is it truly consistent under Alternative E of the Resource/Resource Use section? No where in this Riparian Section does this

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Bill Bottomly
Page 2 - 5/31/91

33

6 | Alternative E provide for livestock grazing, which it appears by these management goals to be totally subjugated to big game and sage grouse use.

7 | (4) Page S-6 - Riparian Zones, Under Alternative E. What is the meaning of "Compatible" riparian improvement projects permitted along 58 miles...etc.?" Who will define "Compatible"? Does permitted mean "allowed" or is the intent to encourage and build? What is the historical fish population and use in unit E-15. Is this improvement project permitting to take precedence over all other uses of the area and perhaps eliminate some other uses?

Most of the management practices listed on the summary for Riparian Zones under Alternative E are vague and the implication of their adoption are unclear. Alternative A is more clear with an understandable historical background. It can provide the same results under its broad mandate and it should be the adopted alternative because current management practices acknowledge the importance of riparian areas and are working to preserve and improve these areas.

8 | (5) Page S-6 - Special Status Plant and Animal Species, Under Alternative E. Item 3, could conceivably be used to prevent mining, mineral leasing, etc., from vast areas of the public land. Under Item 4, when did skip milkvetch become a critical plant? When did the Uncompagre fritillary butterfly populations become critical. What is their "habitat". Why is not this butterfly and its habitat not included under Wildlife Habitat Management on the next page? Will these butterfly and milkvetch areas be closed to other uses? What other uses compete with them? With all of these questions and the possible problems that they reveal, Alternative A seems to be the best management alternative for this section.

9 | (6) Page S-8 - Wildlife Habitat Management. Under Alternative E, the first management practice would be to revise BA RMP and implement with BLM's Fish and Wildlife Plan For Colorado - Program For The Decade. What does this do with respect to other uses on the BLM lands? Why maintain wildlife forage allocations, including big game, at current levels when big game numbers in Colorado are far and away the highest in recorded history, have far outstripped the productive winter range capacity, and according to DOW local managers need to be reduced in numbers since a colder, harder, and snowier winter with an early onset would result in one of the greatest die-offs ever seen in the area and evoke a public outcry of unprecedented proportions which would result in severe and warranted criticism against all agencies and personnel in any way responsible for the catastrophe.

5. These areas were identified as "critical sage grouse areas" in a 1987 technical report by Jerry Hupp, a noted sage grouse expert. Research published in 1968 (Savage) and 1971 (Oakleaf), and documented in a Master's Thesis in 1986 (Evans), found that meadow habitat is critical for sage grouse broods, and for non-breeding adults. This is reflected on page 2-26 of the DRMP and related prescriptions for Management Units E-11 and E-14 in the Preferred Alternative.

Please refer to Page 4-67 in the DRMP, for a description of the estimated effects of the referenced recommendations on livestock grazing management.

6. Livestock grazing would continue to be authorized for most riparian areas. However, grazing would occur in such a manner as to protect riparian conditions, and to permit conditions in riparian areas to improve. Please refer to Livestock Grazing Management and Riparian Zone Management in the STANDARD MANAGEMENT section of Chapter Four in the PRMP for Planning Area-wide management direction for these uses and resources. Please also refer to the Table 1-1 in Chapter One, PRMP, for a summary comparison of management of all resources and uses in the DRMP and PRMP.

7. Compatible riparian improvement projects are those projects that (1), have no negative impact on riparian areas, (2), those whose limited impact on riparian areas is offset (mitigated) by improvement/enhancement in other areas, or (3), those projects that improve the riparian values or functions.

Upon consultation with BLM resource specialists and others, the Area Manager will determine if a project is needed and whether it will be implemented.

Livestock grazing would continue to be authorized and allowed in these areas in such a manner that will protect fishery resources, and permit these resources to improve. Please refer to the description and management in unit 15 of the PRMP for details on these riparian areas important to fishery management.

However, for a more complete and detailed comparison of livestock grazing management and riparian zone management in Alternatives E (Preferred Alternative) and A (Continuation of Current Management), please see pages 3-103 and 3-105, and pages 3-7, 3-8, and 3-9 in the DRMP. The table S-1 in the DRMP, Summary, only summarizes the information on the noted pages, and is included as a convenience and quick reference.

8. Restrictions placed on other resources to manage the relatively small acreage of known habitat or populations of special status plant and animal species would not result in significant impacts. Please refer to Page 4-55, Chapter Four, in the DRMP, or Page 5-1, Chapter Five, in the PRMP, for impacts to other resources from actions related to Special Status Plant and Animal Species and Habitat management.

9. The Skiff Milkvetch, a rare species of plant, was listed as a Category II species in the December, 1981 Federal Register, by the USF&WS. The Uncompagre fritillary butterfly was listed by the USF&WS as an endangered species on June 24, 1991.

Habitat characteristics for the milkvetch consist of open, juniper-sagebrush communities on steep slopes with thin, rocky, clayey soils. Preferred exposure is from southeast to southwest and in some cases, northwest. Elevation ranges from 7,600 to 8,100 feet. Habitat for the butterfly is found above 13,000 feet on northeast facing slopes. Snow willow (*Salix nivalis*) is the preferred larval food plant for the species, and a wide variety of common arctic - alpine plants are used as adult nectar sources.

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12 | It makes little sense to allocate all future forage first for watershed needs when excess growth over that required for reasonable plant health constitutes a fire menace with most serious ramifications for watershed protection by denuded watersheds resulting in unusual erosion and silting problems. Why allocate additional forage for a wildlife population which will certainly be reduced from present levels? There is more than enough forage for summer grazing, and leaving forage for winter big game use makes little sense when it will be covered by deep, crusted snow and the animals have become accustomed to supplemental feeding by the DOW or eating from private lands and private haystacks as they have habitually done the past few normal winters in the area. It seems far more reasonable to divide increases/decreases in forage between big game and livestock as is the present practice.

13 | Have raptor nest sites, crucial big game winter ranges, elk calving areas, sage grouse leks and sage brush habitat been properly defined and identified? If so, by whom. It is not a clear process and historical use must be properly recognized. It is not inconceivable that the entire BLM administered lands area could be so designated to the practical exclusion of all other uses.

14 | What is meant by "temporary long-range herd goal reductions in certain GNUs...?" Are you speaking of big game, sage grouse or livestock? Have the economics of such reductions been considered, presented and explained to individuals impacted economically and to the community-at-large by such Management Practices? The last EIS in the Gunnison Basin made allocations for big game use based on much smaller numbers than 9,000 elk and 16,000 deer. When was it discarded to allow the adoption of these goals which are clearly unsustainable thru the winter, now and in the future. Treatments on uplands and riparian areas to help the DOW achieve these goals in for the most part empty rhetoric. Big game use in a specific area is not readily controllable because these are wild animals and they go and hang out where they wish. To disturb them during critical times to preserve the habitat is not viable, doing possible harm to the animals. In light of this fact, can it be reasonable to assume that heavy used areas (including riparian areas) will not be damaged? This is inconsistent with the objectives on Page S-3 - Soil And Water Resources - Under Alternative E, "Measures for erosion reduction and increasing plant basal cover incorporated into vegetation treatments on soils with moderate to severe erosion potential." Big game can't know the difference, or care.

15 | (7) Page S-8 - Wildlife Habitat Management, Under Alternative E, how will the BLM in Gnu 64 South and East of Cimarron implement Percent reductions in elk and deer numbers when the BLM has no

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- 16 ³⁸ Practicable power to do so? Only the GOW can do that, and BLM can only recommend and issue hollow threats about the numbers. Recent past history shows no such permanent reductions occurring any place in the area.
- 17 Items 1 under this alternative relates to improving the habitat for use by wintering elk, deer and bighorn sheep. Is this caused by the acquisition of the Harris/Elze ranch on Beaver Creek for use by the DOW? At time of government acquisition of this ranch, livestock operators were promised that this acquisition would not impact their operations or reduce the livestock AUMs allocated to grazing permits in the area. This Item 2 certainly sets out the potential for reduction of livestock use (and removal from some areas) by seeking improvement solely for big game use and permitting only land uses that do not remove or damage elk and deer crucial winter range, which terminology is subject to wide interpretation and not based on historical use pre-dating government acquisition of the Harris/Elze Beaver Creek Ranch.
- 18 Item 4 under this alternative relates to a site specific activity plan (HMP) would be developed for 76,192 acres of crucial elk and deer range in Unit B-12. What is "site specific activity plan?" Does this connote that all other competitive uses will be eliminated? If so, it seems to improperly remove the multiple use concept from a very large parcel of land. It sets out that compatible wildlife treatments and management actions are permitted, but makes no mention of allowing other treatments or management actions.
- 19 Item 5 sets our improvement "to support 500 pronghorn habitat, 500 bighorn sheep, to harvest 1000 sage grouse annually...." This has an obvious misprint in it and is unclear as to what is intended. Certainly the BLM has no reasonable control over the number of sage grouse to be harvested. This entire item seems simplistic. Each place throughout this document where treatments or improvements are mentioned, it makes no reference to the source of funds or the magnitude of the expenditure envisioned. Over the past 20 years woefully small amounts of funding have been available, and the likelihood of significant increase is remote, given the fiscal condition of the federal government.
- 20 (7) Page 5-9 - Wildlife Habitat Management (continued). In item 1 under Alternative E what treatments are envisioned to increase forb and shrub species throughout the entire area if it is all eventually considered crucial winter range? If these species need increasing, what effect has the present high numbers of big game animals had upon them? Will they be increased at the sake of all other uses? What is meant by, "an activity plans are implemented?"

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- 21 ³⁸ The 7,122 acres in item 2 under this alternative, to be managed to minimize disturbance to bighorn sheep and potential lambing areas - What is a "potential lambing area?" Will all other multiple uses be sacrificed year long for this objective? What are the bighorn sheep populations in this area? What is their historical pattern of use of this area.
- 22 Managing 35 miles of riparian areas in E-14 classified as sage grouse broodrearing habitat to improve or provide forage and hiding cover for young chicks seems rather impractical and likely unnecessary. What are the historical numbers of grouse in this area and are the numbers stable, increasing or decreasing. What effect will such management have on other uses? Sage grouse have flourished under present management practices, so why change those practices? Who will pay for proposed treatments? Is it really prudent to optimize sage grouse populations as is herein proposed when optimum (maximum) numbers may have harmful effects on the habitat and on other wildlife species?
- 23 Introduction of moose into the Powderhorn Primitive Area would need to be studied in depth and all ramifications would need to be considered. Moose are not native to the area. They can cause substantial damage in the fragile riparian areas. Moose have a propensity for traveling great distances and can seriously impact ranching operations many miles away.
- The Wildlife Habitat Management Section with Alternative E is unnecessarily long, complex, redundant and vague. Considering how the wildlife populations have flourished under the current management practices, why change that proven management plan for a plan with unknown capabilities and consequences? Alternative E gives entirely too much emphasis in favor of wildlife at the sake of other recognized important uses, and this management should be kept in the balance provided by continuation of current management.
- 24 (8) Page 5-10 - Fishery Resources; Item 1 raises the question as to the meaning of the term "to enhance fisheries?" What does enhancement portend for other uses? What is the extent of an associated riparian area to a fishing stream? Projects for fishery improvement to be considered in activity plans (whatever this means) may unnecessarily slow accomplishment of such plans when fishery improvement is not realistically viable in many situations where intermittent streams are involved.
- 25 Item 2 under Alternative E calls for "intensively manage 58 miles of fishery streams" in Unit E-15; what does "intensively manage" mean and what does it portend for other important uses?
- 26 Item 3 calls elimination of livestock grazing in Willow Creek in allotment 6202 to allow it to recover by eliminating livestock grazing. Does this mean eliminating livestock grazing in the

Uses that compete with the butterfly include sheep grazing and the effect that trampling has on the ova and larvae, any activity that removes nectar sources, and birds. Threats to milkvetch populations include sheep grazing, herbicide treatments, OHV use, mining and wildlife use.

Management prescriptions to protect these special resources are found on pages 3-103, 3-116, and 3-119 of the DRMP. Estimated impacts are discussed under appropriate headings under Chapter Four in the DRMP.

10. Please refer to Chapter Four, Environmental Consequences, for a description of the impacts from management of all resources on all other resources. The discussion of impacts of the Preferred Alternative begins on page 4-55.
11. The BLM cooperates with the Colorado Division of Wildlife (CDOW) in establishing long range herd goals consistent with habitat capabilities and multiple use management mandates. We will continue to participate in the Colorado Habitat Partnership Program (HPP), and these goals will be periodically revisited. Landowners and ranchers and other publics will be given the opportunity to provide input into these goals.
12. The primary purpose in requiring watershed objectives to be met, according to Table N-1, before new forage is allocated to other uses is to permit an adequate vegetative cover to be established within treatments so that soil erosion is minimized or prevented. The anticipated fuels buildup from additional forage created is not expected to create a significant fire hazard.
13. Please refer to the Wildlife Habitat Management and Livestock Grazing Management sections in Standard Management for the PRMP, Chapter Four, for clarification regarding allocation of new available forage.
14. Known raptor nest sites, crucial big game winter range, elk calving areas, and sage grouse leks and habitat have been identified and mapped by BLM resource professionals and others for the past 15-20 years.
15. Interim herd goal reductions apply only to elk and deer. Reductions would be temporary until conditions improve, then game numbers would be possibly allowed to slowly increase to numbers recommended in Tables A-2 or A-3, Appendix A, of the DRMP. No economic analysis has been completed regarding these reductions (please refer to the response to comment 8 of letter 35), and this action would not adversely impact livestock operations or other users or uses occurring in the Planning Area.
16. The BLM would continue to work closely at all levels with the CDOW (the ultimate approving authority) regarding the reduction of big game numbers in certain locations now and in the future, as needed.
17. An objective in managing wildlife habitat on public land is to provide and maintain good habitat conditions, including within the recommended West Antelope ACEC. The referenced acquisition on Beaver Creek did not influence BLM's recommendations regarding big game wintering habitat within the ACEC, or the designation of the ACEC. A change to the language in the referenced paragraph in Table S-1 has been made to clarify that land uses in the recommended ACEC would be permitted so long as degradation of winter ranges does not occur. Please refer to Table 1-1, Page 1-18, in the PRMP for the modified language.
18. Please refer to the Glossary in the PRMP or the DRMP for this definition. In preparing an activity plan, all other resources that may be affected are considered and evaluated, as in an Allotment Management Plan or recreation area management plan. In some cases, other resources could be constrained in some manner. The

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elimination of competitive uses is not implied in the referenced language.

32

Item 5 attempts to quantify forage utilization levels by percentage for upland and minimum stubble heights in riparian zones. Such standards are too simplistic to accurately assess use in that they fail to consider type and variety of plants. It would seem that presently used and accepted methodology for assessing range use, condition and trend over a longer time frame would be better than the proposal in Item 4.

33

(10) Page 8-12 - Livestock Grazing Management. Item 1 under Alternative E should reflect the past situation of the AMPs/CRMAPs preparation rate has never yet been scheduled, and given future likely budget constraints, such future schedules are not likely to be achieved.

34

Item 3 thereunder brings to mind the fact that it has never been documented that reasonably managed livestock grazing is detrimental to water supplies.

35

Item 4 regarding restriction of land treatments and facility developments on 201,644 acres and excluded on 4,294 acres. The restriction on such vast acreage does not seem reasonable, and may, in fact, be counterproductive to the achievement of desired objectives. It would seem wiser to maintain a higher degree of flexibility in this matter than Item 4 provides.

Item 5 is unclear to this reader. What restriction is intended and what is the meaning of "...in addition to that use restricted from utilization limits..."? This item needs to be rewritten in more understandable form.

Continuation of Current Management Practices in livestock grazing overall is producing tangible improvement in range condition. Over the past 15 to 20 years, rancher/agency awareness and cooperation have provided steady improvement. While the drought of the past three years has perhaps slowed this improvement, the upward trend of the range continues on most allotments. Current management practices have provided for good stewardship of the range resource and is the alternative which should be adopted and retained. Alternative E contains too many ambiguous management statements to serve as well as the current management.

(11) Page 8-15 - Recreation Management - Item 1 under Alternative E provides for the acquisition of 40 acres of non-federal lands. Government entities presently own about 85% of all the land in Gunnison County. I strongly oppose BLM acquisition of any more private lands.

36

Item 3 says, "The remainder of the Planning Area would be managed for extensive recreation use, within the Gunnison ERMA. Does this mean all BLM lands in the Gunnison Resource Area? What does managing for extensive recreation use entail? Could it not conflict with other uses such as riparian management, wild life and fish propagation and grazing use?"

19. Although BLM does not have control over sage grouse harvests, we do have the management responsibility for a great deal of grouse habitat. As habitat conditions improve and increase (which may not require a large outlay of capital, but rather a modification of management practices), so should grouse populations, which should result in an increased harvest. In the judgement of BLM, the public lands could support approximately 9,000 sage grouse.

20. Possible techniques to increase forb and shrub species include planting seedlings, managing game distribution, implementing vegetation treatments, and improved grazing systems.

The effects of big game utilization on winter ranges on public lands has varied throughout the resource area. Monitoring studies conducted over the past 8-9 years show that, on the majority of BLM winter ranges, use levels have been within proper use levels. However, the plants in some locations do show that at one time use levels were much higher than in the past eight years, or those of today. This use may have occurred during the 1960s when deer populations in the valley were extremely high. Under existing range conditions, and with elk numbers maintained at around 4,700, and with deer numbers maintained at 8,830 or less in the long-term, (approximate 1985 levels), the carrying capacity for public winter ranges could be maintained.

Increases in forb and shrub species will not occur at the sake of all other uses.

If appropriate and feasible, activity plans of all kinds will consider opportunities to increase shrub and forb species on crucial big game ranges. Often, measures can be designed so that more than one resource benefits. Many times costs can be shared.

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entire allotment? Such a plan assumes the livestock grazing is the cause of the condition; has this been confirmed? Are there other causes? Can the area recover if grazing is permitted? Livestock furnish valuable feed for fish and consequently fish will suffer from livestock removal. What effect will big game have on recovery of the area?

27

Item 4 mentions that "compatible projects permitted in Unit E-2". What is a compatible project? Compatible to what? This is unclear.

Alternative E in Fishery Resources is ambiguous and will not serve the situation as well as will continuation of the current management practices.

28

(9) Page 8-10 - Livestock Grazing Management. Under Item 1 of Alternative E, what and where at the 6,757 suitable acres not available for grazing and the 46,200 suitable acres not available for grazing as set out in Alternative A. Have the full social and economic impacts of not having suitable land available for grazing been properly studied and evaluated? Have these impacts previously received wide public scrutiny?

29

In Item 2 it mentions some management units to modify existing allocations to resolve resource conflicts. This is most unclear. Does this mean that in the event of a conflict between different uses, livestock grazing will in each conflict see its allocation reduced? This flies in the face of the multiple use concept. What is the meaning of "livestock allocations could be modified further if studies or data indicate changes are necessary"? The use of the word, "further" implies that allocation modifications (downward) are already contemplated. This entire item is ambiguous. It carries the implication of the possibility of decisions being based on self-serving studies and data use, with highly subjective determinations. It provides a potential framework for possible elimination of grazing in many situations.

30

In Item 3, what are "watershed objectives"? What is "new" forage? Does this mean new growth? If a range is improving and additional available forage results, does this mean that livestock cannot use it, that it is committed to watershed objectives? This item could also be used in an arbitrary, subjective manner to eliminate or reduce grazing when the forage resource condition does not warrant such action.

31

In Item 4 does a cooperative noxious weed control program envision only livestock operators and BLM participation. Will the DOW pay a fair share based on benefits to be received by wildlife? Will other governmental units be required to pay a portion of the costs. Certainly, livestock have contributed very little in causing the bad noxious weed situation which exists today.

21. Potential lambing areas are those locations within bighorn sheep ranges that have physical characteristics that bighorn sheep need or depend upon for lambing, but have not yet been identified, or those that could be used in the future if sheep populations increase. Please refer to Chapter Two, Affected Environment, for descriptive information regarding bighorn sheep and their habitat, and to Chapter Four, Environmental Consequences, for a description of the effects upon other resources from bighorn sheep management.

22. Answers to your questions can be found on pages 2-26, 3-122, 4-61, and Appendix A of the DRMP. Some treatments could be cost shared; others would be funded by wildlife, and possibly volunteer or other assistance would be used.

23. Please refer to the prescription for Management Unit 2 in the PRMP for information on introducing moose into the referenced area.

24. To "enhance fisheries" is to improve the stream habitat for the target fish species.

A stream that is enhanced to a point near its potential condition would be expected to produce an amount of fish (number or pounds) at or near the amount it is potentially capable of. The riparian area associated with such a stream would be in a condition such that soil erosion would not be accelerated and forage production for wildlife and livestock would be near what those sites are capable of.

A fishery stream is most directly influenced by the riparian area adjacent to the stream, but fish habitat is also very much influenced by the condition of the riparian areas of the entire stream, including the intermittent head-water portions and

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Alternative E seems about as good a Continuation of Present Management, but it should be rewritten to clear existing ambiguities.

(12) Page 5-19 - Acquisition Of Non-Federal Lands. Alternative E provides for acquisition of certain private parcels, which acquisition this writer strongly opposes. Accordingly, the lesser evil of the alternatives offered is Alternative A, which I recommend.

(13) Page 5-22 - Areas of Critical Environment Concern. I do not agree that West Antelope Creek is properly designated as such. Accordingly, I recommend that it either be dropped from Alternative E or that Alternative A be adopted.

37 (14) Page 1-5 - Topics Not Addressed In The TMP/EIS are identified below along with rationale for not addressing them. What follows on the next page does not seem to be those topics and rationales? What are these topics?

38 (15) - Page 1-6 - Entitled "Chapter 1" seems out of place having page 1-5 entitled "Introduction" followed by page 1-7 entitled "Introduction". This destroys the continuity of the report and adds to its confusion. On Page 1-6, C., in Planning Criteria, maintaining erosion condition class of slight/moderate, etc., exact soil composition in an area must be considered along with the gradient slope of that riparian area and the character of the area which it drains. Mountain cloud bursts can badly erode any steep riparian area serving a large steep drainage area with soils tending on the impervious side. Big game use in riparian areas must be considered, and responsibility should not be ascribed solely to livestock.

39 On Issue 4, the issue should be restated to include all multiple uses and their importance to local economies (not just recreation and tourism). All uses have a strong inter-relation. For instance big game are highly dependent on feed on private ranch lands during the critical winter months. The tourists and recreationalists love the green meadows, operated and sustained by the rancher's efforts. When livestock grazing on federal lands is reduced, or otherwise impacted, it lessens the ranchers' ability to provide big game feed and retain manicured meadows. Ranching makes its contribution year around while tourism and recreation tend to be concentrated in short seasons. All public land uses provide important contributions to the social-economic fabric of this area which has evolved over a long period of time.

40 (16) Page 2-13 - Under the surface water section, responsibility for riparian condition is placed on livestock grazing without any regard given for big game use or other factors such as damaging fires or road draining interference.

tributaries. Documented cases exist that demonstrate that fisheries have been restored in intermittent streams that became perennially-flowing after improvements to the riparian zone.

25. Intensive management of fishery streams is the action needed to improve or maintain these streams in an acceptable condition (near the potential condition). Intensive management may also mean an improvement in recreational opportunities and additional forage for livestock and wildlife.

26. Livestock grazing management language for Management Unit 7, proposed West Antelope Creek ACEC, is clarified in the PRMP. Livestock grazing would be excluded only from the North Willow Creek riparian zone of Stevens Creek Common Allotment (6202), and when riparian conditions have improved sufficiently, grazing would be authorized. Please refer to the prescription for unit 7 in Chapter Four of the PRMP.

27. Please see the response to comment 7 of this letter.

28. A description of the areas and the 6,757 acres in various management units that would not be available for livestock grazing in Alternative E, along with rationale for their not being available, can be found in Chapter Four, beginning on page 4-66, IMPACTS ON LIVESTOCK GRAZING MANAGEMENT, in the DRMP. The 6,757 acres that would not be available are also discussed in the description of Alternative E in Chapter Three of the DRMP.

In Alternative A (Continuation of Current Management), the lands suitable for grazing that are not available for grazing include Elk Pasture (on The Lake Fork of The Gunnison River), Red Creek and East Elk Creek (below the Sapinero State Wildlife Area), North Beaver Creek (above the Gunnison Wildlife Area), a portion of West Antelope Creek, Wildcat Creek drainage near Crested Butte, Sapinero State Wildlife Area, and the Gunnison Wildlife Management Area. In the PRMP, please refer to the first paragraph of the Livestock Grazing Management section of STANDARD MANAGEMENT, Chapter Four, for revised language regarding lands unsuitable or unavailable for livestock grazing.

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41 (17) Page 2-17 - Under riparian zones, it mentions that cattle spend a disproportionate amount of time in riparian areas, failing to mention that big game, likewise, spend a disproportionate amount of time in those areas. It also ascribes over use by livestock (without placing any responsibility on big game) and physical damage to roads as lowering the vegetative and hydrological condition and the value of riparian areas. All factors affecting riparian condition should be fairly presented in this section.

(18) Page 2-23 - This indicates that elk numbers have slowly increased since the 1950's. In fact elk numbers have undergone a spectacular increase, being the highest in recorded history and far exceeding the ability, year in and year out, of the winter habitat to sustain them. Burgeoning numbers have created an artificial "bubble" which will burst with the first long, cold, early heavy snow fall winter when suffering and starvation will enslave the herd as it did a few years back.

42 It makes previous little sense for the BLM to commit additional resources and restrict other historical uses to perpetuate an artificial big game scenario that will never be practically sustainable over a long period of time. Rather, the DOW should be pressured to reduce present big game numbers to a realistically sustainable number and bring herd objective numbers down to that same level. Present big game management will prove unfair to the animals themselves, and grossly unjust to the private property owners whose standing feed and hay the big game is becoming more and more dependent upon during the winter season when the big game feed demand has outstripped their winter habitat.

It is realized that the DOW manages the wildlife and the BLM has no authority to dictate numbers to the DOW. Still the BLM has no obligation to give in "blindly" to the DOW when the BLM furnishes so much of the resource to the DOW free of charge. The BLM seems almost captive to DOW policy and in the interests of better management of the federal lands the BLM should act more independently of the DOW and should become more assertive about big game numbers. This document in many ways seems unduly slanted to wildlife and other multiple uses.

Please note per Table 2-17 on Page 2-24 private land owners are furnishing 40% of the deer wintering habitat and 25% of the elk wintering habitat, all without compensation, unless damages can be proven according to strict procedural guidelines. This writer believes that, as of recently, these percentages are understated, and will be more grossly understated unless numbers are reduced. Furnishing so much big game habitat without charge impacts economic viability of the ranching community in a serious, threatening way.

29. Recommendations in the DRMP and PRMP to modify how grazing is currently managed in some Management Units do not mean that livestock forage allocations would be recommended each time a conflict between uses occurs. The statement regarding further modification of livestock allocations means that, if monitoring or studies indicate the necessity to change how grazing is occurring in a unit, such changes would be made. This is a standard operating procedure that would be implemented according to existing policy and regulations, and with full consultation, cooperation, and coordination with applicable parties. See the first paragraph of the Livestock Grazing Management section of STANDARD MANAGEMENT in Chapter Four, and item 4. under the subheading "Grazing Administration" in the PRMP, for revised language regarding adjustments in forage allocations.

30. The term "watershed objectives" in the context of allocating forage, or vegetative resources, means the percent of vegetative cover that would have to be established and in place on various ecological sites before any forage could be allocated for livestock (or wildlife) objectives, such as to reactivate suspended AUMs. "Watershed objectives" are expressed in terms of percent basal vegetation cover and are used to determine the potential for soil erosion (eg. the higher the percentage of basal cover, the lower the potential for soil erosion). Please see Appendix N in the PRMP for the general percent of cover that would be required to meet watershed objectives on various ecological sites in the Planning Area, before new available forage could be allocated for other uses. Also, a reference to Appendix N can be found on pages 4-5 and 4-9 in the PRMP, under the subheadings "Wildlife Habitat Management" and "Range Improvements".

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On this same page the general condition of winter browse species in various areas is set out. Must not all-time record numbers of big game bear substantial responsibility for these conditions, rather than blaming livestock grazing as this report does on page 2-25 when it discusses riparian conditions. Certainly the big game graze these areas in early spring when the plants are most fragile and subject to damage.

Relative to the Big Horn sheep in the Cebolla Creek area, all of the efforts to date would rate no more than a grade of D - based on ten survivors in the herd. Also per Table 2-19 on Page 2-25 populations are primarily declining. It's far fetched to attribute this to habitat condition. When will the next Pasturella outbreak hit? Or will it be lung worms?

44

(19) Page 2-26 - Why is the condition of the antelope habitat based on a 1978 range survey? Regarding sage grouse, whereas the report states that numbers have increased above the mid-1960's numbers but still remain well below their potential. What are the historical numbers that such a general, unsupported statement is based upon. Who determines the realistic, desirable potential and what is it? A lot of experience shows that sage brush treatments enhance sage grouse populations and this writer sees more sage grouse in areas of regular livestock grazing than others. Frankly, the vagaries of the weather and predator concentrations have a greater affect on sage grouse numbers than does the habitat or hunting pressure. There is so much good sage grouse habitat now that it is not realistic to call for additional measures or use changes in a futile effort to further increase sage grouse numbers.

45

(20) Page 2-26 - Fishery Resources - It is this writer's personal observation that certain of the streams listed in Table 2-20 at times have undergone intermit flows or dried up completely, and that those streams are not viable fishing streams.

(21) Page 2-28 - Livestock Grazing Management. This writer personally recalls the process of evolution of the June 1981 EIS and the countless manhours and hundreds of thousands of dollars (expended by both the BLM and affected parties). What a waste and exercise in futility it was! Realism was set aside in the quest for the process and the documents. For instance, to date only 28 AMP's have been implemented out of 146 grazing allotments. (Now, this document envisions completion of only one to two AMP's per year.)

46

(22) Page 3-1 - In the discussion of Alternative E, the preferred alternative, it states "where production/development is proposed, other resources would be protected as much as possible by placing limitations on such uses as mineral leasing, OHV use and livestock grazing." This is not a clear statement. What production/development? If OHV use is to increase, will stipulations or limitations be placed on grazing. If, as in the

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first sentence of the paragraph "...public lands resources would be managed to provide for both production or development and for conservation or protection," how can limiting certain specified uses be consistent therewith? This placement of stipulations and limitations on mineral leasing, OHV use and livestock grazing seems but a thinly veiled disguise to possibly be used in almost every situation as a pretext to curtail these uses. In the last sentence of the paragraph it appears to prioritize conservation/protection over production and development, making this inconsistent with the first sentence of the paragraph which tells how resources would be managed.

How can this preferred alternative be wisely used and applied when within its own definition and description, discrepancies exist? Certainly, this alternative bears deeper scrutiny and these aforementioned inconsistencies must be reconciled.

47

(23) Page 3-2, the last sentence in the first column states, "Therefore, no ranking order of resources was developed." This is in conflict with what was previously set out on Page 3-2 in the discussion of Alternative E wherein "stipulations and limitations on uses such as mineral leasing, OHV use and livestock grazing" would be placed. This further illustrates the inconsistencies inherent in the definition and description of Alternative E and in any implementation of its use.

(24) Page 3-3 - Alternative A. This alternative has worked well in the past, provides more management flexibility, is better understood because of its past use and allows broader oversight as opposed to Alternative E. It is obvious that no agency would want to spend the kind of time and money required by this report and come up with the fact that they could not improve on present practice, but as far as the alternatives set out herein, including Alternative E, such seems exactly to be the case. However, even under Alternative A, big game numbers need to be curtailed and habitat management needs to reflect such a curtailment.

In conclusion, this writer supports Alternative A over Alternative E. Further, the many long hours which this writer has spent studying this document compels him to send on the following comments relative to it:

- (1) It is unduly long, complicated, repetitive and ambiguous to the extent that it is confusing to such a degree that it discourages reader participation and understanding, and leads one to believe that more emphasis may have been placed upon the process itself than on practical conclusions of further management practices. One must wonder if the alternatives were not pretty much decided "early in the game" and if the report was then not subsequently written as justification for such decision.

The term "new forage" means the new vegetative growth from land or vegetative treatments, or other sources.

Forage occurring as a result of natural causes or changes in grazing systems or other sources, for instance from non-use in an area, would not be considered new forage. Utilization of this forage would be according to the Livestock Grazing Management section of STANDARD MANAGEMENT and individual Management Unit prescriptions in the PRMP.

31. An effective noxious weed control program should, optimally, include participation from all parties who might be impacted from these plants, and who would benefit from a control program. Exact details on sharing the financial or operational burdens are not known at this time.

32. The concept that forage plants, most importantly grasses, are best managed if the utilization levels are moderate or less is well documented. The BLM uses 40-60% as the range for moderate utilization. The objective of the moderate level of utilization is to maintain the forage plants in acceptable vigor for sustained yield and to maintain cover to prevent soil erosion. By using forage grasses to no more than moderate use levels it can be expected that the trend of the ecological condition of rangelands would be static to upward.

In several places throughout the western states, managers that have been successful in improving riparian areas and maintaining those in good condition are recommending that utilization by livestock and wildlife to be limited in some manner, and more recently, minimum stubble heights have been recommended. By leaving a stubble of 2 1/2 inches the vigor and associated forage production of grasses can be increased and sustained. More importantly, riparian areas would be able to function hydrologically to the benefit of land users, that is, runoff would be captured and stored in riparian aquifers rather than continue downstream. The production of riparian plants to provide livestock and wildlife forage as well as other uses would be greatly enhanced. Without proper utilization levels and minimum stubble heights, riparian areas would remain below their potential to provide important renewable resources that many people depend upon. Moreover, continuing degradation could result in a loss of dollars and energy.

33. Please refer to the response to comment 9 of letter 35, and to page 3-3 of the DRMP for discussions of budget needs to implement the referenced actions. The increase mentioned on page 3-3 of the DRMP would apply to the PRMP as well. Please also refer to the discussion of activity plans under Livestock Grazing Management in the STANDARD MANAGEMENT section of Chapter Four in the PRMP.

34. The restrictions on range treatments or projects mentioned in Table S-1, page S-12 under the Preferred Alternative column, are not exclusions of treatments. Some examples of these restrictions are

(1) the requirement that plans for surface disturbing activities contain measures designed to minimize negative effects to adjacent recreation, fisheries, and riparian values (unit E-1, 95,350 acres); and

(2) the requirement that vegetative or land treatments be compatible with the objectives of managing the Powderhorn Primitive Area SRMA (unit E-2, 47,745 acres); and

(3) the requirement that livestock management projects would have to be compatible with, and not conflict with, the capabilities of the resources to support wintering populations of elk, deer, and bighorn sheep in the West antelope Creek ACEC recommended in unit E-7.

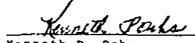
APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Bill Bottomly
Page 12 - 5/31/91

38

(2) The writer cannot help but ponder the thousands of man-hours and hundreds of thousands of dollars which were expended in the preparation, printing and distribution of this report and wonder aloud if such efforts and money would not have been better spent on tangible and physical improvements to the subject lands. The same comments were made some 10-12 years ago relative to the EIS which was prepared for this area at that time and most observers will freely say that money and time spent on that document was pretty much wasted when compared with the benefits they would have wrought had they been spent directly on the resources in the area.

Respectfully submitted,


Kenneth P. Ochs

Other restrictions can be found in the prescriptions for units E-10 through E-15.

35. The referenced language in the DRMP was indeed confusing and has been revised in the PRMP. The restrictions on livestock use that the paragraph refers to include changes that would be implemented in various management units (units 1, 2, 3, 4, 5, 10, 14, and 15), such as, a requirement that livestock grazing be compatible with management unit objectives, seasonal limitations on grazing or changes in the kind of livestock authorized. The restrictions referred to include changes in how grazing is currently administered, and do not include range treatment restrictions or exclusions, or actions that would possibly result in a reduction in AUMs.
36. Please see the discussion on page 2-33 of the DRMP for information on the Gunnison ERMA. The Supplemental Program Guidance (BLM Manual 1623.4) requires that all public lands administered by BLM be classified for "special" or "extensive" recreation management. Historically, all public lands were managed as *de facto* ERMA's, and in fact, it is the type of recreation most closely associated with the public lands (see page 2-31 of the DRMP for a definition of "extensive" recreation. It is not anticipated that providing for recreation on public lands in the ERMA would, to a significant degree, impact any other uses.
37. The topics on page 1-6 of the DRMP are the Planning Issues and Criteria that are referenced in the second paragraph of page 1-5. See the top of page 1-7, Chapter One, DRMP, in the left-hand column for the continuation of the section titled "TOPICS NOT ADDRESSED IN THE RMP/EIS".
38. Throughout the DRMP, chapter numbers, such as "CHAPTER ONE", appear at the top of all odd-numbered pages; Chapter content, such as "INTRODUCTION", appears at the top of all even-numbered pages, for continuity. This is standard for documents of this type.
39. The slight/moderate erosion condition class is determined by both soil and vegetation factors. Presently, there is no classification for riparian areas, so the reference made on page 1-6, Planning Criteria 1-C, pertains to uplands only.
40. Consideration was given to modifying the language in Issue 4, page 1-6, DRMP, to include all multiple uses, other single uses or resources, or combinations of several resources or uses occurring on public lands. All uses occurring on public lands are included in the Issue, in that they were all addressed indirectly in resolving the Issue(s) in the various alternatives. The BLM agrees that all uses occurring on public lands, including wildlife habitat and livestock grazing management, provide important contributions to the social and economic fabric within the Planning Area. Alternative C in the DRMP especially recognizes this contribution, as do the other alternatives. Issue 4 is relevant in the DRMP because of the importance of tourism, travel, and related economic and social factors occurring in the Planning Area. Ranching is a grass-roots industry in the Planning Area, to be sure. The continuation of this industry on public lands is important to ranchers, BLM, and the general public. Much of the recreation setting referred to in the Issue that the general public sees are the landscapes in the Planning Area. Public lands used for livestock grazing, and ranches and farms are a major part of most landscapes in the Planning Area. The long-term benefit to, and improvement that is anticipated in livestock forage conditions, vigor, and distribution, and the anticipated improvements in forage quality and quantity on public lands in the Planning Area (see page 4-68, DRMP) as a result of implementing the PRMP would not be changed by the modification of language in Issue 4.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

41. The comment refers to language in the bottom two paragraphs, left-hand column, page 2-13, DRMP, in the Surface Water Quality section of WATER RESOURCES.

Overgrazing by livestock in riparian zones is a common and surface-disturbing activity in these areas. Other activities potentially impacting riparian zones such as roads, water developments, mining, timber harvesting, and off-road vehicle use are discussed elsewhere in the Surface Water Quality section on page 2-13 of the DRMP. Natural wildfires do not commonly cause significant impacts to healthy riparian zones.

Rangeland monitoring studies conducted over the past 5 years indicate that, while big game do utilize riparian areas, the time big game spend in riparian areas and the total forage consumed is typically small when compared to cattle. Damage to riparian areas caused by roads, while significant in some areas, is far less widespread than damage caused by the heavy or severe overuse by cattle.

42. Please see the response to comment 11 of this letter.

43. Please see the response to comments 11 and 20 of this letter.

- 44 and 45. Regarding the 1978 range surveys, this is the latest information available regarding conditions of range lands.

Please see the response to comment 5 of this letter regarding sage grouse information.

- 46 and 47. The term "production/development" refers to those uses such as development of mineral leases, OHV use, livestock grazing, timber harvesting, and mining; these are commonly referred to as commodity uses. It is standard practice, and has been for many years, to mitigate impacts associated with commodity uses by stipulating limitations on these uses (eg. seasonal closures for oil and gas activities to protect wildlife, limiting OHV use to designated roads to reduce soil erosion, and developing grazing systems to restore plant vigor and increase vegetation cover. Also, through the RMP process, BLM attempts to balance the conflicting mandates of multiple use with the wants and needs of the various user groups and the general public.

Because management themes and emphasis in Alternative E (in the DRMP) and the PRMP vary from unit to unit, an overall resource ranking was not deemed appropriate.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letters 39 and 40

1. See the response to comment 2 of letter 8.

39
5-28-91

Erich Hill
P.O. Box 731
Vail, CO 81658

Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 South Townsend Avenue
Montrose, CO 81401

Dear Sir:

I am writing concerning the designation of the Alpine Triangle, East Gunnison, Cebolla Creek and West Antelope Creek as Areas of Critical Environmental Concern (ACEC). They desperately need this to occur and be part of a wilderness preservation strategy.

The Alpine Triangle is an area that contains 14,000 feet peaks, bighorn sheep habitat, rare butterflies and beautiful river and there surrounding lands. They need the protection of the ACEC designation.

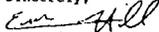
The East Gunnison is an area that has been over grazed by cattle and is as critical habitat for elk and deer wintering.

1 The ACEC designation would help the bighorn sheep become a self-sustaining part of the ecology in the Cebolla Creek area.

West Antelope Creek area is habitat for deer, elk and bighorn sheep. Overgrazing has caused problems in this range land. ACEC designation would result in restoration of the natural condition that should exist.

There are many reasons to do this, but the major reason is that we owe it to mother earth and are own long term survival. Let there be wilderness and biodiversity. Thank you for your time and effort to preserve our planet for all life.

Sincerely,


Erich Hill

40
5-28-91

Kristan Pritz
P.O. Box 731
Vail, CO 81658

Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 South Townsend Avenue
Montrose, CO 81401

Dear Sir:

I am writing concerning the designation of the Alpine Triangle, East Gunnison, Cebolla Creek and West Antelope Creek as Areas of Critical Environmental Concern (ACEC). They desperately need this to occur and be part of a wilderness preservation strategy.

The Alpine Triangle is an area that contains 14,000 feet peaks, bighorn sheep habitat, rare butterflies and beautiful river and there surrounding lands. They need the protection of the ACEC designation.

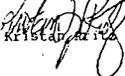
1 The East Gunnison is an area that has been over grazed by cattle and is as critical habitat for elk and deer wintering.

The ACEC designation would help the bighorn sheep become a self-sustaining part of the ecology in the Cebolla Creek area.

West Antelope Creek area is habitat for deer, elk and bighorn sheep. Overgrazing has caused problems in this range land. ACEC designation would result in restoration of the natural condition that should exist.

There are many reasons to do this, but the major reason is that we owe it to mother earth and are own long term survival. Let there be wilderness and biodiversity. Thank you for your time and effort to preserve our planet for all life.

Sincerely,


KRISTAN PRITZ

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

L. RICHARD BRATTON
ATTORNEY AT LAW
232 WEST TOMMICH AVENUE
P.O. BOX 888
GUNNISON, CO 81230
(303) 644-1908
June 3, 1991

41

Response to letter 41

- 1. After reviewing the comment and the tract, these lands have been identified as a Category One tract in the PRMP. In addition, the tract, identified in the tract in the Appendix D, DRMP, Alternative A (Continuation of Current Management), and totalling 66.58 acres, has been expanded to include an additional nearby 4.39 acres in Sections 11 and 14. Please refer to Appendix D in the PRMP for an updated list of the Category One tracts for the PRMP. The PRMP map also shows the location and general configuration of all category One tracts.

Mr. Bill Bottomly
RMP Team Leader
Bureau of Land Management
2505 South Townsend Avenue
Montrose, Colorado 81401

Re: March 1991 Draft, Gunnison Resource Area,
Resource Management Plan and Environmental
Impact Statement

Dear Mr. Bottomly:

On Page D-1 of the above-referred plan is Appendix D entitled "Disposal Tracts, Acquisition Criteria, Rights-of-Way Corridors, and Lands and Realty", the sub-category on that page is entitled "Alternative A Category I Disposal Tracts". Item 12 thereof reads as follows:

"12. T. 44 N., R. 4 W., Sec. 11: Lots 2, 3, 4, and 7 - 66.58 acres irregular shaped parcel, difficult to manage."

I represent W. R. Goddard who owns property in the LakeFork Ranch which adjoins said Tract 12. As such, he is intimately familiar with said Tract 12.

Mr. Goddard had asked me to advise you that it is his recommendation that you place Tract 12 in a category whereby it could be disposed of by sale as it has little, if any, value to the public. Although technically it might be utilized for access from Highway 149 to public lands, as a practical matter this would be virtually impossible. The cost of constructing a road would be prohibitive as the terrain is steep and it would require the construction of a bridge which would be very expensive. Foot access is also impractical as the Lake Fork of the Gunnison River would be difficult to cross at all times and impossible some times, therefore, necessitating the construction of a bridge which would be expensive.

Very truly yours,

L. Richard Bratton
L. Richard Bratton

LRB/lms

cc: Mr. W. R. Goddard
Mr. William C. Hall
Mr. Barry Tollefson

42

Responses to letter 42

- 1 and 2. See the responses to comments 1 and 2 of letter 8, respectively.

June 3, 1991

Mr. Bill Bottomly
RMP Team Leader
BLM
2505 South Townsend Ave
Montrose, CO 81401

Dear Mr. Bottomly:

I am writing to comment on your draft RMP/EIS for the Gunnison Resource Area.

1 I am surprised you did not include the Lake Fork of the Gunnison for Wild and Scenic river designation. I have fished sections of this river, fished that of it and I am quite familiar with all segments of the river. Not only is it scenic (and great fishing), but it deserves Wild and Scenic protection for its unusual volcanic geologic features, not to mention the Elungullion Slide area. I strongly encourage you to reconsider your recommendation.

2 I also think you have made a major mistake by not including the Alpine Triangle, the East Gunnison, Cebolla Creek for ACEC designation to better protect the outstanding wildlife habitat found in these areas. Even a novice can see significant evidence for cattle overgrazing in these areas at present levels of cattle allotments.

I do want to make special note of your proposed ACEC designation for the West Antelope Creek drainage. I very much approve of this action!

Thank you for your interest.

Sincerely,

John M. Ritchey

John M. Ritchey

500 Alpenglow
Durango, CO 81301

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES



TECK RESOURCES INC.

1199 WEST HASTINGS STREET
VANCOUVER, B.C. V6E 2K5

TEL (604) 667-1117
TELEX 04-507700

Response to letter 43

Thank you for your letter.

31 May 1991

43

Mr. Bill Bottomly
RMP Team Leader
U. S. Department of Interior
Bureau of Land Management
2505 South Townsend Avenue
Montrose, Colorado 81401
U.S.A.

Dear Mr. Bottomly:

Re: Gunnison Resource Area
Draft Resource Management Plan and Environmental Impact Statement

We have reviewed the above referenced report and commend the BLM on their preparation of a substantial evaluation of options for the future management of Federal Lands in the Gunnison Resource Area. We support the planning team members in their examination and evaluation of the Preferred Alternative (Alternative E) since we view it as permitting a balance of environmental protection, resource management and development to proceed in a sustainable and equitable fashion. We endorse the position taken by the project team that the preferred alternative "represents the mix and variety of actions that best resolves the issues and management concerns that drove the preparation of the RMP/EIS".

Yours very truly,

TECK RESOURCES INC.

Michel P. Filion, P. Eng.
Director, Environmental Affairs
Teck Corporation

MPF-081

Responses to letter 44

1, 2, and 3. See the responses to comments 1 and 2 of letter 8, and comment 2 of letter 12, respectively.

Mark Pearson
P.O. Box 284
Grand Junction, CO 81502

June 3, 1991

44

Bill Bottomly
RMP Team Leader
Bureau of Land Management
2885 S. Townsend Ave.
Montrose, CO 81401

Dear Bill:

I have reviewed the draft Gunnison Resource Area RMP and EIS and have the following brief comments.

1 I disagree with the determination that the Lake Fork of the Gunnison is unsuitable for designation as a Wild and Scenic River. The Lake Fork is without a doubt one of the most scenic rivers in all of Colorado. It is not possible to distinguish the scenic qualities of the river from the scenic qualities of the valley surrounding it. The guidelines for the Wild and Scenic Rivers Act suggest a river corridor 1/4 mile in width be established on either side of the river. For the Lake Fork above Lake San Cristobal, this would extend the protected corridor to the base of the surrounding valley walls in most cases. Surely, the valley floor of the Lake Fork possesses outstandingly remarkable scenic features in anyone's estimation.

2 I am pleased to support the six ACECs proposed in the RMP. The West Antelope ACEC is particularly important because of its emphasis on management for diverse wildlife habitats. BLM should similarly emphasize wildlife management for the winter range on public land east of Gunnison, and the preferred alternative should be revised with the addition of the East Gunnison ACEC.

3 The Redcloud Peak ACEC is apparently designated only for protection of the butterfly habitat. If BLM declines to recommend the upper Lake Fork suitable for Wild and Scenic river designation, then the Redcloud Peak ACEC should be expanded to include the full extent of the Alpine ACEC considered in Alternative B. The butterfly habitat is important, but there are many other natural values deserving of emphasis in this area and the Alpine ACEC designation would help to achieve those. BLM should also consider adding the Cebolla Creek ACEC to its preferred alternative for protection of the bighorn sheep habitat.

3 The entire Resource Area should be limited to designated roads and trails. There is no justification for creation of new ORV routes anywhere in the Resource Area. I have seen time and again how ORVs spread cancer-like into any area where they are not strictly prohibited. BLM should get ahead of this problem by immediately limiting all vehicle use to designated routes.

Sincerely yours,

Mark Pearson

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 45

2251 South Zeng Court
Lafayette, Colorado 80228
May 18, 1991

45

1 through 5. See the responses to comments 1, 2, and 3 of letter 8, and comments 5 and 1 of letter 11, respectively.

Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Bottomly:

You must strengthen the protection of ecological values in the Gunnison Resource Area. The RMP/EIS inadequately addresses resource protection and the impact of livestock operations.

1 All of the Lake Fork River, from its headwaters in the Handies Peak proposed wilderness to Blue Mesa Reservoir, should be designated a Wild and Scenic River. Some of the most outstanding scenery found on BLM lands nationwide surrounds this river. The visual, geologic, recreational and biological values here must be preserved with Wild and Scenic status.

2 Habitat for bighorn sheep and the rare Uncompahgre Fritillary must be protected in an ACEC encompassing the Alpine Triangle. Without hesitation I state that protection of this area will result in protection for other potentially threatened and endangered species about which little is known--as is the case with the rare butterfly. ACEC designation is necessary for the entire Triangle to protect lands beyond the Lake Fork corridor.

3 Public lands immediately east of Gunnison are crucial deer and elk winter range. ACEC designation will protect them from the grazing abuses so prevalent in the area. ACEC designation of the Cabolla Creek area would protect bighorn sheep habitat and facilitate recovery of a self-sustaining population there.

4 BLM's intention to protect West Antelope Creek with ACEC designation is commendable.

5 The RMP/EIS must allow for riparian and range recovery in the Gunnison Resource Area. Livestock must be kept out of wetlands and riparian areas. Streambanks must be stabilized. Erosion and sedimentation due to livestock operations must cease to protect aquatic plants and animals and their habitats. Water quality must be restored and protected. Priority must be given to wildlife of all species for forage. The RMP/EIS must consider reducing livestock numbers in some areas and closing some abused allotments entirely. So-called "range improvements" such as chaining, roading, tank-building and etc must cease. The RMP/EIS must address these in great detail. If necessary, livestock operators will have to find alternative means of running their businesses to allow public lands in the GRA to return to health.

Sincerely,
John Samuel
John Czarniecki

Colorado
State
University

Department of Fishery and
Wildlife Biology
Fort Collins, Colorado 80523
(303) 491-5000
FAX (303) 491-5091

June 5, 1991

Bill Bottomly
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

46

Dear Mr. Bottomly:

I realize that the closing date for written comments on the Gunnison RA Management Plan has passed. However, I do have these suggestions, and thought that you might still be able to incorporate them, at least into the plan's application.

Thank you for your consideration.

Sincerely,

James A. Bailey
James A. Bailey,
Professor Emeritus
Wildlife Biology

cc. Don Whittaker, CMS
CDOW, Gunnison

Responses to letter 46

1. The comment refers to Chapter 2, which describes the existing situation as of the time of publication of the DRMP; the existing situation may not be optimum for a given species. BLM recognizes, however, that bighorn sheep herds of less than 100 animals are probably not viable in the long term, and whenever possible in a unit we would manage for 100 or more animals.

Our goals are to initiate a habitat manipulation project to remedy the concern of monotypic habitat. Plans include a burning and logging program in the Devils Hole/Rock Creek area to open up dense timber stands in order to improve migration routes, and give sheep an opportunity to move to other habitat types.

The migration corridors and winter and summer ranges are well known and identified in most areas, but information regarding lambing grounds is limited. We are continually inventorying for these areas. Inventory efforts are on-going to eliminate data gaps.

2. The Preferred Alternative contains provisions that would limit the distance between areas grazed by domestic sheep and bighorn sheep to 4-5 miles for herds in unit E-10, but in the areas south and west of Lake City and in the Lower Lake Fork Canyon, the grazing areas would continue to be intermingled.

3. Our information regarding the referenced economic benefits is based on all our available data. It is also difficult to describe the economic benefits from the aesthetic values these animals provide. The small number of sheep is the limiting factor and not hunters, as stated in the DRMP. The demand for an opportunity to hunt sheep is far greater than available permits.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

46

COMMENTS REGARDING BIGHORN SHEEP MANAGEMENT IN THE BLM GUNNISON RESOURCE AREA PLAN AND EIS (J. A. Bailey)

My major concerns are three:

1. There is an obvious lack of recognition of the disease threat posed by domestic sheep on bighorn ranges. There is no commitment to reducing this threat, or to avoiding it in the future.
2. There is no recognition of the concept of a minimum viable population size for bighorn sheep. Elsewhere (BLM Range-wide Plan for Managing Habitat of Desert Bighorn Sheep on Public Lands) the BLM has recognized 100 animals as a viable population. The Desert Bighorn Council (Wilson et al. 1980) recommends 125. In the Gunnison RA, there is no commitment to maintaining populations of viable size.
3. There is a narrow view of what constitutes a quality year-round bighorn range, with up to six seasonal ranges and associated migration corridors. Instead, there is emphasis only on lambing areas and winter ranges. This narrow view implies a continued commitment to the current limited numbers of sheep in the RA.

Specific comments:

p. 2-25. Concerns for bighorn sheep should include:

1. Populations of <100 wild sheep are probably not viable in the long term.
2. If some herds are sedentary and do not have access to a variety of vegetation types, this should be a concern. Herds in limited, monotonous habitat do not respond well to variation in weather, or to human harassment.
3. It should be a concern that all seasonal ranges, including lambing areas and migration corridors, are not known for each herd. We can't manage or protect habitat if we don't know where it is.
4. The degree of separation of wild sheep from existing grazing areas of domestic sheep should be stated for each bighorn herd. Recommended distances between wild and domestic sheep, should be cited from the literature. Do not "hide" the threat of domestic sheep.
5. The potential economic benefits to local communities from sheep hunting or sheep watching are probably understated. Those benefits are not due to the relatively small number of sheep hunters, as stated, but are due to the small numbers of sheep.

p. 3-8. It is not clear if the commitment to locate seasonal ranges of bighorns applies to all 4 herds currently in the RA. In addition to seasonal ranges, migration corridors should be identified. "inventories" to be "conducted" is vague. The only way to efficiently and effectively locate seasonal ranges and migration corridors is with a year-round radio telemetry study on each herd.

46

It is not clear here if any of these bighorn herds are threatened by nearby domestic sheep. (Some clarification exists in the appendix. It appears that domestic sheep are present on at least 3 of the 4 wild sheep ranges). The expense of studying the wild sheep may well be a wasteful "displacement activity" unless there is a commitment to separate wild and domestic sheep - presumably by removing domestic sheep, or by declaring some allotments as permanent cattle-only allotments.

p. 3-17.

1. The goal of 500 bighorns should include that each separate herd should be at least 100 animals, a viable population size.
2. Inventories to identify suitable transplant sites for bighorns should not be limited to identifying lambing areas and winter ranges. Summer ranges, mineral licks, rutting ranges and migration corridors are also important for establishing a non-sedentary, viable herd. Note that many transplants have been failures, presumably in part due to inadequate selection of transplant sites.

p. 3-51. Comments re. p. 3-17 apply here also. In addition, a goal of 50 bighorns probably is not a viable population, especially if the sheep are to be in 2 or more herds. (This is not clear.) As I read it, this alternative may imply loss or elimination of one or more existing herds. Which one(s) is(are) expendable?

p. 3-71. It is unclear what factors might influence the "carrying capacity of the habitat" for bighorns. Will bighorn ranges be grazed by any livestock in this option?

The above comments regarding limitations of inventories to identify suitable transplant sites; regarding goals for population sizes; and especially regarding a commitment to isolating wild sheep from domestic sheep; also apply here.

It is not clear what is meant by "monitoring studies" within bighorn ranges.

p. 3-104. See above comments regarding:

1. a need for comprehensive analysis in choosing bighorn transplant sites;
2. a need to clarify the goal of 500 wild sheep by declaring a goal of at least 100 sheep per isolated herd;
3. a need to identify all components of the year-round range of existing herds, not just lambing areas and winter ranges, using radio telemetry;
4. a needed commitment to keep wild sheep isolated from domestic sheep.

Also, I don't know what "monitoring studies" are (again); but why are they applied to pronghorn and not to bighorn in this option?

pp. H 6-7. The numbers of bighorns present in ACECS 9 or 10, and 11 do not agree with the numbers given on p. 2-25.

4. The BLM is committed to do the best we can with the limited funds available to learn more about sheep movements and to continually update information on seasonal ranges. The magnitude of the inventories would depend on our funding and available manpower. BLM's goal is to eliminate data gaps regarding seasonal sheep ranges, but that goal is contingent on funding and staffing levels.
5. Please see the response to comment 1 of this letter.
6. Future inventories to identify suitable transplant sites would analyze all the components mentioned in your letter, as well as evaluating the effects to other resources.
7. In Alternative C, there is a likelihood that bighorn sheep in the Lower Lake Fork Canyon and the area south and west of Lake City would be at risk, and could disappear from this area within the life of the plan. Bighorn sheep herds in this location have been struggling for years trying to maintain a foothold, but recent CDOW figures for the past 4-5 years have shown a steady decline. The primary reason for this decline is believed to be the interaction of bighorn sheep with domestic sheep. Alternative C differs from the Preferred Alternative and the PRMP, however.
8. In Alternative D in the DRMP, (which the comment specifically references), no domestic livestock grazing would be authorized in most of the Dillon Pinnacles area and some of the area south and west of Lake City. Cattle only would be authorized in part of the area south and west of Lake City, within the Cebolla Creek area, and within the Cochetopa Creek area. Cattle or sheep would be authorized within the Lower Lake Fork Canyon area. Please refer to the prescriptions for Management Units D-2, 4, 5, 6, 8, 9, 10, 15, and 17 for more complete details on livestock grazing within bighorn sheep areas in Alternative D.
9. Monitoring studies proposed in bighorn ranges would include utilization by bighorn sheep and domestic livestock to evaluate the degree of completion, trend, use patterns, effects of land or vegetative treatments, and population levels.
10. The PRMP includes the recommendation to conduct monitoring studies in bighorn sheep ranges, as well as in pronghorn ranges.
11. Thank you for pointing the discrepancy out to us. A change has been made to table H-2, which is reprinted in the PRMP.
12. We recognize that domestic sheep grazing overlapping with bighorn sheep presents a disease threat to bighorn sheep. The concern is addressed on page 3-121, Management Unit E-10, in the DRMP.

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12

The threats attributed to domestic sheep in ACECS 9, 10, and 11 are no so much from grazing as from disease. Clarify that domestic sheep are a disease threat. Since this threat ~~seems~~ to be recognized (7), why is it not addressed in any of the management options?

Thank you for accepting comments on this management plan.

James A. Bailey
Professor of Wildlife Biology
Colorado State University
Fort Collins, CO 80523

STATE OF COLORADO
Roy Romer, Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
AN EQUAL OPPORTUNITY EMPLOYER
Perry D. Olson, Director
8050 Broadway
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47



June 6, 1991

Mr. Bill Bottomly
RMP Team Leader
Bureau of Land Management
2505 South Townsend Avenue
Montrose, CO 81401

Dear Bill:

The Division of Wildlife has reviewed the Draft Gunnison Resource Management Plan Environmental Impact Statement. We feel that BLM spent a considerable amount of time, thought and effort preparing this document and did a commendable job considering the many issues involving multiple use management. Whereas our Division is not recommending a specific alternative, we would like to offer the following comments on the document and offer some recommendations for actions we would like to see BLM initiate under the Resource Management Plan.

Each alternative has strong and weak points for wildlife habitat management, depending on which management unit is being discussed and which wildlife resource is being considered. Without the insight of preparing the document, it is difficult for the reader to compare alternatives because each one has different objectives for different management units. There are very few direct comparisons to determine which alternative might best benefit wildlife throughout the entire Resource Area.

Riparian enhancement and management is emphasized throughout the document. We feel this is one of the most significant measures BLM can address in future management plans. The Division supports a concept for managing all rangelands, riparian, riverine, wetland and upland areas in good to excellent condition. Enhancement of each of these areas will benefit wildlife and provide sound management of all public resources.

We support management emphasizing public outdoor recreation. We encourage the Gunnison Resource Area to reconsider the long-term thrust of management of public lands in this particular area. Available data indicate that commodity producers (120 grazing permits, etc.) within the Resource Area are at a low and decreasing level. Most growth is expected within the

DEPARTMENT OF NATURAL RESOURCES Kenneth Salazar, Executive Director
WILDLIFE COMMISSION, William R. Hegberg, Chairman • Eldon W. Cooper, Secretary • Felix Chavez, Member
Rebecca L. Frank, Member • Louis F. Swift, Member • George VanDerBerg, Member • Larry M. Wright, Member

Responses to letter 47

1. Columbian sharp-tailed grouse were not mentioned in the DRMP because the historical information we have is very limited regarding where this bird occurred on public lands. The PRMP includes language that would give BLM the option to consider and evaluate the introduction of sharp-tail grouse and Merrian's turkey.
2. The livestock grazing recommendations for the referenced vegetative type in the Preferred Alternative would be acceptable in a multiple use framework. Restrictions in some areas would be recommended. Please see the PRMP, units 1, 4, 5, and 15, for specific grazing recommendations.

The bighorn sheep herd in the area south and west of Lake City has had difficulty in maintaining stable numbers. Please refer to the response to comment 5 of letter 46.

3. Please refer to the response to comment 2 of letter 46, and most of the other responses to letter 46, regarding bighorn sheep.
4. The BLM plans to enhance the bighorn sheep range in the Cebolla Creek area. See page 3-121, DRMP, for general recommendations. A timber sale is planned to open up migration corridors, followed by a burning program. We will be working closely with CDOW during the development of this plan and future plans. There are no plans at this time to begin habitat enhancement projects for bighorn sheep along the lower Lake Fork. The STANDARD MANAGEMENT section, Chapter Four, PRMP, for bighorn sheep habitat management has been modified to allow for treatments if feasible and desirable.

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tourism sector of the economy. Whereas our Division wishes to work closely with the ranching community and BLM to improve range conditions and livestock management, we also feel a change in emphasis is needed to meet the changes in public needs and demands on public resources. Thus, the visionary approach would be to focus most efforts to enhance resources that attract recreationists, tourists, including wildlife viewing, landscape viewing, hunting, fishing, camping, nature interpretation, etc. Public recreation management should include provisions to protect wildlife habitats during important biological periods, such as nesting and birthing, brood rearing and nursing, and during the hard winter months. Sensitive winter ranges should be managed carefully to provide ample feed and cover while reducing human impacts on wildlife.

Proper enhancement and management of public ranges will help alleviate some of the conflicts currently going on between agriculture and wildlife by reducing big game damage to private landowners. The upcoming Habitat Partnership Program in the Gunnison Basin will no doubt address many of these problems and make recommendations on how we can collectively work together to resolve issues.

1 The E.J.S. does not mention Columbian sharp-tailed grouse, which historically occurred in the mountain shrub type in the western and northern portions of the Resource Area. This species was extirpated due to land use changes, over grazing, type conversion and conifer invasion. There is interest within the Division of Wildlife to re-introduce this species to the Gunnison area, provided suitable blocks of habitat can be managed for them. Some of these habitat blocks occur on BLM lands. We would appreciate this species being included in the final plan and look forward to working with BLM on possible re-introduction efforts.

2 Many of the alpine habitats above 11,000 feet in the Upper Lake Fork area, and especially near Engineer and Cinnamon Passes, have been degraded by domestic grazing and livestock management practices. As a result, productivity of these alpine sites is low and type conversion and habitat diversity has been reduced. We recommend alpine areas be re-evaluated for livestock grazing. Significant reductions or non-use should be considered. Unique wildlife species such as white-tailed ptarmigan and bighorn sheep would benefit. Enhanced riparian habitats dominated by willows at the higher elevations, particularly in the southern and western portions of the Resource Area would benefit ptarmigan. Pasteurella diseases in domestic sheep are known to transmit to bighorn sheep with significant die-offs occurring. The bighorn herd in the Upper Lake Fork Area is nearing extinction. The direct competition by domestic sheep on historic bighorn range is a serious issue which has been a problem for many years and needs to be addressed.

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4 We would like to see emphasis placed on the enhancement of bighorn sheep range in the Cebolla Creek and Lower Lake Fork herds. The Cebolla herd recently experienced a major die-off. There are excellent opportunities to improve range conditions in both these areas. The Upper Cebolla Creek range improvement could be done in conjunction with the management of the beetlekill timber problem in the canyon. Removal of infested timber stands by burning or logging and opening the areas up for sheep is highly desirable in the canyon. Other methods of range enhancement for the lower Lake Fork herd can be used. We would be happy to sit down with BLM and help develop a management plan for these areas.

The sage grouse/sagebrush relationship is well documented in the draft plan and high visibility is given to sage grouse. The productivity of the sagebrush communities in the Gunnison Basin has decreased significantly during the last 100 years due to heavy livestock and wildlife grazing, loss of topsoil, and changes in species composition and structure. Significant sagebrush eradication and manipulation has occurred as a result of spraying, burning and other eradication methods to increase livestock forage. This has resulted in major decreases in sage grouse abundance and distribution throughout the Gunnison Basin.

5 The sage grouse found in the Gunnison Basin are a unique genetic strain and differ from sage grouse throughout much of western North America in how they use sagebrush habitats. Distribution of this race of sage grouse probably extends into southern Utah. However, all other populations in southern Colorado and southern Utah are discontinuous, fragmented, and small. These isolated populations are being extirpated. Thus, the Gunnison Basin contains the largest remaining populations of this unique race of sage grouse. It is deserving of special recognition and management. Therefore the recommendations of the Western States Sage Grouse Technical Committee should be fully implemented. These recommendations are available from Clait Braun in our Ft. Collins office. The 1/4 mile or 1/2 mile restriction on activity/disturbance around identified active leks is inadequate. The restriction on activity/disturbance around identified active leks should be increased to a radius of 2 miles as recommended by the Western States Sage Grouse Technical Committee. These recommendations are based on data collected throughout the range of sage grouse.

6 Recent research efforts on sage grouse in the Gunnison Basin support previous findings. Sage grouse move freely throughout the sagebrush areas in the Gunnison Resource Area. All sagebrush areas should be managed and enhanced for sage grouse. Guidelines found in the Memorandum of Understanding between DOI, BLM and USFS for the Management of Sage Grouse within the Gunnison Basin should be followed with the protection of leks as outlined above included.

5. The guidelines on page A-2 of the DRMP, and in Appendix A in the PRMP, are good compromises between treating all sagebrush and minimal treatments. There are places in the Resource Area where the grass and forb understory is so poor that the only way to improve this condition is through vegetative treatments, and sometimes in combination with improved grazing systems.

In the judgement of BLM, the 1/4 miles buffer around active leks would be adequate to provide protection and to reduce impacts during the mating season throughout sage grouse areas.

6. The appendix on page A-2 of the DRMP contains the guidelines found in the Memorandum of Understanding for the management of sage grouse.

7. One of the objectives of riparian management in the Preferred Alternative of the DRMP is to improve the riparian/meadow areas that have been identified as important to sage grouse (please refer to Management Units E-11 and E-14). When feasible, in-channel structures or other projects to accelerate riparian area improvement would be used where the benefits would justify the costs. Water developments would be constructed as part of improving grazing management and could also be constructed as a part of sage grouse habitat enhancement.

8. Use on willows is minimal over the entire area; however in those areas where domestic sheep are concentrated, use can be heavy to severe. Since ptarmigan populations in the resource area are low, it's difficult to determine the effect that domestic sheep grazing has on the species. Much of the sheep use takes place above the tree line on forbs and grasses.

9. The Preferred Alternative recommends two right-of-way corridors, and proponents would be encouraged to locate future lines inside these. Some lines could be located outside of these corridors, however. In every case, the BLM would require necessary mitigation for impacts to wildlife in any authorization granted.

10. Please refer to the proposed OHV designations in the Preferred Alternative in the DRMP, especially Maps F-9, F-10, and F-11 in Appendix F. The OHV designations in the PRMP are identical to these.

11. Please see the response to comment 23 of letter 38.

12. See the response to comment 14 of letter 35.

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7 Enhancement and management of riparian habitats is highlighted in the plan. These habitats are important for a variety of wildlife and particularly birds, including sage grouse at lower elevations (<9000 ft), blue grouse at mid to high elevations (>8500 ft) and ptarmigan at high elevations (>9500 ft). The retention of 4-6 inches of stubble is appropriate in grazed areas as long as a variety of forbs is retained. Water developments should be further considered to restore water tables and historic wet meadows that have been altered/degraded by past livestock grazing management. More emphasis should be placed on water developments, especially within the sagebrush type. Timing of grazing should be controlled to reduce grazing of willows in riparian areas, especially at high elevations as buds of willow are the primary food of ptarmigan in winter. Ptarmigan frequently winter in willow-dominated sites far below treeline.

8
9 Powerlines are a demonstrated hazard to sage grouse (N.S. thesis by K. Ellis, Brigham Young University, Provo, Utah). Powerline development should be kept within the existing corridors. The proposed corridor to Lake City traverses sage grouse habitat south of Blue Mesa Reservoir.

10 Road management within the Resource Area should be closely defined and managed. Further emphasis should be placed on closing random roads and trails within the alpine and sagebrush types. Reclamation and revegetation, along with public education resource management, should occur as part of the plan.

There is considerable public interest in antelope management in the southeast portion of the Resource Area. We wish to continue to work closely with BLM in the management of these ranges and the continued improvement of these herds.

11 The Division is still interested in introducing moose in the Powderhorn/Lake City area. Whereas the document touches on this subject, we would like to see additional consideration for implementing the program.

12 As mentioned earlier, it is difficult to compare and understand alternatives and mapping. A map showing location of all grazing allotments in relation to proposed multi-purpose management plans would be helpful.

We applaud BLM's intent to acquire private lands in key winter ranges as outlined in the preferred alternative. We feel there is excellent potential to acquire critical winter and riparian areas adjacent to existing BLM lands.

Road management is a key tool in many sensitive areas. Development of an overall road management plan for the resource area is vital

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to the continuation of the wildlife resources in the basin. This is particularly true in the extra sensitive alpine zones and the transitional and critical wildlife winter ranges.

We encourage BLM to further delineate and enhance critical big game winter ranges. Protection similar to the winter closures in Lost Canyon and north of Blue Mesa Reservoir may be warranted in many additional areas as human winter activities continue to encroach on these critical ranges. We encourage BLM to emphasize this approach on BLM lands in the upcoming Gunnison Habitat Partnership Program.

Finally, we applaud BLM's overall attitude throughout the EIS to cooperate with our Division for managing federal lands for all wildlife species. Management for diversity is a key to maintaining healthy wildlife populations. The Division feels that continual development of this partnership attitude within the agencies will help us all do a better job in managing the public resources.

Thank you for the opportunity to review this document. We appreciate the efforts put forth by BLM on behalf of wildlife habitat and natural resources. We look forward to working with BLM to implement many of the goals outlined. Please feel free to call me concerning any questions you have on these comments.

Sincerely,


Rick Sherman
Wildlife Biologist

cc: Clark
Young
Braun
Capodice

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES



Rangeland Consulting 48

2413 Sheffield Circle West
Fort Collins, Colorado 80526

(303) 484-0041

June 7, 1991

Bill Bottomly
RPM Team Leader, BLM
2505 South Townsend Ave.
Montrose, CO 81401

Dear Bill:

Enclosed are my comments on the Gunnison Resource Area, Resource Management Plan, and Environmental Impact Statement.

I feel this document still needs a considerable amount of refining. I have written many referred Journal articles, a considerable number of reports and business related documents. Because I don't have any extensive contracts to work on now, I would be more than happy to make my services available to the BLM to help polish this document. Please contact me if there is any interest in pursuing this possibility.

I also am enclosing my copy of the document to make it easier to follow my comments concerning the manuscript too numerous to discuss individually.

If possible, I would appreciate the return of the enclosed manuscript since it is the only record of my suggested changes. Thanks for the opportunity to review the manuscript. Good Luck.

Sincerely,

Robert Hyde PhD

Responses to letter 48

1. Actual big game herd numbers on private land cannot be extrapolated from the tables in Appendix A of the DRMP, as the tables are projections or goals, and may or may not reflect actual numbers of big game in a Game Management Unit (GMU) at any given time, either on private or public land.
2. Please refer to the response to comments 11, 15, 16, and 20 of letter 38, regarding carrying capacities, big game utilization, and the relationship between CDOW and BLM regarding requests for reductions in big game population numbers. Also, please refer to the response to comment 13 of letter 50 for information regarding the manner in which elk population estimates are calculated during the year. Since 1983 the CDOW has been trying to hold elk numbers down to their long range herd goal of 9,000. Please also refer to the Wildlife Management section of STANDARD MANAGEMENT in Chapter Four of this PRMP, for information on big game utilization of habitat.
3. Disposal of public lands is a viable management tool in some cases, and tracts or areas for disposal must be identified in land use plans. Strict, established criteria in the Federal Land Policy and Management Act (FLPMA) would have to be met, however, in each instance. Acquisition of privately owned lands is a viable management tool that is sometimes used to enhance management of a particular resource or area; this tool is not restricted to recreational purposes, however.
4. The Preferred Alternative in the DRMP, and the PRMP, is a combination of actions and recommendations from all the alternatives considered.

General Comments

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Riparian areas are partially misunderstood and are not being managed to their ecological potential. Better developed soils and increased moisture availability result in increased and more diversified biological activity causes these areas to be much more productive and more difficult to manage than nearby uplands. Large herbivores are biologically attracted to riparian areas because the area has greater quantities of a more diverse vegetation available for consumption and usually have available water. Riparian areas can change ecologically more rapidly than uplands, primarily because of their greater production potential. One might think that no herbivore use might be best on riparian areas, or lets keep cattle off so the forage can be saved for wintering deer and elk. Neither case will result in the riparian area that most people visualize. Riparian areas developed ecologically, through time, with herbivore grazing and must be grazed and browsed to maintain themselves. Imagine, for a minute, a bluegrass lawn that is properly watered and fertilized, but never mowed. What will happen? Growth will be tremendous for a short time, then because so much growth is not harvested (mowed) the lawn will literally kill itself or choke itself out. In a short time it looks unkempt, herbage production is only 1/10 what it once was and if the home owner is sufficiently lazy, he is happy with his management plan that requires him not to mow.

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This example is extreme, but it can happen on native vegetation over time IF IT ISN'T PROPERLY USED.

If riparian areas or uplands are either overused or underused, the result is very similar, simply because all grassland types evolved through time being grazed by both large and small herbivores. Both riparian and upland types must be properly utilized in order for them to maintain themselves.

Deer and elk increasing numbers bother me, and I love to hunt elk. Its common knowledge that there is a carrying capacity for elk and deer. Your reference to "crucial elk and deer winter range" makes me believe that elk numbers are at or slightly above their winter carrying capacity. I scratched "crucial" in your report because its redundant. All winter range for elk is crucial. Not only is food limited, but snow cover and temperature are typically extreme. People say that wildlife are well adapted to survive winter, and they are. I think its most remarkable that any elk or deer can survive the critical winter extremes of low temperature, limited food supplies, high snow amounts and increased body energy demands especially for pregnant cow elk, but they do. They increase in numbers as long as there is adequate winter food, temperatures and snowfall aren't extreme. We have had relatively mild winters the past several winters, but when a really severe winter comes sometime in the next few winters there will be a rather extreme die off. Why? Because wildlife numbers exceeded the true carrying capacity of the land.

People want wildlife. They like to casually observe them

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and thats all good up to a point; that point being the carrying capacity of the land. Nature may be extreme, and is known to be cruel, but effective. The worse the winter, and the more carrying capacity is exceeded the worse the consequences, or winter kill. It will happen; it's just a matter of when.

Winter feeding can alleviate this winter kill, but I am strongly opposed to it as a solution. Its expensive, its unnatural and basically it just prolongs the real problem, too many wildlife for the land to support during critical winters.

I note some interesting numbers in the Gunnison Basin RMP and EIS. I note first Table 2-16 Colorado Division of Wildlife Herd Goals on page 2-23 that lists elk and deer herd numbers as of 1989 Post Hunt as follows:

DEER			
DAU	GMU	DEER OBJECTIVE	DEER NUMBERS POST HUNT 1989
21	54	4800	5360
22	55 & 551	5000	5760
25	66 & 67	6800	5390
TOTALS		16600	16510

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

ELK

DAU	GMU	ELK	
		OBJECTIVE	POST HUNT 1989
41	54	3000	3490
43	55 & 551	3000	3660
25	66 & 67	3000	2990
TOTALS		9000	10140

1 I later noted Appendix A on page A-1, Tables A-1, A-2 and A-3. Why wasn't Table A-4 "Actual Herd Numbers on Private Land" included? Based on BLM and CDOW numbers it is fabricated below:

Table A-4 Actual Herd Numbers on Deeded Land			Table A-2 Long Range Herd Goals on Public Land		
GMU	ELK	DEER	GMU	ELK	DEER
54	2240	3360	54	1250	2000
55 & 551	2160	760	55 & 551	1500	5000
66 & 67	1890	4390	66	1100	1000
Total	6290	8510	Total	3850	8000

It's really difficult to follow either BLM or CDOW's reasoning regarding deer and elk numbers, and I wonder if any of the big game biologists or land managers are aware of the actual 1989 big game numbers compared to the long range and interim herd

goals. For instance the interim herd goals for deer and elk (Table A-3) were stated as 8,000 elk and 1,100 deer. Reportedly these were the herd numbers recommended to CDOW to be in effect until after shrub production and vigor increases. This all sounds well and good except the CDOW reported numbers actually on the Public and Deeded land were 10,140 elk and 16,510 deer.

It appeared to me that winter game use had been somewhat heavy on the first few riparian areas we looked at on 4/29/91. I didn't say so as such, but did ask questions and asked how BLM would react if CDOW had (hypothetically) 20,000 elk as their goal. I was told that BLM would recommend to CDOW that this number was too high and that they should consider reducing their goal to a more reasonable number.

2 I think 9,000 head of elk is at or slightly beyond the long term elk carrying capacity for the Gunnison Basin and that CDOW should, in fact, be asked to reduce the reported 10,140 head to no more than 9,000 head of elk if these big game numbers are correct.

Perhaps, if Table A-3 is correct, CDOW should be asked to reduce elk numbers to 8,000 and deer numbers to 11,000 head. This would mean reducing deer numbers by 5,510 head and elk numbers by 1,340 head.

I seriously doubt that BLM will ever be satisfied with the condition of riparian areas as long as these big game numbers are allowed to exist or perhaps even increase more.

Considering that a reported 6,290 head of elk and 8,510 head

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

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of deer are being carried yearlong now on deeded land, this proposed big game reduction should be welcome by private landowners. CDDW might also appreciate this being pointed out to them because it should drastically reduce Game Damage Claims to CDDW by private landowners who suffer game damage.

3 | Buying deeded lands or selling BLM lands should be an available alternative, but should be rarely used. Proposed land purchases too frequently seem to be justified on the basis of probable improved or increased recreation potential. Recreational opportunities are increasing rapidly for the American people, but I question that government agencies should become involved in non cost effective recreational endeavors.

Anti-agricultural people are saying "livestock free by 93". That's a catchy phrase, but heaven forbid if it ever really catches on. Today's small farmers and ranchers are having a tough time economically. Lets try to give them a break when we can, partly in appreciation for the good job they have done the past 200 years and partly because most of us want a grazed or used environment that remains healthy rather than a nongrazed one that can't maintain itself and over time deteriorates to a weed patch or bare ground. Livestock free by 93: NO WAY!

I am convinced it is a mistake to manage our lands and not harvest our renewable resources near the optimum level in order to realize a reasonable level of returns. Concerning our renewable resources it can be truthfully said USE IT OR LOOSE IT. The whole management key is to properly determine the maximum annual

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harvest on a sustained yield basis and then to obtain that harvest on an annual basis. This is proper management.

Specific Comments

4 | I don't think that respondents should be limited to selecting from alternative A to E. What if there are parts of several Alternatives that are preferred? I question the advisability of designating Alternative E as the Preferred Alternative. This implies that the other Alternatives are a waste of time because our minds are made up and Alternative E is it.

I am totally opposed to Alternatives B and D. Many recreationists don't really know what they are looking at, don't know how to get from point A to B without harming the environment and expect whatever they need to be readily available. Many recreationists would be very happy if there were a gas service station and a quick food establishment located at least each 10 miles. Alternative B would be about the quickest way I can imagine to ruin the Gunnison Basin.

There appears to be many advantages and very few disadvantages to Alternative C. The primary disadvantage of this alternative is that it would require more employees field time than the other alternatives. Perhaps more BLM employees would be required in the Gunnison office, but hopefully increased income from added natural resources sales would help pay the added

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

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employee costs. Basically, I prefer Alternative C.

If we are looking at 548,293 acres grazed at 47,438 animal unit months grazing, this is not overgrazing, but says that roughly 12 acres are being allowed for each animal unit month or 60 acres per dry cow for a five month grazing season. Three cows per quarter section of land is not overgrazing.

There are too many "weasel" words. "Generally" is much overused. Too much time, energy and verbable is spent protecting yourselves from every conceivable situation. Much more effort should be spent to make the document as brief as possible, concise and to the point.

I would hate to try to manage 100,000 acres of natural grassland/shrub type and not have the use of livestock as a tool to help maintain or improve the ecological condition of that land and to get some reasonable economic return from same. As far as I am concerned every acre of public owned land should be managed to return the maximum economic net return per acre, over the long term, without degrading the ecological status or condition. I hope the time will soon come when every land manager in the nation will try to manage land on this basis, and that our laws, rules, regulations and the EPA will allow them to do so.

I think pseudo environmentalist should give thanks for the reasonable priced steak or hamburger on their plates, rather than bitch about the cow pies on the picnic grounds.

Responses to letter 49

1. through 4. See the responses to comments 4 of letter 12, 2 and 1 of letter 8, and 1 of letter 11, respectively.

Davin Green
Wilderness Study Group
Campus Box 207
Boulder, CO 80309

49

Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 South Townsend Ave.
Montrose CO 81461

Dear Mr. Bottomly,

Thank you for including my comments on the draft Resource Management Plan in your efforts to address corrections of oversights or deficiencies in the draft. I am writing you on behalf of the University of Colorado's Wilderness Study Group, an environmentally oriented organization involved in research on Colorado public lands.

Traditionally, the BLM has not had to cope with the high level of recreation activities on the lands that it manages as other agencies have. But the Gunnison Resource Area needs to manage its lands with more emphasis on recreational and ecological values because of the special places found there. The lands there are generally more valuable to the public as recreational and ecological preserves, and to keep them safe from threats requires positive action in this RMP.

As the trend towards recreation has increased in recent years and will probably continue to do so, so has public concern for ecological values increased along with the need to manage the recreation. As I can easily tell for myself writing you from Crested Butte today, mountain biking is definitely on the list of very popular summer recreation options which impact BLM lands, along with hiking, and the popular fishing and boating activities of summer. All of these activities share some common characteristics: they depend on various ecological and wildlife values being protected from damage, rely on preservation of the area's remarkable scenic beauty, and require BLM management. Although your current draft does include Areas of Critical Environmental Concern for some of the most important resources, I do not feel that the current draft

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

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plan is up to the level of protection the region's resources need because there are other resources which should be added as ACECs, and are not in the draft.

1 For a beginning, building more foot trails in all appropriate areas should help to relieve pressure on otherwise too heavily used areas: the more the mileage of trails, the more dispersed the impacts of trail recreation on the lands.

2 Additionally, the riparian areas east of Gunnison need protection not for recreation opportunities, but because winter deer and elk herds need a break from heavy cattle grazing competition, that has also hurt the riparian areas. They should be managed as an ACEC, with emphasis on protecting the winter range for the animals (which is very difficult to find given the natural and historical human development of the lower elevation, stream bottom areas.) Having the extra winter range area is complimentary to the draft's winter range ACEC near Blue Mesa.

2 The Cebolla Creek area, because of the presence of bighorn sheep there, should be managed as an ACEC, like the East Gunnison area, to protect the herd's welfare. The entire Alpine Triangle should be covered as an ACEC, preserved for its wildlife and also for the many visitors who enjoy the alpine region. It is rare that the BLM in any part of the nation should manage such a high elevation area, which is probably the most beautiful recreational area the BLM oversees anywhere. I know that the Slungullion Slide is valued as a "textbook example" of geological process because I have studied it in geography classes. Designating the entire area as an ACEC would surely simplify management of the individual resources like the Slide, and would dovetail nicely with the Wild and Scenic Corridor of the Lake Fork Gunnison should the agency recommendation be changed in the draft.

3 In order to preserve it from damming and more development, both for the wildlife and the recreationists, the Lake Fork River should be recommended to Congress for Wild and Scenic designation. By its mere presence in the Alpine Triangle, I feel that it easily meets the requirement for at least one outstandingly remarkable characteristic, with several.

4 In general, the direction that I hope the Gunnison Resource Areas takes in this RMP is away from the BLM's "traditional" role as an administrator for mining and grazing developments. I feel, and I think that many of the public feel, that protection of ecological and recreational values should be elevated over past levels. I do not feel that this precludes responsible maintenance and limited expansion of mining and/or grazing activities. To be socially and morally responsible, such activities must be

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environmentally responsible also, and thus I do not feel that expanded and stronger environmental protections in the Gunnison Resource Area stand in the way of legitimate interests.

Davin J. Green
Davin Green,
Wilderness Study Group

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

GUNNISON COUNTY STOCKGROWERS ASSN.
INCORPORATED

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RE: COMMENTS ON GUNNISON RESOURCE AREA DRAFT RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT (DRMP/DEIS).

Gentlemen:

The Gunnison County Stockgrower's Association (hereafter "GCSA") hereby submits its written comments on the DRMP/DEIS for the Gunnison Resource Area. As you are aware, the GCSA was founded in 1894 and for nearly a century has been an active representative of the livestock industry in the Gunnison watershed. GCSA, by and through its membership, represents private individuals, families, partnerships, corporations and other entities which own or use lands, water rights, livestock, grazing permits and leases in the area covered by the plan. As presently proposed, the Resource Management Plan or portions of it may deny or alter certain of these members the use of these various properties. As such, the GCSA represents

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a membership that is or may be affected by approval of the proposed Resource Management Plan. Should it become necessary, GCSA has standing to protest approval of this RMP under 43 CFR 1610.5-2 (1990).

These comments were prepared after extensive review of the DRMP/DEIS by a select committee within the GCSA, which comments were then reviewed by the Board of Directors of the GCSA prior to submission to the BLM. The BLM Area Manager made available a number of additional detailed supporting materials through the cooperation of the RMP Team Leader. Their assistance in that regard is appreciated.

I. PLANNING ISSUE TWO AND THREE - FORAGE CONDITION/RANGE IMPROVEMENTS

The Stockgrowers are very concerned about the "Planning Issues" that were developed and are apparently driving the scope of the DRMP. Those "Planning Issues and Criteria" listed on pg. 1-6 in Table 1-2 seem to focus a great deal of the RMP on forage-related issues. Specifically, Issue 2 states:

"2. What management should occur to maintain or improve forage conditions in allotments not covered by current Allotment Management Plans (AMPs) or by outdated management plans?"

As background, this planning issue needs to be analyzed against Section 402 of the Federal Land Policy and Management Act of 1976, 43 U.S.C. 1751(c) & (d), and the decisions of the federal courts in *Kelly Inc. v. Morton*, 388 F. Supp 829 (D.C. 1975), *448 F. Supp. 802 (D.D.C. 1978)*. The issue was twofold: 1) the requirement for the development of specific basin Grazing EISs and, 2) the statutory requirements that the BLM have in place, in current and constantly updated AMPs or through current terms and conditions in permits and leases; provisions which would protect the range resource.

The Gunnison Basin Grazing EIS was completed in 1980. For the record, GCSA and the local livestock industry are very desirous of having each local allotment under the jurisdiction of the BLM operating under AMPs that are current and properly developed in full compliance with Section 8 of the Public Rangelands Improvement Act of 1978 (P.L. 95-514; 92 Stat 1803). The recent MOU on Section 8 executed by the CCA, CWGA, the State Director and the Colorado Commissioner of Agriculture stands as a tool to assist in that process.

GCSA is very conscious of the current political and social environment in which public land grazers operate in the west. Our association is making a sincere effort to put our industry's best foot forward, particularly at the local level. As a consequence, we are very supportive of a BLM range livestock program that provides for adequate funding of a strong, on-going, AMP driven program of rangeland improvement projects within each allotment and throughout the BLM Resource Area.

Responses to letter 50

1. The issues the DRMP and PRMP address were arrived at during the early scoping process (see page 1-5 of the DRMP). Newsletters, news releases, and open houses were utilized in soliciting public input on the issues, which were initially drawn up by the planning team. Issues 1,2, and 3 directly focus on how to manage vegetation in the Planning Area. Issue 4 indirectly addresses vegetation, as pointed out in the response to comment 40 of letter 38.
2. Please refer to the response to comment 9 of letter 35, and to page 3-3 of the DRMP for discussions of budget needs to implement the referenced actions. The increase mentioned on page 3-3 of the DRMP would apply to the PRMP as well. Regarding the comment on Allotment Management Plans, please also refer to the discussion under the italicized subheading, "*Activity Plans and Grazing Agreements*", under Livestock Grazing Management in the STANDARD MANAGEMENT section of Chapter Four in the PRMP.
3. Please refer to the entire discussion of Livestock Grazing Management in the STANDARD MANAGEMENT section of Chapter Four, in the PRMP, for information regarding the updating, evaluating, and modification of Allotment Management Plans (AMPs).
4. The implementation plan for the approved RMP will be prepared shortly after the State Director signs the Record of Decision that will be published with the RMP. Schedules or target dates for implementing decisions in the RMP, including writing AMPs, will be contained in the subject implementation plan.
5. Please refer to page 2-5, Chapter Two, of this PRMP for a discussion of the relationship of this PRMP and the April, 1980, Draft and the September, 1980, Final Gunnison Basin Livestock Grazing Environmental Impact Statement.
6. Please refer to the discussion in Chapter Two of the PRMP mentioned in the response immediately above, regarding implementation of range treatments and projects, and the discussion in the italicized subheading "*Range Improvements*", page 4-10, in Chapter Four of the PRMP.
7. The livestock grazing management section of the prescription for Management Unit E-11 (containing sage grouse high production areas) in the DRMP has been modified in the PRMP, and clarifies the application of guidelines in Appendix A for sage grouse management relative to range treatments. In unit 11 range treatments and projects that meet sage grouse habitat management objectives and that are designed to improve livestock forage, would be permitted and encouraged. If range treatments or projects result in increased forage, once watershed objectives are met the excess forage would be allocated for livestock according to 43CFR 4100. The necessity to modify or revisit existing activity plans, MOUs, and other in-place management documents could also arise. Refer to Appendix A for reorganized and reworded sage grouse habitat management guidelines. Also, please refer to page 2-5, Chapter Two, of this PRMP for a discussion of the relationship of this PRMP and the April, 1980, Draft and the September, 1980, Final Gunnison Basin Livestock Grazing Environmental Impact Statement.
8. Please refer to the responses to comments 3, 4, 5, and 6 of this letter.
9. Please see the response to the similar comment 49 of letter 38. The BLM believes that the issues as stated in the DRMP, and the comprehensive nature of the Draft and Proposed RMPs, as dictated by the Supplemental Program Guidance (BLM Manual 1620), adequately address the importance of the livestock industry to the local economy within the planning area.

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2 Regretably, despite this express statutory direction from Congress and despite the best intentions from both the BLM and the industry, according to the DRMP, (pg. 2-28) only 28 of the 146 grazing allotments in the basin have an AMP. Other information indicates substantially less than the 28 allotments reported in the DRMP actually have a current AMP. The inference from the "Planning Issue" listed above is that either: 1) forage conditions are not improving or being maintained because allotments are not covered by existing or current AMPs; or 2) the livestock operators are somehow at fault for the absence of current AMPs and the resulting decline in forage condition. It is not even clear from the DRMP which AMPs may be regarded as current, but after approval of this proposed PRMP, all AMPs would technically be outdated in some fashion or another.

3 This is a situation which needs to be addressed. Unfortunately, the DRMP is woefully inadequate on this issue, stating only that:

3 "...changes and possible adjustments could remain in effect until conditions are improved or until new or revised AMPs or CRMAPs are developed and implemented. Existing AMPs would be revised and new AMPs or CRMAPs would be developed at the rate of about 1-2 [1]AMPs/revision per year." DRMP pg. 3-105, (emphasis added).

4 Very simply, by failing to keep the AMPs current and implemented, range improvement progress is slowed and permittees are being denied the opportunity to have their "activity plan" for grazing, their AMP, developed fully within the protections afforded them by Section 8 of PRIA and the mechanism set up by the MOU mentioned above. Under the express language of the DRMP, changes in current management on most allotments could remain in effect indefinitely, as only 20 AMPs at a maximum would be revised or developed in a decade! The DRMP says little, if anything about a schedule for implementation of those AMPs.

The DRMP states unequivocally that "all grazing allotments have use (AUMs) licensed in accordance with the decisions issued from the Gunnison Basin Livestock Grazing Environmental Impact Statement (issued June 1981)." The 1980 Gunnison Basin Grazing EIS was developed after a full opportunity for public participation in compliance with the National Environmental Policy Act as a consequence of the NRDC lawsuits cited above. Commitments were made by the BLM to the livestock industry, environmental interests, and the general public about planned activities and programs related to the range resource in the Gunnison basin.

The 1980 Gunnison Basin Livestock Grazing EIS MFP/Spring Rest (which along with a complementary Fall Rest Schedule was the adopted preferred alternative) authorized basin wide 44,542 AUMs for livestock and 34,200 AUMs for wildlife. Potentially allocatable AUMs for the long term (2005) were to be 91,207 AUMs for both livestock and wildlife by management only and 111,728 AUMs by implementing management and vegetation treatments. Obviously, there would be significant economic benefit to the local community as a result of an increase of total AUMs from 78,742 to 111,728.

5 Range improvements, a major, itemized component of the approved alternatives in the 1980 Grazing EIS for full implementation over eight years were as follows:

- 1) 97,090 acres for vegetative treatments as follows:
 - 14,500 acres by aerial spraying with 2,4,-D
 - 68,000 acres by prescribed burning
 - 14,500 acres by mechanical treatment
- 2) facilities to be constructed included:
 - 197 miles of new fence.
 - 215 new cattle guards
 - 59 new stockwater reservoirs
 - 63 new vertical or horizontal wells
 - 181 new springs
 - 39 miles of water pipelines
 - assorted stock tanks, and trail improvements

In terms of stocking levels, the DRMP indicates that only in 1980, the first year the Grazing EIS was implemented, did the AUMs actually used by the local livestock industry basinwide exceed the EIS authorization (45,034 AUMs) and in all subsequent years has been substantially below both the available AUMs (active preference) actually authorized by the BLM staff and the EIS authorization. See, DRMP, Appendix Table B-2,.

6 Despite a very thorough review of the DRMP, we could find no evidence there or in the supporting materials subsequently provided that indicated that those range improvements contemplated by the 1980 Grazing EIS have been fully or partially accomplished. Nor were any specifics set forth about what range improvement projects or activities were contemplated in the future over the life of the RMP. This is a major defect in the DRMP that must be corrected.

What we did find was very troubling for it speaks volumes about the scope, direction, and focus behind the above "Planning Issue". From the perspective of the livestock industry, it is clear that key portions of the 1980 Grazing EIS as to range improvements have not been compiled with and the DRMP is fatally and legally incomplete in addressing that issue. In that regard, specific attention of the Area and District staff reviewing these comments is called to the Management Situation Analysis Resource Area Profile for Livestock Management prepared by Bud Cribley on January 16, 1989. Mr. Cribley reported:

"The Rangeland Program Summary (RPS) for the Gunnison Basin Grazing EIS specified management that would occur to resolve identified problems. Management goals were to develop 69 new AMPs, revise 28 existing AMPs, and to develop range improvements (fences, waters, vegetation treatments, etc.) on certain allotments to implement management. Estimated cost for the proposed range improvements was 3.5 million 1981 dollars. To date we have only 3 AMPs and are currently receiving approximately \$15,000 to \$20,000 dollars/year in range improvement funds. The RPS set a time frame of 8 years to prepare AMPs and implement management on all allotments

The BLM acknowledges that livestock grazing is an important component in the overall management scenario on public lands and provides important contributions to the social and economic fabric in the Planning Area. The continuation of this industry is important to ranchers and BLM livestock permittees, BLM, the general public, and the local economy. We believe that it is important to both livestock operators and BLM to have a healthy range with improved forage conditions, vigor, and distribution. These are some of the goals and objectives of this PRMP.

The goals in the referenced resolution and the language in BLM's Issue 4 do appear to be consistent. Please also see the opening paragraph in letter 81 from The Gunnison County Board of County Commissioners, in which the issues are mentioned.

10. Please refer to numbered item 4 on page 4-8, and to the last paragraph in the left-hand column on page 4-9 in the PRMP for language regarding adjustments in grazing preference.
11. Big game herd goals for BLM-managed lands, for both the interim and the long term, are presented in the DRMP (see Appendix A, page A-1) and in the PRMP, in expanded tables in Appendix A. These goals relate to the carrying capacity of the habitat in the interim and for the long term. Please refer to the response to comments 11, 15, 16, and 20 of letter 38, regarding habitat carrying capacities and the relationship between CDOW and BLM regarding requests for reductions in population numbers. Please also refer to the reworded Wildlife Habitat Management section of STANDARD MANAGEMENT, in Chapter Four of the PRMP for language regarding carrying capacities.

Recommendations were made in the DRMP to hold big game populations within habitat carrying capacity on public lands (please see Table A-3, page A-1, in the DRMP). As a result of our monitoring studies, our primary concerns are with the long range herd goals for deer. In Table A-3, page A-1, in the DRMP, BLM recommends lower interim herd goals for deer until shrub production and vigor increases.

12. In 1983, this resource area initiated an intensive monitoring effort to evaluate decisions that were made at the completion of the 1980 Management Framework Plan and the Grazing Environmental Impact Statement. In 1985, this monitoring effort was further refined. The BLM used aerial observations, CDOW information, 1980 wildlife AUM figures, and 9 years of monitoring results. As a result, over 20 individual files which represent segments of the winter range were established to intensively monitor elk and deer use in these areas. These files contain information about utilization, trend, form class, and distribution for uplands and riparian vegetation communities. Including the data would have greatly increased the size of the referenced documents, and would have served little purpose. These files are available for review in the Gunnison Resource Area office.

This information was used as the basis to recommend elk and deer carrying capacities on public lands (please see Tables in Appendix A of the DRMP, or Tables in Appendix A in the PRMP). The BLM has a concern at this time regarding whether winter ranges on public lands can support that portion of CDOW's long range herd goals for deer without further impacting habitat conditions on winter ranges. Although utilization on winter areas has been within proper levels for the most part, there are areas where we have concerns about the condition and quality of some of these shrub stands, such as in the Cimmaron area, the canyon along Cebolla Creek, and areas along Cochetopa Canyon. This condition appears to have occurred sometime in the past, perhaps during the sixties when deer populations were extremely high. For these reasons, BLM would prefer to see deer numbers on public lands lowered by about 30% in the interim in several areas, in order to allow habitat conditions and vigor to be improved. By following interim herd goal recommendations in table A-3 in the DRMP, and in Table A-4 in the

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scheduled for intensive management. Obviously those management goals have not been achieved. The primary reason is, and has been, a lack of manpower to provide all the functions of the grazing administration program plus development of new AMPs, and the lack of range improvement funds to implement the types of management described in the RPS. . . . Our implementation period has changed from 8 years (which has already elapsed) to approximately 50-75 years, based on past and current capabilities within the PA." MSA/RAF of January 16, 1989, pg. 5.

Mr. Cribley then outlined his views on the general conditions of the range resource in the Resource Area. As regards range improvements he reported:

"One of the range improvement options that was identified in the Gunnison Basin Grazing EIS was vegetative treatments. There were over 97,000 acres of sagebrush rangelands that were identified for treatment. This represents over 30% of the rangeland suitable for grazing in the PA."

"As we have started to conduct treatments, concerns are being expressed as to what the impacts of this such treatment will have on wildlife habitat. . . . Some of the most important wildlife habitat exists on sites that have the best potential for vegetative treatments."

He concluded: "It is important that vegetative treatments remain a viable management option for managing livestock grazing and not be restricted to the point that those treatments not be beneficial to overall resource management." MSA/RAF, pg. 7.

His comments are especially important given that Congress has previously in FLPMA announced and declared:

"The Congress declares that it is the policy of the United States that:

(12) the public land be managed in a manner which recognizes the Nations need for domestic sources of minerals, food, timber and fiber from the public lands." 43 U.S.C. 1701 (12).

In furtherance of that policy, Congress has further found and required:

"Congress finds that a substantial amount of the Federal range lands is deteriorating in quality, and that installation of additional range improvements could arrest such of the continuing deterioration and could lead to substantial betterment of forage conditions with resulting benefits to wildlife, watershed protection, and livestock production. . . . Such rehabilitation, protection, and improvements shall include all forms of range land betterment including, but not limited to, seeding and reseeding, fence construction, weed control, water development and fish and wildlife habitat enhancement." 43 U.S.C. 1751 (b)(1)(emphasis added).

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In the face of this clear Congressional policy and direction encouraging range improvements and the express goals and targets of the Gunnison Basin ~~court-ordered~~ Grazing EIS, other new constraints are being placed on further vegetative treatments even prior to adoption of the DRMP. The MOU on The Gunnison Basin Sage Grouse Habitat Management Guidelines between the BLM, Forest Service, and the CDOW provides guidelines that restrict or discourage land treatments on potentially vast acreages of land within the Planning Area. This document acts as a limitation upon and is in direct conflict with portions of the range improvement program of the Gunnison Basin Grazing EIS. Moreover, the DRMP Preferred Alternative states that "identified sage grouse brood-rearing habitat and nesting areas, and winter habitat would be maintained or improved. Sagebrush and riparian vegetation would be managed to achieve a harvest goal of 1,000 grouse annually." To the extent this contemplates limiting previously scheduled vegetative treatments, this management proposal is in conflict with the Grazing EIS and potentially violates 43 U.S.C. 1751(b)(1).

In the Standard Management proposed for both "Vegetation" (p. 3-103) and "Livestock Grazing Management" (p. 3-105) under the Preferred Alternative, the DRMP sets a very high standard of management for the livestock industry. Strategies for livestock grazing management "could include and require changes in turn-out dates, season of use, duration and frequency of grazing use and would be accomplished with grazing system prescriptions which involve deferment, rest or rotation. New livestock facilities and land treatments would be developed if needed to achieve AMP or CRMAP or other objectives."

In summary then, our review of the DRMP and the supporting information indicates:

- 1) Basin-wide, livestock grazing levels are currently below both the levels required by the RPS Gunnison Basin EIS and the Active Authorized Use.
- 2) AMPs have not been developed on schedule by the BLM and in fact, are significantly behind schedule.
- 3) The total program of range improvement contemplated by the Grazing EIS, a significant and major element of that document, has not been implemented to the detriment of the range resource, wildlife habitat, and the local livestock industry.
- 4) Additional actions have been taken in the name of other resources (e.g. the sage grouse MOU) that potentially have aggravated the problem.
- 5) The RMP intends a major change in the policy and approach for range improvement specifically and livestock management generally and has failed to even superficially address the above issues.

These are major issues that the RMP must develop in such greater detail and deal with, resolving the issues and providing guidance for

PRMP, the habitat quality of these areas would be expected to increase, and with the addition of some projects it is anticipated that the habitat carrying capacity would eventually support CDOW long range herd goals, and at the same time sustain the improved habitat conditions. The numbers of animals in Table A-3 in the DRMP represent those that would, in the recommended interim, be expected to occur throughout the entire Planning Area. Please see the Appendix A in the PRMP for expanded tables.

13. The following information is provided to display how elk numbers are estimated for lands in the Planning Area in GMUs 54, 55, 66, 67, 551, and small parts of 64 and 65. The information is based on data from the CDOW. Yearly populations are based on a biological year which starts in the spring after calving and ends before new calves are born the next calving season. In table 2-16, on page 2-23 of the DRMP, the numbers present are post-hunt figures only and do not include winter mortality. If winter mortality is included, the number of animals going into the biological year would be less. The number of elk at the end of the biological year are the population figures that are used by CDOW and others to determine yearly population numbers.

Using the data from CDOW, estimates for elk populations for the Planning Area during the biological year for 1990 appears below.

1990 BIOLOGICAL YEAR - ELK			
1 Post-Calving Season Numbers	2 Pre- Harvest	3 Post- Harvest	4 Pre-Calving Season Numbers
15,857	15,314	10,167	9,128

Column 1 includes the estimated number of elk surviving through the winter plus new calves born that year.

Column 2 is the estimate of the numbers of elk that live until the beginning of hunting season(s).

Column 3 represents post-hunt estimates.

Column 4 is the estimated number of elk that survived the winter, and before new calves are born. The number in this column represents the estimate of the population of elk for management purposes by BLM.

Providing post-hunt figures in the DRMP for the period indicated in the comment would not add significantly to the analysis conducted in the document. The figures are available from the CDOW or BLM on request. Significant environmental consequences anticipated from wildlife habitat management in each alternative are addressed in Chapter Four of the DRMP.

14. Please see the responses to comment 12 and 13 of this letter. A rewrite of the wildlife habitat management component of the Resource Area Profile portion of the Management Situation Analysis is not warranted at this time, as the amount of new information pertinent to the resource would not be substantial. The BLM's Supplemental Program Guidance was followed in the preparation of the wildlife habitat capacities that have been determined. Other authorized uses were also considered to the extent necessary in the determination of all resource information in the DRMP and MSA.

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the public and the resource users. A Resource Management Plan is required to establish in a written form the allowable resource uses and specifically: "the general management practices needed to achieve the above items;" 43 CFR 1601.0-5(h) (2) & (4) (1990). That language would certainly include the vegetative treatments and range improvement program. What the DRMP contemplates is a major reversal of a prior policy promoting range improvement and vegetative treatments. The proposed level of range improvements under the RMP is simply not stated in any detail. A complete rationale for the subtle but major change in policy is not provided. At no point is the failure of the BLM to develop AMPs in a more timely fashion, (more than 1 to 2 a year, let alone that contemplated in the grazing EIS) addressed by the RMP. What levels of sagebrush treatment are going to be sustained and implemented on a basinwide basis under the RMP? What levels of manpower and funding are available for these efforts? What is the proposed implementation schedule? What will be the effect presently and over the long term of non-compliance with the Grazing EIS?

The DRMP paints a distorted picture of declining range conditions and the need for further management conditions to be placed on the livestock industry locally yet ignores the serious and continuing decline in range treatment efforts. The consequences of the inadequacies of the DRMP on this issue are seriously detrimental, both to the livestock industry and the long term vegetative habitat in the Gunnison Basin.

II. PLANNING ISSUE FOUR/ LOCAL ECONOMIES

Planning Issue 4. of the DRMP states:

"In view of the importance of recreation and tourism for local economies, what steps can be taken to improve recreation diversity and opportunities, while preserving the resources necessary for desirable recreation settings?" DRMP, pg. 1-6.

Pursuant to the authority contained in 43 CFR 1610.4-1 (1990), which authority allows for changes in planning criteria based on public suggestions, the GCSA requests that Planning Issue 4 be changed and the DRMP revised to reflect planning based in part on the following planning criteria:

In view of the importance of recreation, tourism and agriculture for local economies, and the interrelationship between these industries in the planning area, what steps can be taken to improve the diversity and opportunities for both recreation and agriculture, while preserving the resources necessary for both a desirable recreation setting and a stable local agricultural economy?

This change is requested because, it simply requires the RMP be developed based on the actual realities of the current socio-economic situation of the local economy in the Gunnison Basin and because it is much more consistent with the officially adopted Land Use Resolution of Gunnison County. Under 43 CFR 1610.3-2 (1990), RMPs must be "consistent with officially approved or adopted resource

related plans and the policies and programs contained therein, of...local governments"...

Gunnison County has adopted a Land Use Resolution under the authority granted it by the State of Colorado for a number of distinct purposes, including:

"(5) To encourage and strengthen the established industries of agriculture, mining, tourism and education." Gunnison County Land Use Resolution, 2nd Ed., May 8, 1984 as amended May 16, 1989, pg. 1.

In furtherance of that policy, Section 2-102(1) of the LUR announces as follows:

"Section 2-102. ECONOMIC LAND USE POLICIES. The following are the economic land use policies of Gunnison County:

(1) To encourage and strengthen the existing industries of agriculture, tourism, recreation, mining and education; to promote greater diversity in the County economy to broaden employment opportunities and reduce seasonal employment fluctuation in a manner that will not endanger or detract from the foregoing existing industries." (emphasis added).

Planning Issue Four simply is not consistent on its face with this basic policy of the local government as is required by 43 CFR 1610.3-2(a)(1990). It clearly does not address the impact on local economies as is expressly required by 43 CFR 1601.0-8 (1990) because it ignores the agricultural industry. As the representative of the existing agriculture industry in Gunnison County, GCSA requests that Planning Issue 4 be revised as stated above and appropriate revisions in the DRMP be made based on the new planning criteria.

III. WILDLIFE ISSUES

A. Elk Populations

The DRMP, under Wildlife Habitat Management, includes the following statement for standard management in some form under nearly all the proposed alternatives:

"The Habitat Management Plan (HMP) for the planning area would be revised and implemented consistent with BLM's Fish and Wildlife Plan for Colorado-Program for the Decade. . . Objectives of the revised HMP would include, but would not be limited to, methods to manage public lands "to help meet CDOW long range herd goals." DRMP, pg. 3-103,3-104.

In fact, at several points in the DRMP reference is made to a goal being "to help meet CDOW long-range herd goals", See, e.g., pgs. 3-118, 3-123, 4-6.

However, in striking contrast, at no point in the DRMP is there reference made to a similar goal of the BLM being to reach full Active Authorization of all Grazing Preference AUMs currently legally

15. The BLM would continue to work closely with CDOW at all levels regarding herd goals and carrying capacities on public land.

16. The boundaries of Management Units for the alternatives in the DRMP are shown on Maps 1 through 4 in an envelope in the back of the DRMP, at a scale of 1:200,000 (1"=3.15 miles). Regarding Management Unit E-7, a unit recommended for ACEC designation in Alternative E, specific input from the public was solicited regarding the nomination of the ACECs the BLM would screen for further analysis. See Appendix H for a discussion of the ACEC process and the nominated ACECs. The BLM, during the 90-day public input period for making comments on the DRMP, did solicit input on all elements of the DRMP, including all unit boundaries. Earlier input from the public was solicited at scoping meetings and through newsletters.

17. We realize that the majority of elk and deer winter ranges on BLM managed lands are also important spring and early summer livestock grazing ranges. This recognition has been included in the descriptions of Management Units 7 and 12 in the PRMP.

18. Our winter range maps are based on information collected by individuals in our office over several years of monitoring, and information from the CDOW and the Forest Service. These maps depict areas that elk and deer depend on during the winter months. The maps are not based on land ownership, and do include private, state, and Forest Service lands, since the animals migrate back and forth across the Planning Area. Many of the resource data maps BLM uses in RMP preparation tasks include these same or different mixed ownerships. These maps are not meant to imply that BLM authorizes the use of private lands for any purpose, or that BLM exercises any authority for the use or grazing of wildlife on private lands. The BLM will continue to establish and manage capacities for BLM managed lands only.

19. Please see the response to comment 18 of this letter. By law, the BLM must consider adjacent property in the development of RMPs. The BLM proposes no management actions for private lands in the Planning Area. Maps showing all habitat types considered and utilized in the DRMP and PRMP are available for review in BLM's Gunnison office.

20. The required mitigation for sagebrush treatments in the DRMP has been changed such that these measures in the PRMP are guidelines that would be considered whenever possible as land and vegetation treatments are planned and implemented. The lands that the measures would apply to has also been changed. Please refer to Appendix A in the PRMP for the changed guidelines. The guidelines would not necessarily limit opportunities, but could alter traditional ways that land or vegetative treatments have been accomplished on public lands in the Planning Area. Instead of treating large blocks of sagebrush for one resource, plans would include possible methods to benefit other resources, such as sage grouse. Also, plans may limit the amount of sagebrush that can be treated in one area.

The guidelines would affect the decisions in the referenced document just as the PRMP would be effected. Please refer to page 2-5, Chapter Two, of this PRMP for a discussion of the relationship of this PRMP and the April, 1980, Draft and the September, 1980, Final Gunnison Basin Livestock Grazing Environmental Impact Statements.

10 authorized in the Gunnison Resource Area, i.e., 62,390 AUMs. These AUMs have been legally authorized under the authority of the Taylor Grazing Act of 1934, 43 U.S.C. 315, et. seq., and reaffirmed under provisions of FLPMA, 43 U.S.C. 1701 et. seq., yet many are currently being held in suspension. The contrast on this issue is at the heart of a number of resource management issues in the Gunnison Basin and while we recognize that the DRMP includes "recommendations" for short term reductions in certain big game populations, the GCSA objects most strongly to the overall theme of the DRMP in this area.

11 The Gunnison County Stockgrower's Association believes that it is time to critically re-examine the working relationship of the BLM, the CDOW, the USFS, and the private land ownership entities as regards the habitat capacity for terrestrial wildlife in the Gunnison Basin. GCSA believes that the current long term goals of the CDOW in terms of elk numbers in local DAUs are too high with increasing controversy and significant resource damage on both public and private land as a consequence. Elk numbers over much of the Planning Area have risen dramatically over the past few years and despite nearly five months of hunting during recent years, with resultant impacts to both public and private land from the increased recreational activity, the post-hunt numbers remain well above the CDOW long-range goals. As the major representative of the private land ownership base in the Planning Area, the GCSA believes that as part of this RMP process, the big game population goals in the Gunnison Resource Area must be determined based on the habitat capacity of the critical winter range areas. This effort must take place at this stage of the management/planning process during the development of the RMP, as the RMP will guide and drive all subsequent activity plans.

The BLM, as the manager of the public land, has a broad responsibility to the public to maintain or improve the habitat for wildlife. We believe part of that responsibility is insuring that population levels for wildlife, just like stocking rates for domestic livestock, are consistent with the available critical habitat. This simply was not done in the DRMP and is required under the BLM's own authorities. As such the DRMP is legally insufficient and incomplete.

Under 43 CFR 1601.0-5(k)(1990), a Resource Management Plan means a land use plan as described by FLPMA. It "generally establishes in a written document:

(2) Allowable resource uses (either singly or in combination) and related levels of production or use to be maintained," 43 CFR 1601.0-5(k)(2)(1990)(emphasis added).

In developing the RMP, the District or Area Manager is required to analyze the inventory data collected on significant issues and decisions with the greatest potential impact. 43 CFR 1610.4-3 (1990). They are required to "determine the ability of the resource area to respond to identified issues and opportunities." 43 CFR 1610.4-4 (1990). A factor to be considered is:

"(d) The estimated sustained levels of the various goods.

50 services and uses that may be attained under existing biological and physical conditions...." 43 CFR 1610.4-4(d)(1990).

Finally the regulations provide a firm requirement that "the District or Area Manager shall estimate and display the physical, biological, economic, and social effects of implementing each alternative considered in detail." 43 CFR 1610.4-6 (1990).

The BLM Manual also provides that the first goal of overall habitat management is to "ensure optimum populations and a natural abundance and diversity of wildlife resources on public lands..." BLM Manual, Part 6500.12 A., 6/17/88.

The BLM Manual further states "it is BLM policy to manage habitat with emphasis on ecosystems to ensure self-sustaining populations, BLM Manual 6500.06, 6/17/88, and to "prepare and maintain on a continuing basis, an inventory of the wildlife and fish resources, plant communities, and threatened, endangered, and candidate (special status) species on the public lands. BLM Manual 6500.06 (A.), 6/17/88.

12 Based on this significant regulatory authority concerning wildlife populations and the planning process, GCSA has carefully and critically reviewed all the underlying data supporting the DRMP/EIS as well as the DRMP itself for evidence that the population levels were recommended based on a careful and detailed review of the capacity and capability of the winter habitat to support those population goals. That review included the MSA/RAP for Wildlife-Intro, and the MSA/RAP for Wildlife, Elk/Deer prepared 1/13/89 by Mr. Joe Capodice. Additionally, we have reviewed the current HMP executed June 7, 1982 by the then Area and District BLM Managers and the then Regional Manager of the CDOW. We have also reviewed "A Fish and Wildlife Plan for Colorado-Program for the Decade, referenced in the DRMP. That document is ambiguous and avoids the issue, contemplating that big game habitats will be managed "in accordance with population levels stated in resource management plans and in the Colorado Division of Wildlife's Data Analysis Unit Management Plans." Fish and Wildlife Plan for Colorado, (1990), pg. 21. It then further states that a planned action is to "maintain wintering big game populations at levels compatible with forage resources." Id., (emphasis added).

None of these documents addresses specifically and in detail, the habitat capability of the various critical winter ranges in the Gunnison Planning Area to maintain the various projected or desired big game populations. While the MSA/RAP of Mr. Capodice generally discusses trend, utilization in certain vegetative types, the analysis is at a background level only in the most general terms. Under the regulations, BLM is legally required in both the MSA and the RMP to develop and consider "critical threshold levels" in the formulation of planned alternatives. See, 43 CFR 1610.4-4(i)(1990). For the Gunnison Resource Area, the capacity of the winter big game habitat is such a critical threshold level.

The consequences of this inadequacy within the DRMP are

The 1982 HMP would be revised to accommodate the decisions in the approved RMP. The HMP objective for sage grouse are to maintain habitat on 200,000 acres of public land to support minimum population of 24,000 sage grouse, and maintain nesting cover for sage grouse on over 200,000 acres of public land by providing a minimum of 20% canopy closure of sagebrush or 50% of the land area with slopes less than 12% within two miles of identified leks. If necessary, this and other objectives in the HMP would be revised as a result of the Approved RMP.

Site specific areas have not yet been identified for proposed range treatments. Selection of sites would be based on factors such as livestock use, sagebrush cover, lek locations, and potential for improvements. Treatments would also consider or include grazing systems that would achieve better understory conditions, including non-traditional grazing processes, such as intensive grazing for short periods of time.

According to C. Braun, a recognized sage grouse expert, existing hunting seasons in the Gunnison valley do not have an effect on overall grouse populations, because up to 50% of the small game bird population will die by the end of the year regardless of whether or not they are hunted. Hunting seasons are based on taking a portion of this 50%.

Based on sage grouse harvest data, trends in harvest have remained fairly consistent over the past 10 years, with a 10-15% variability. Historically, sage grouse harvests were much higher than 500 birds. Long-time residents of the valley talk about grouse being harvested in wagon-loads.

The BLM has no information on the effects of predator impacts to grouse within the valley; however up to 50% of the birds have been taken by predators in other locations.

11. The size of Management Unit E-11 is based on the need for management of sage grouse habitat in the unit, and overall biodiversity of the Planning Area. Economic dependence or contributions are only one of the many factors used to decide the management for a particular area in the RMP process. Existing conditions, needs, and manageability are other factors, but these are not all-inclusive. Granted, it is difficult to determine the exact degree of local dependence on grouse, but individuals come from as far away as Denver, Colorado Springs, Canon City, Pueblo, Alamosa, Montrose and Grand Junction to hunt Gunnison grouse. Research shows that the sage grouse in the Planning area are unique compared to other western grouse, and as a result of habitat alteration or eradication, the Gunnison valley habitat and population could be considered to be very important to the viability of the species.
12. The DRMP does not recommend the introduction or reintroduction of species, but rather authorizes the inventory and consideration of such actions for certain species at a possible later date. As such proposals are made, they could be authorized according to the referenced language. Factors and questions identified in the comment, in addition to many others, would be considered in the environmental analysis, which would be subject to public review before decisions are made to actually implement proposals.
13. Please refer to the prescription for Management Unit 2 in the PRMP for information on introducing moose into the referenced area.
24. Please refer to numbered item 4 on page 4-8, and to the last paragraph in the left-hand column on page 4-9 in the PRMP for language regarding adjustments in grazing preference.

12 significant. First, the planned population levels in the RMP are suspect. At best they are an educated guess. At worse, an arbitrary and capricious determination by management. Secondly, the failure to address habitat capacity potentially constitutes an abdication of the broad management authority of the BLM over the public lands in favor of the State wildlife agency. Third, the DRMP leaves unresolved many critical issues such as: a) the actual effect on prior AUM allocations for livestock and wildlife; or b) whether the BLM has determined that current populations are "reasonable" within the framework of the MOU of 2/14/75 executed between the BLM and the CDOW.

13 The complexity of the issue of big game population levels is indicated perhaps best by simply comparing previous stated goals and objectives and current actual numbers. The 1980 Gunnison Basin Grazing RIS was developed based on elk numbers at 8,500 head. The 1982 Habitat Management Plan was developed and based on 8,200 head. The DRMP asks for "short term" reductions basin wide to an "interim" level of 8,800 head. The CDOW long-range goal, which is referenced at several points in the DRMP as a goal of the BLM, is 9,000 head of elk basin wide. The actual post hunt populations indicate a steady increase in populations, even through significant post-season cow hunts have been authorized by the CDOW and encouraged by local interests. The actual numbers since 1980 have been reported to us by the BLM in supporting materials. In not one year over the last decade are those levels at or below the 9,000 head CDOW goal, let alone the levels contemplated by any of the aforementioned BLM documents. Those actual post hunt population numbers should be reproduced in the DRMP and the consequences of that increase, including an analysis of forage consumption by big game on BLM lands, fully disclosed in the DRMP.

14 As a consequence of these concerns, the Stockgrowers hereby request that as a condition of approval of the RMP that the BLM develop and determine, within the context of a new MSA/RAP on wildlife what the sustainable big game habitat capacity is on BLM lands within the Planning Area giving due consideration to other existing authorized uses, including livestock grazing at preference levels. Then as a further condition of approval of the RMP additionally require (not just recommend) that populations of elk and deer be brought into compliance with the stated long term goals of the CDOW within 12 months of approval of the RMP using whatever available authority the CDOW may have to achieve such goals. Further, as a condition of approval of the RMP, if the new MSA/RAP determines that an additional downward adjustment to the above referenced sustainable big game habitat capacity is necessary, that such be required to be achieved within 24 months after RMP approval.

B. Management Areas E-7 and E-12.

16 The GCSA has serious reservations about the concept, philosophy, and process used to develop the boundaries and management framework for Management Units E-7 and E-12 or similar management areas contained in other alternatives. The particular detailed boundaries of these areas are not well-defined anywhere in the DRMP/DEIS.

25. The definitions of the terms "allocate" and "authorize" have been included in the Glossary of the PRMP, as they relate to resource management in the BLM.

Allocate: To define allowable resource uses and related levels of production or use to be maintained.

Authorize: To grant permission, usually of a discretionary nature, to engage in an allowable use.

26. See the response to comment 41 of letter 38. In addition, please refer to page 4-5 in the PRMP for information regarding reduction of wildlife numbers.

27. The last sentence at the top of the right-hand column, page 3-105, under Livestock Grazing Management, would include, by inference, range improvements within the context of livestock management practices and techniques that may be required to achieve the identified riparian area objectives. This language would permit the development of range improvements as one technique to help achieve riparian zone management goals. See also the third sentence in the paragraph in Standard Management for Riparian Zones, page 3-103, for additional language regarding improvements.

28. Please refer to the Standard Management for Livestock Grazing Management in the PRMP, pages 4-6 through 4-11, for language that has been modified to clarify how livestock grazing management, including managing for minimum stubble heights, would be implemented. Flexibility in the application of stubble heights that would be possible is also described. Allotment Management Plan preparation is also discussed in greater detail in the same section in the PRMP.

Minimum stubble heights are recommended in order to achieve the resource conditions in the Standard Management section for Livestock Grazing Management, and in prescriptions for certain of the Management Units in the PRMP. In riparian areas, achieving these levels would help maintain plant vigor and production, provide for quality livestock forage and wildlife habitat, provide a minimum of plant residue to trap sediment during high flows, buffer or reduce the energy of high flows, reduce erosion, and protect streambanks. The implementation of stubble heights could occur within a variety of grazing systems, including non-traditional or rest or deferred rotation patterns.

29. Please see the response to comment 28 of this letter. In addition, the requirement to maintain a minimum stubble height for a period of time is a term or condition that could be incorporated into a grazing lease or permit if felt to be appropriate by BLM. The Section 8 of the Public Rangelands Improvement Act (PRIA) mentioned in the comment consists of two statements that modify language in Sections 402(d) and (e) of the Federal Land Policy and Management Act (FLPMA). The language in Section 402(e) of FLPMA provides for the incorporation of terms and conditions into grazing leases and permits that are deemed appropriate by BLM. The incorporation of these appropriate terms and conditions would occur with the appropriate coordination occurring between all affected parties. Please refer to the revised Livestock Grazing Management section of Standard Management in Chapter Four of the PRMP for clarification regarding implementation of minimum stubble heights, and the how the recommendations would be incorporated into AMPs or grazing agreements.

30 and 31. Please refer to pages 4-5 and 4-9 in the PRMP for revised language clarifying how new available forage would be allocated for wildlife and livestock grazing management purposes. Also, on page 4-9 in the PRMP, forage allocation procedures in 43 CFR 4100 (specifically, see 43 CFR 4110.3) would include considering using new available forage to increase active use (AUMs).

16 Specific input from the adjoining private landowners on these boundaries was not sought. Previous experience of our membership with similar National Forest planning on this issue makes GCSA very wary on this issue. The specifics of the area boundaries, proposed management guidelines, future forage authorizations, and habitat capacity need to be clearly developed in a consensus manner if the RMP is to be ultimately successful in resolving these issues. More importantly, the management area proposals fail to recognize that much of this area is "critical range" as distinguished from "elk and deer crucial winter range". What is important to elk and deer wintering is equally important for spring and early summer livestock grazing range. The total habitat is important for a number of uses and an emphasis in those areas for big game winter range, when the Wildlife numbers are in excess of long term goals whose credibility can be seriously challenged, results in a de facto single use management emphasis which GCSA will not support.

18 GCSA's select committee has reviewed the detailed mapping of wildlife winter range provided by the Area Manager in supplemental materials. That committee noted that the detailed mapping contained and included significant acreages of private land owned or controlled by many of our members. Many of our membership are resentful of the excessive use of certain of their lands during critical periods of the year by big game, particularly when big game numbers are in excess of goals contained in the BLM 1980 Grazing RIS, the 1982 Habitat Management Plan, and even the long term goals of the CDOW. As a consequence, private lands should not be considered as critical winter range for purposes of population goals or recommendations unless there is express authority from the owner for such use and at the levels contemplated. GCSA wishes to clarify that the existence of any map containing private land marked as "big game winter range" or any similar designation creates no inference that any authority exists for the use or grazing of wildlife on these lands in the absence of the express consent mentioned above.

19 The DRMP should be revised to reflect these concerns. Projected wildlife winter range and herd goals should be based on the private land actually available and authorized for such use. As currently managed, the DRMP's herd recommendations contained in Appendix A reinforce an existing burden on the private lands in the planning area to sustain elk herds at unreasonable levels. Further the DRMP should include the detailed mapping, and such mapping should be appropriately revised.

C. Sage Grouse and Sage Grouse Habitat

The DRMP proposes in the Preferred Alternative the designation of approximately 11% of the total Planning Area for management to improve and maintain sagebrush vegetative communities in order to optimize sage grouse populations. (Units E-11 and E-14). Frankly, the membership of GCSA (many of whom participate in and enjoy sage grouse hunting) was alarmed at the scope and scale of the designation of these management areas, being in excess of 60,000 acres, much of it critical spring and summer livestock range.

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Specifically, the DRMP fails to address fully the effects of the proposals incorporated in Management Units E-11 and E-14 and Appendix A. The RMP contains the following statement in addressing the proposed management Unit E-11:

"Sagebrush treatments and management to improve sage grouse habitat would be incorporated into all AMPs or CRMAPs, and their design, implementation, and management would include as a minimum the standards and techniques in Appendix A." DRMP, pg. 3-122.

The DRMP is incomplete and leaves several issues unresolved in this area. For example, what will be the net effect on land treatment opportunities as a consequence of the restrictions and conditions proposed in Appendix A? How do these restrictions mesh with the range improvement programs of the Gunnison Basin Grazing EIS? How do they alter or amend the 1982 HMP? What and where, site specific to the ground, are the land treatments proposed to increase understory vegetation in Units E-11? See, DRMP pg. 4-61. What changes in present hunting management would facilitate a faster response in sage grouse populations? Where in the DRMP is there a discussion of the trends in harvest other than "about 500 birds are taken annually". DRMP, pg. 2-26. What is the effect of natural predators on the sage grouse populations?

Finally, the DRMP and the MSA/RAP leave open the question of the relative economic importance of the sage grouse to the community and call into questions the scale of the areas designated for sage grouse management. In the MSA/RAP Wildlife-Sage Grouse, Mr. Joe Capodice, in describing any known dependency (economic or otherwise) on the sage grouse resource reported:

"It is difficult to determine how much local businesses depend on this portion of the entire hunting season." GRA-MSA/RAP/WLF-SG, January 13, 1989, pg.7.

Against this factual statement, the District and Area Manager were legally required as the basis for formulating reasonable alternatives in the RMP to consider:

"(c) Resource demand forecasts and analyses relevant to the resource area;" 43 CFR 1610.4-4 (c)(1990), and

"(g) Degree of local dependence on resources from public lands". 43 CFR 1610.4-4 (g)(1990).

In the face of Mr. Capodice's statement, the GCSA seriously challenges whether the Preferred Alternative complies with the regulatory requirements as to the demand for the sage grouse resource and the relative degree of local dependence on the sage grouse when +10% of the total planning area is proposed to be designated for management emphasis for this one resource. The DRMP needs significant revision in this area to address these issues.

D. Antelope

The Preferred Alternative states that "inventories would be completed to identify suitable areas in which to establish new populations of big horn sheep and pronghorn antelope; supplemental releases and reintroduction could be authorized by the District Manager following environmental analysis. . . . Monitoring studies would be established within pronghorn antelope ranges." DRMP, pg. 3-104.

This is an issue that having been raised in the MSA and the RMP should be resolved by the RMP. Users of the public land and the public are entitled to have some indication of what the intentions of the BLM are on this issue. GCSA cannot rely on open-ended possibilities in the DRMP, given the experience of the livestock industry in other areas of the state with severe, almost explosive growth of antelope herds once established. Several key issues should be addressed on the antelope issue or the possibility of new populations, supplemental release or reintroduction withdrawn from the DRMP. For example, where are the likely new suitable areas? How many would have to be introduced to maintain the projected populations? What is the current habitat capacity considering other pre-existing resource uses? What is the degree of local dependence on this resource? (Mr. Capodice reports in the MSA that there is none). What are the realistic sustained levels of antelope that may be attained given the historic severity of winter in the Gunnison Resource area? See, 43 CFR 1610.4-4(d)(1990)?

E. Moose Introduction in Powderhorn Primitive Area SRMA

The DRMP, under Management Unit E-2, contains the following statement:

"The unit would be evaluated and considered for moose introductions, which could be authorized by the District Manager following environmental analysis". DRMP, pg. 3-113,114.

Much the same as with antelope reintroduction, having opened the door, the DRMP should further address the issue and resolve it. It should not be left to future analysis to resolve these kinds of issues, as the likely result will be the requirement for an amendment to the RMP. As the District or Area Manager is required to estimate and display in the RMP the physical, biological, economic, and social effects of implementing each alternative considered in detail, 43 CFR 1610.4-6 (1990), GCSA requests that either this proposal be dropped from the DRMP, or a complete analysis of the issue take place prior to final approval of the RMP. Issues would include habitat capacity, reciprocal impacts of moose and recreation activities on each other, population levels and goals, available winter range without impact on private property.

IV. FORAGE ALLOCATIONS-

A livestock operator's grazing preference on a particular BLM allotment is established pursuant to the Taylor Grazing Act of 1934, 43 U.S.C. 315 et. seq., based on historic use. It does not change

The forage allocation methods, considerations, and procedures referenced above in this response (specifically in the paragraph immediately before the subheading "fences" on page 4-9 in the PRMP) are very similar to current procedures. Any incentives that have existed in the past to continue rangeland improvements would not be diminished as a result of implementing the recommendations in this PRMP.

32. Specifics regarding how and when range readiness would be utilized have been modified and expanded upon in the Livestock Grazing Management section of STANDARD MANAGEMENT in the PRMP. See item 4. under *Monitoring and Range Readiness*, pages 4-10 and 4-11, in the PRMP.

33. See the response to comments 46 and 47 of letter 38. In addition, no ranking order of resources was developed or followed in the development of Alternative E or the PRMP. By nature, the Preferred Alternative (Alternative E) is a mix of various management unit prescriptions and resource uses that were analyzed in Alternatives A, B, C, and D. Alternative E was developed over time, considering these other alternatives, the impacts that would occur as a result of implementing the other alternatives, and as much other information as could be assembled. The impression could be conveyed that, because of the size of some units in Alternative E or the PRMP, a ranking order was developed and followed, but that was not the case. Alternative E does emphasize the enhancement of riparian areas, wildlife habitat, and recreation values in a general multiple use environment.

34. The subject impacts have been reworded in the PRMP to indicate that a decrease in Planning Area income and employment could result if AUMs are decreased.

35. The referenced language in the subject MOU between the BLM and two state agencies regarding the South Beaver Creek area could be construed to mean that BLM had, in 1988, predetermined that the area in the MOU would be designated as an ACEC. The MOU explained that BLM would, through the now on-going RMP process, propose the area for designation as an ACEC (page 1 of the MOU). The area was recommended and considered in the RMP process according to applicable guidelines and regulations. A full range of reasonable alternatives, including two "no designation" alternatives and three alternatives with various sizes and management scenarios for the proposed ACEC were analyzed in the DRMP. If designated as an ACEC, the area would be managed according to the prescription for unit 8 in the PRMP, which incorporates much of the management addressed in the MOU.

36 and 37. The boundaries for the South Beaver Creek ACEC were based on geographical features, slope, habitat sites that are similar to existing occupied locations, and manageability.

The known populations of skiff Milkvetch cover only 185 total acres but the plants are concentrated in many small areas over a much larger area. Our goal in establishing the South Beaver Creek ACEC is to protect areas of known populations and similar potential habitat for this U. S. Fish and Wildlife Service category 2 plant. Management of other resource values such as grazing, recreation and minerals would be carried out in such a manner as to minimize potential impacts to the species and habitat (see the response to comment 8 of letter 38). The ACEC management plan to be prepared would include the management actions listed in the prescription for Management Unit 8 in the PRMP. Some of these actions are listed below.

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and consists of both active use and suspended use. However, it is clear that through land use planning, (such as the development of this RMP) the authorized officer may identify the need for changes in the preference status or more simply, in the mix of active versus suspended use. Specifically, pursuant to sections 2(b)(2) and 4(b) of the Public Rangelands Improvement Act of 1978, 43 CFR 4110.3 provides that the authorized officer may make changes in the grazing preference status, but that "these changes shall be supported by monitoring, as evidenced by rangeland studies conducted over time, unless the change is either specified in an applicable land use plan or necessary to manage, maintain or improve rangeland productivity." 1d. The process of determining how much forage to provide for all grazing animals (both wildlife and livestock) during the land use planning process "allocates" or "apportions" forage, while the actual active use of a certain amount of forage under a given permittee's preference is to "authorize" its use.

As a consequence of these principles, obviously the RMP will set through the process of allocating forage, the general and specific levels of livestock grazing that will occur in the Gunnison Basin over the planning interval. In many respects, this is the critical component of the RMP for the livestock industry and for related segments of the local economy. Key issues are the allocations of presently existing forage, allocations of new or additional forage, and range readiness.

A. Allocations of Presently Existing Forage:

24 GCSA will support allocations of forage for livestock use at current levels as referenced in the DRMP as total grazing preference of 62,382 AUMs in the Resource Area. Notably absent from the DRMP, however, is a detailed plan on the part of BLM management for the return to active status of all "suspended non-use" AUMs currently authorized on this Resource Area. This appears to be an area of considerable weakness in current management as the Area Manager has indicated to us in supplemental materials that "No suspended Non-Use preference AUMs were restored to active status since the 1980 Grazing RIS for the Planning Area." Letter of Teleffson, May 17, 1991, pg. 3.

GCSA cannot support the additional conditions placed on the forage allocations as set out in standard management under either Alternatives B, D, or E. These conditions have been extensively reviewed by the select committee. They have determined that those alternatives would create a significant hardship upon that segment of the local livestock industry heavily dependent upon BLM lands.

Of specific concern are the proposals on pgs. 3-104, 3-105, and 3-106. They have been the subject of extensive review and discussion. Of notable concern are the following items:

25 1) apparent confusion in various areas of the RMP over the use of the terms "allocate" or "apportion" vs. "authorize". These terms have very specific meanings and applications and it is evident that there was confusion by the DRMP drafters in some areas as to the correct or intended use of these terms.

26 2) There appears to be a guaranteed forage allocation "at current levels" to wildlife on pg. 3-104. At the same time the forage allocation to livestock "at current levels" on pg. 3-105 is expressly made subject to a very stonuous list of conditions that apparently do not apply to the wildlife component. Obviously, all classes of grazing herbivores impact and influence the vegetative and riparian resource and equal responsibility for grazing conditions should be placed on both the livestock and wildlife segments.

27 3) There is a notable absence of "range improvements" as a listed strategy to maintain or improve the conditions of the riparian system in the Planning Area on pg. 3-105.

4) The requirement of a 2 1/2 inch minimum stubble height maintained throughout the grazing season. (Notably absent is a similar requirement for big game use.)

These comments have already discussed in detail concerns about the absence of a detailed plan for range improvements in the DRMP. The "stubble height" proposal in its variations also represents a significant departure from prior BLM policy. It also indicates a lack of confidence by BLM planners in the Allotment Management Planning process and reflects what we believe to be a management decision by BLM to depart from required and expected AMP development and revisions.

28 Under FLPMA and PRIA, allotment management plans are to be "tailored to the specific range condition of the area to be covered by such plan" and are required to be developed in "careful and considered consultation, cooperation, and coordination with affected permittees or lessees, landowners involved, the District Grazing Advisory boards where established, and any state having lands within the area to be covered by such an allotment management plan". 43 U.S.C. 1751(d). The requirement of the "three Cs" was enacted in 1978 as an amendment to FLPMA in response to concerns that the land management agencies were planning without regard to legitimate concerns and input from parties clearly affected by and interested in the development of management principles for the range resource.

While an allotment management plan is required to be "in conformance with the land use plan as defined at 43 CFR 1601.0-5", it remains the document that "shall prescribe the livestock grazing practices necessary to meet multiple-use management objectives." 43 CFR 4120.2-3. Stubble heights and any similar specific management practices should therefore be developed as part of the "activity plan" level, subject to the "three Cs" and appellate review.

Therefore, GCSA objects and will challenge, if necessary, provisions of the DRMP which lay out "stubble height" minimum requirements of any height as a rule of general applicability in this resource area. That requirement is obviously not specifically tailored to the individual range conditions existing on a given allotment in the resource area. Nor does it take into account various patterns of use such as rest or deferred rotation grazing which result in heavy use of short duration followed by significant

1. No additional forage allocations for wildlife or livestock in the unit.
2. No authorization for domestic sheep grazing.
3. Limiting motorized recreation to designated roads
4. Controlled surface use stipulations on oil & gas leases.

In other words, other resources and uses, including recreation, would continue to be managed in such a way as to ensure the survival and enhancement of the Skiff Milkvetch. The only differences in management of resources in units D-1 and E-8 would be that the management of visual resources and rights-of-way would be less restricted in unit E-8.

The planning team analyzed the other alternatives with related impacts and identified an alternative that, in their judgement, best resolved the concerns and issues and provided at least the minimum determinations as required by law.

38. Unit E-10 is important bighorn sheep habitat. The referenced livestock grazing recommendation would not be changed in the PRMP. Competition with domestic sheep for forage and space, along with livestock associated parasites and diseases, has been implicated as the principal cause of bighorn decline since the late 1800s. Research by Goodson (1982), Spraker (1990), and Ondeska (1988), regarding co-use of ranges shows that there is considerable risk to bighorn sheep from displacement of the wild sheep from valuable range, interbreeding, and disease, when intermingling occurs. Co-use of ranges by domestic and bighorn sheep has been consistently linked with declines, die-offs and extinction of bighorn populations from historical to recent times. Therefore, in this unit, BLM has determined that domestic sheep grazing would not be authorized.
39. In the judgement of BLM, the subject project is still contributing to soil erosion prevention and other objectives. The BLM would gladly tour the project with interested parties to discuss the project objectives.
40. When the Record of Decision and Approved RMP are published, the BLM will prepare the implementation plan. The implementation plan would establish the general sequence of actions that would occur in order to execute each planned decision. The decisions that will be contained in the Approved RMP and Record of Decision would be implemented at the rate and in the proper sequence that funding will permit. Bureau priorities will be considered at all levels in determining the funding allocated to implementing these decisions.
41. Please see the response to comment 9 of letter 35.

28 rest. These are existing grazing patterns which have been encouraged by the BLM.

29 More importantly, through the stubble height requirement, the proposed RMP is attempting to adopt a specific and material portion of the range management practices directly applicable to all permittees and lessees in the resource area. In so doing, affected permittees, lessees, landowners, the District Grazing advisory boards, and the State are being deprived of their statutory rights to have material portions of their grazing practices developed in AMPs only after close and considered consultation, cooperation, and coordination. They are further being denied their rights to have AMPs developed that are specifically tailored to the range conditions of their allotments. Congress clearly intended that material portions of grazing activity would be developed in a cooperative fashion and the DRMP on the "stubble height" issue deprives those within the protection of Section 8 of the Public Lands Improvement Act of 1978 their rights afforded them by that statute.

B. Allocations of New or Additional Forage:

Under Alternative E, the Preferred Alternative, there is an express allocation of new forage or additional forage to watershed, then to livestock or wildlife. Under Alternative C, new or additional available forage would be allocated to livestock then to protect and manage watershed resources. Under Alternative D, such new or additional available forage would be allocated solely to protect and enhance watershed resources. Under Alternative B, such forage would be allocated in priority order 1) watershed resources, 2) wildlife habitat, and 3) livestock grazing. It is not clear exactly how the additional forage might be allocated between livestock or wildlife depending upon management area or project sponsor, or both. Nor is it clear how such an allocation can legally occur without considering the suspended AUMs discussed above.

30 Perhaps a larger problem is one of incentive for permittees to continue range improvements. If there is no assurance that new forage will be fairly allocated, then permittees, who are potentially the largest, best source of immediate range improvement in cooperation with the BLM, have little or no incentive to participate. Many permittees have taken significant reductions in grazing authorizations over the past several decades with assurances made time and again that when range conditions improved, past reductions would be restored. Given the elk population numbers and actual authorized livestock use basin-wide, a credible argument can be constructed that de-facto, any new forage now being created is already being allocated and consumed by wildlife.

31 GCSA requests that the BLM develop, prior to approval of this RMP, the specifics of how new forage will be allocated in the Planning Area and how additional reductions in forage will be allocated over the life of the RMP. Such specifics should include, in addition to considerations already in the DRMP: the source of funding for any range improvement projects, the prior history of management and improvements on the allotment, the levels and numbers

of suspended AUMs available, whether increase or decrease in wildlife numbers have occurred on the allotment since the 1980 grazing EIS, specific standards for determining that prior allocations have been met. This issue is an obvious and serious problem with the RMP that needs to be addressed and resolved.

C. Range Readiness:

32 Those BLM permittees involved on the GCSA select committee expressed strong reservations about the use of the range readiness criteria listed in Appendix B. GCSA therefore, will object to what appears to be the full adoption of the USFS, Region 2 criteria instead of the development of independent criteria by the BLM specific to this Planning Area. While there are certain allotments that contain both BLM and USFS lands, in general it was the consensus that the utilization of the USFS criteria should was improper.

BLM lands in the Gunnison Basin are at a lower elevation generally in the Planning Area than most USFS lands. Readiness should be based on histories of use and prior monitoring on an individualized allotment basis, and should consider the type of management occurring on an allotment by allotment basis. The DRMP does not provide for this.

V. RESOURCE RANKING

33 During the review of the DRMP, GCSA has noted that Alternatives B, C, and D all contain a relative ranking table indicating the relative order of resources. However, for the Preferred Alternative, Alternative E, no such ranking order of resources was developed. Obviously, some relative ranking has occurred in the allocations of the various land and system resources covered by the DRMP. The act of designating unit boundaries on a macro or micro scale, the development of management prescriptions, and the overriding legal and policy guidance all implicitly require some inherent relative ranking of the various resources. So does "the opinion of the preparers". See, DRMP, pg. 3-100. Because of the concerns already outlined in these comments, GCSA would like to see consistency in the document and a relative ranking priority of the resources used in developing the Preferred Alternative E included in the DRMP.

34 GCSA has noted and requests revision of the paragraph on pg. 4-55 discussing Impacts from Livestock Grazing Management under the Preferred Alternative. The inference, when compared to the previous paragraph on Impacts on Wildlife Habitat Management is that financial losses for the affected ranching operations apparently do not translate into decreases in Planning Area income and employment. Ranches employ people, purchase supplies and materials and pay sales, income, and property taxes. All of these activities are interrelated and a decrease in AUMs will ultimately affect Planning Area income and employment. The real issue is only one of scale. The two paragraphs read together are indicative of an inherent bias in the RMP to which we object.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

VI. SOUTH BEAVER CREEK ACEC

GCSA is opposed to the designation of Management Units incorporating the South Beaver Creek ACEC. The grounds for this opposition are both substantive and procedural.

A. Procedural Concerns:

GCSA is in possession of a 1613(162) letter to interested parties of July 20, 1989 (attached to these comments and incorporated by reference hereto) which notified said interested parties that on February 14, 1989, the Gunnison Basin Resource Area held an evening workshop to discuss and receive nominations for ACECs. The letter further informed interested parties that on May 31, 1989 a BLM interdisciplinary team met to determine which nominations met both the "relevance" and "importance" criteria under 43 CFR 1613. South Beaver Creek, which was nominated by the BLM, is listed as having passed both "relevance" and "importance" criteria and became a "Potential" ACEC.

GCSA is also in possession, as supplemental materials further provided by the BLM of the South Beaver Creek Proposed Research Natural Area Cooperative Agreement. That document was executed August 29, 1988 by the District Manager of the BLM, the Director of the Colorado Division of Parks and Outdoor Recreation, and the Chair of the Colorado Natural Areas Council with the approval of the Colorado Attorney General's Office (attached hereto and incorporated by reference).

Specifically, that mid-1988 document states that the BLM intended at that time to propose, through the development of this RMP that the property in that document (appr. 880 acres) be designated and managed as an ACEC. Further, the agreement required prospectively that "upon BLM designation of the Property as an Area of Critical Environmental Concern" the Board would list the Property as a designated Natural Area of the Colorado Natural Areas System and provide the BLM with a certificate of designation and a signed copy of the Articles of Designation. BLM agreed to management of the Property in conformance with federal law and the Gunnison Resource Management Plan (which hasn't been approved) its amendments and revisions. BLM further agreed, among other things, to:

1. "take necessary action to protect the plant."
2. "No alterations, chemical spraying, or other procedures that will or may harm or destroy individuals of the endangered species, *Astragalus Microcarybus*, will be permitted."
3. "The BLM will monitor and control grazing of domestic animals on the Property...."
4. "If off-road vehicles are causing adverse impacts to the plants the area shall be closed out outlined in the ORV regulation 8341.2 Special Rules".

5. "Default by the BLM may result in the removal of the Property from the Colorado natural Areas System."

6. "This agreement shall remain in effect from the execution date through the completion of the Gunnison Resource management Plan;..."

The effect of this agreement is that nearly ten months before the BLM's interdisciplinary team reportedly formally met to determine which areas met the "importance" and "relevance" criteria allowing such area to be considered as a "Potential" ACEC, BLM had effectively committed itself to in fact designate 880 acres as an ACEC and additionally had contractually committed itself to certain management restrictions for the benefit of the Colorado Natural Areas Program. While not express on the face of the document, it is implicit that the above "interim management" would be incorporated into the RMP, and in fact they do appear in the Preferred Alternative.

This pre-existing contractual commitment by the BLM as to the express intentions to designate this area severely undermines the integrity of the whole process used to determine both this particular designation and the RMP. Indeed the Area Manager has subsequently indicated "that for Alternatives B, C, D, and E, management of the skiff milkvetch species would occur according to the referenced MOU." Letter of Tollefson, May 17, 1991.

Obviously, any number of groups of resource users of the public lands would like similar contractual commitments as to express management to be incorporated into the RMP prior to the beginning of the formal RMP process. The South Beaver Creek ACEC should be deleted to remove this taint.

B. Substantive Concerns

The Area Manager has reported that there are 185 acres of public land containing known colonies of skiff milkvetch in the Planning area in the South Beaver Creek area. Letter of Tollefson, May 17, 1991. Against this the DRMP proposes 4,565 acres as an ACEC in the Preferred Alternative based on this plant species and up to 9,562 acres under Alternative D.

The acreage involved, frankly seems very excessive to protect the 185 total acres. How and why were these particular boundaries determined? How are they tailored to provide the desired protections and still serve other multiple use values? What impacts will this designation, on this scale, have on recreation activities in South Beaver Creek? What, specifically, exclusive of the above referenced MOU, did the Area Manager use to determine that the choice in Alternatives E makes up the best mix of resources and resource uses in a multiple use framework?

VII. MANAGEMENT UNIT E-10: EXCLUSION OF DOMESTIC SHEEP GRAZING.

The DRMP at pg. 3-121 contains a statement to the effect that domestic sheep grazing would not be authorized in the unit to help

38 prevent disease spreading from domestic sheep to bighorn sheep. A portion of our membership has indicated that they may desire to run domestic sheep in advance of cattle in the early spring in that area to graze down larkspur prior to entry of the cattle. Therefore, GCSA requests that this restriction be removed to allow management flexibility in the future. Other steps besides the total elimination of grazing of domestic sheep are available to prevent the spread of disease and the DRMP does not address them.

VIII. LONG GULCH SEDIMENT CONTROL AND RIPARIAN HABITAT IMPROVEMENT PROJECT.

39 GCSA requests that the RMP provide for the BLM to re-evaluate this project and its continued feasibility prior to continuing it further. We have concerns about whether the project is meeting its goals and it is creating an undue hardship on the grazing permittees involved. We would recommend that the Area Manager schedule a time to take interested parties on a tour of this project to provide a first hand review of the feasibility of the project.

IX. BLM FUNDING FOR EACH ALTERNATIVE AND THE PLANNING FRAMEWORK:

A Resource Management Plan generally establishes in a written document:

"(3) Resource condition goals and objectives to be attained;

"(4) Program constraints and general management practices needed to achieve the above items;"

"(6) Support action...as necessary to achieve the above;"

"(7) General implementation sequences, where carrying out a planned action is dependent upon prior accomplishment of another planned action;" See, 43 CFR 1601.0-5(k) (1990).

In the face of these requirements, the DRMP contains the following two statements on pg. 3-3: "...it is not practical to develop land use decisions and allocations based on what funds might or might not be available," and "A 15 percent increase over the base budget (in real dollars) for the life of the plan would be needed to implement any of the alternatives."

40 These statements simply point up a serious deficiency in the DRMP. Obviously, in the face of the above regulations, the funding for each alternative is a program constraint for whatever plan is adopted. What are the general implementation sequences that will be adopted given a shortfall of funding? How practical and legal is this plan if it is based on a known shortfall of funding to implement any alternative?

41 Additionally, it is very likely that the DRMP does not comply with NEPA on this issue. There is no possible way for users under the plan or interested publics to comment meaningfully on the various alternatives when there is not a comparison of the various

41 alternative's costs or benefits provided by the DRMP/EIS. Each Alternative Summary section should give some indication (beyond the 15% projection above) of the relative costs of that alternative over the life of the plan. Without it, the DRMP/EIS is insufficient.

These issues as to the funding of the various programs within the RMP are not trivial. The supplemental information from the Area Manager indicates that over the previous 10 years, over \$521,000 dollars has been spent solely in planning related activities and of that, fully \$327,000 dollars have been spent in developing this DRMP in the fiscal years 1988, 1989, 1990, and 1991. That amounts to \$80,000 per year for planning or roughly 20% of the annual budget for the Gunnison Area office as reported in the RMP. GCSA would strongly encourage the management officers of the BLM in this area to closely examine their priorities and this RMP to insure that they are getting a maximum output of their resources to the land that they manage. The DRMP does not address these concerns, which are at the center of many of the resource issues in the RMP.

GCSA has had an opportunity to review the comments on the draft RMP to the BLM by Mr. Kenneth Ochs, Ochs Bros. Ranch and by Mr. Yoshi Lutwak of the Gateview Ranch at Powderhorn. We are generally supportive of the concerns, comments and inputs contained in those letters on the DRMP.

X. ADDITIONAL COMMENTS

GCSA will support the following specific elements of the RMP:

A. The proposed management of 320 acres in Wildcat Creek drainage to help protect the water supply of the Town of Crested Butte.

B. The designation of the American Basin ACEC (Management Unit E-4).

C. The designation of the Redcloud Peak ACEC (Management Unit E-5), with the caveat that grazing of domestic sheep be expressly allowed to continue within the ACEC.

E. The designation of the Slumgullion Earthflow National Natural Landmark ACEC (Management Unit E-6).

F. The designation of the Dillion Pinnacles ACEC, provided however, that the acreage level of 190 acres proposed by Alternative D be utilized, and with the further stipulation that any acquisition of non-federal land for inclusion into this ACEC result in a "no net loss" of non-federal land in Gunnison County thereby requiring an offsetting relinquishment of federal lands in Gunnison County.

G. The suitability determinations in the Lake Fork of the Gunnison Wild and Scenic River Study Report that found no segment of the Lake Fork to be suitable for Wild and Scenic status. We support this determination as the area is adequately protected by the existing management.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

XI. CONCLUSION

The Gunnison County Stockgrowers Association believes that the DRMP is in need of substantial revision in order to adequately and accurately reflect the issues inherent in the Planning Area.

We cannot support key provisions of the Preferred Alternative that place further restrictions on the livestock industry while abandoning essential elements of the 1980 Grazing EIS. We believe the various population goals for big game contained in BLM's own documents points up the need for determinations based on habitat capacity which has not been done. Those habitat capacity determinations for big game are a "critical threshold" determination legally required in the formation of the RMP.

The manner of selection of the South Beaver Creek ACEC is seriously tainted with a pre-determination in advance of the formal processes for the ACEC designation or the RMP having begun.

Much additional work needs to be done to recognize and develop the proposals for Management Units E-7 and E-12 for those proposals to have any chance for successful implementation. GCSA will not support the E-7 designation at the scale it is now being proposed.

The costs of the various alternatives and a relative ranking of resources and resource uses for the Preferred Alternative are notably absent from the DRMP/EIS.

Specifically on the forage allocation issues, we would welcome the opportunity to meet further with the BLM management in an effort to resolve what are serious differences. In order to be ultimately successful the guidelines proposed on pgs. 3-104 and 3-105 need to be credible, fair, and supported by the various involved entities. WHAT IS PRESENTLY PROPOSED IS NOT SUPPORTED BY THE LOCAL LIVESTOCK INDUSTRY AND NEEDS FURTHER EFFORT ON THE PART OF ALL CONCERNED.

Thank you for your careful review of these comments and be assured that GCSA will continue its active role in the development of a Resource Management Plan for the Gunnison Basin that represents sound applications of multiple-use principles with appropriate regard for the rights of individuals and the needs of the local communities.

Very truly yours,

THE GUNNISON COUNTY STOCKGROWERS ASSOCIATION

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cc: Gunnison County Commissioners
Ben Nighthorse Campbell
Bob Moore
Cy Jameison

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 51

Mr. Bill Bottomly,
RMP Team Leader
Bureau of Land Management,
2505 S. Townsend Ave.
Montrose, Co 81401

Yosi Lutwak
Gateview Ranch
P.O. Box 801
Gunnison Co 81230

51

Re: Comments on Gunnison Resource Area R.M.P. and E.I.S.
draft March 1991.

Dear Mr. Bottomly:
Here are my comments on the draft. It does not always follow the order in the book but will note a reference to the book.

1. All through the draft there is a very poor financial analysis of all economic data. For instance, in judging different alternatives for timber management you write the loss of x amount of revenue in case of not logging a certain area. You need to analyze how much it will cost the B.L.M. to prepare a timber cut vs. the revenue. Since our environment is high desert and trees don't replace themselves very rapidly you may be losing money from logging operations, which means that if you stop or reduce the logging you will actually be more profitable. The same is true for cattle grazing. You need to know the net income. When you mention closing certain areas for cattle grazing there is no mention or analysis of the financial loss. You project an increase of tourism in the different alternatives (40% in alt. E). There is no financial analysis of how much more revenue it will bring or how much more expenses you will have (trash removal, staff, management, etc.) If I ran our operation with such poor analysis I would be bankrupt in a very short time.
2. We have protested for many years the inclusion of the lower Lake Fork River in the Alpine Triangle S.R.M.A. These are very different environments, not cohesive geographically and should be managed separately. (2-32) (3-10) (3-110) The Alpine area is high mountain tundra mostly federally owned, while the lower Lake Fork is irrigated hay meadows mostly privately owned with a few federally owned tracts in between.
3. In wildlife habitat management (3-23) (3-113), you mention evaluating Moose introduction. I strongly oppose this idea. Moose are not native to this area and are not needed here for any reason. You claim that this area has problems with its riparian stream beds and introduction of Moose will be devastating to those areas. An E.I.S. for the next decade should deal with that problem, since it has already come up

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as a possibility.

51

4. There is no plan in the R.M.P. to get revenue from the Colorado Division of Wildlife (DOW) for the grazing of game animals. Game are not just "wildlife" anymore but a financial enterprise run by the State of Colorado. There should not be a difference between A.U.M.s used by cattle, sheep, elk or deer. Right now domestic animals are paying for the grazing management cost and therefore subsidizing the State of Colorado. Your program of collecting fees from outfitters is a wrong approach to charge for the grass eaten by game animals and should be dropped, the cost associated with collecting outfitters permit fees will never worth the revenue received.
5. DOW plan calls for increasing Deer numbers in units 66/67 from 3000 to 6800, that is 126% increase in the Deer population! Elk numbers will grow from 3000 to 3800 that is 25% increase. Where will all these A.U.M.s come from? Unfortunately wildlife, just like cows, tend to concentrate in the lower elevations especially in the spring time, which is the critical time for plant growth. Until the DOW can figure out a way to distribute the Elk and Deer the numbers should be cut instead of increased. They cause much damage to the lower elevations in both units to private and federally owned lands. How will all these deer and elk keep the stubble bright directive? they graze the creek bottoms to nothing in the spring, when it is needed to capture the water. The E.I.S. ignores this major change and offers no solution for the next 10 years.
6. In table 2-20 "FISHERY STREAMS IN THE PLANING AREA" you designate Indian Creek as a fishery stream. This is a straight out lie! Your biologist, Joe Capodice, has checked the stream and found no fish in it. Ask anyone around and you won't find anyone who is living today that has fished in it. You have to designate it as an intermittent stream. Indian Creek is probably an intermittent stream because it was heavily logged in the past and now the BLM is in the process of logging it again in spite of all our protests. Keep logging it and it will dry up in June!
7. In alternative D there is no financial analysis of forest management vs. grazing allotments. You plan to harvest a lot of timber as in D-21 (3-96) and eliminate cattle for 5 years from the cut area. This is totally inconsistent with the objective of alternative D and there is no plan for alternative grazing or payment for fencing or any reasoning whatsoever for that choice. Also forage utilization on uplands is reduced to 20-30% and no financial

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1. Thank you for the suggestions in the comment. Also, please see the response to comment 9 of letter 35.
2. The rationale for the boundaries of the Alpine Triangle SRMA are based on the extent of recreation use. The entire area has popular recreation attractions that are used by a variety of groups mainly centered out of Lake City but also coming from other parts of the state and the country. The amount of use of these resources necessitates more intensive recreation management which is the main purpose of SRMAs. The Recreation Area Management Plan for the SRMA recognizes similarities throughout the area by establishing general management guidelines and objectives. At the same time, management actions are prescribed to meet the needs of a given area, such as the lower Lake Fork Area.
3. Please see the response to comment 25 of letter 38.
4. There are no mechanisms available to charge the state of Colorado for wildlife use on public land. The state manages wildlife for all the people of Colorado and a portion of the income generated from license fees goes into protecting and improving wildlife habitat.
5. The BLM charges guides and outfitters fees in order to ensure a fair return to the public when private businesses earn financial gain from the use of public land or public resources. In addition, the operation of these businesses on public lands are monitored to ensure compliance with applicable permit conditions and terms. In the Gunnison Resource Area this program annually generates, on average, over \$10,000 in fees and costs approximately \$3,000 to administer, making it very cost effective. The fees generated from recreation permits are returned directly to this Resource Area to support recreation management activities such as the maintenance of trails, roads and other facilities.
6. Please refer to the response to comments 11, 15, 16, and 20 of letter 38, regarding carrying capacities and the relationship between CDOW and BLM regarding requests for reductions in population numbers. Also, please refer to the response to comment 13 of letter 50 for information regarding the manner in which elk population estimates are calculated during the year.

Long range herd goals for deer in GMU 66/67 have been 6,800 since 1985. According to information in our files, this is over a thousand deer less that originally proposed for this area in 1978. BLM is not aware of any CDOW plans to manage for 3,800 elk in these units. As of 1990, elk populations for those units are approximately 2,739.
7. Indian Creek was listed as fishery stream because it has been identified as a stream that has a potential for supporting a fishery. The flow in Indian Creek during spring, summer and fall of 1990 (the third year of a significant drought) was sufficient to maintain a fishery. While it is true that past logging has had adverse impacts on Indian Creek, those impacts are lessening as the logged areas are revegetating. Management aimed at improvement of the Indian Creek riparian area is expected to reduce sedimentation and increase the duration and amount of stream flow.

A BLM timber sale is on-going in the area of the West Fork of Indian Creek. When completed, the sale will result in the harvest of 715 MBF of lodgepole pine, Englemann spruce, and Douglas fir. The BLM would continue to monitor the sale.
- 8 and 9. Please refer to the revised language in the Livestock Grazing Management section of STANDARD MANAGEMENT in Chapter Four of the PRMP for clarification on implementing stubble heights. Forage allocation adjustment procedures are also addressed in this section of Chapter Four of the PRMP.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

1 analysis is offered. 51

8 8. You can not just change stubble height across the area. Every allotment is different and many allotments have AMPs with rest and rotation programs. AUMs are a part of the grazing rights and you can not change them through the back door through changing stubble height across the board. It should be decided for every allotment on an AUM basis and on range condition.

10 9. In alternative E you have designated the whole length of Indian Creek as E-15. I have already discussed the mistake in designation but in addition to it the suggestion of 4" stubble height is impossible. In allotment #103, Lower Indian pasture, the 1/2 mile of creek serves as a watering hole at that end of the pasture. Therefore it is impossible to implement the 4" stubble height limit. This situation will worsen if Deer and Elk numbers are increased. In Upper Indian pasture the bottom of the creek is the majority of the pasture so you can not keep the cows off the bottom. Upper Indian is always grazed after plants have gone to seed. The cattle stay there only 2-3 weeks on the average. I don't see any room or need to change the grazing plan for that pasture, only to stop logging it and replant the millions of trees you have removed over the last 100 years. I request a complete stop to all logging operations in Indian Creek water-shed, in order to reduce sediment levels in the stream and lengthen the flow period. (4-66) E 15

11 10. In the summary of livestock grazing program by allotment in appendix B table B-5, allotment #6103. The range condition numbers are taken from 1977 survey (14 years ago!), that was done after the most severe drought. Gateview Ranch has been intensively managed to improve the allotment and have experienced tremendous results. We cannot include this allotment in this RMP unless we update the condition statistics to where the range is now. Allotment #103 is also categorized as an "I" allotment because many years ago we were convinced by BLM personnel that under this designation they could get money for range improvements. It has nothing to do with the condition of the range. Therefore I respectfully ask that allotment #6103 will be categorized as "M" before the final RMP is drafted.

13 11. In alternative E (3-112) the BLM is planning to acquire administrative access into Yeager Gulch, Skunk Creek and Trout Creek. There is absolutely no need for those accesses they are a disguise for public vehicular access in a very steep forested environment. It will cause unnecessary wild life disturbance, grazing allotment disturbance, increased

Page 3

14 erosion and will shorten the flow season in the streams. It serves no purpose in the management of the forest. There is no need for a "drive in" management for these ridges that do not need often check-ups. This forest should be left completely alone after the past abuse the BLM has inflicted on it.

This comment was not printed and is not related to the content of the Draft Resource Management Plan/Environmental Impact Statement or the Proposed Resource Management Plan/Final Environmental Impact Statement.

15 13. Under "alternative E impacts" (4-57) subsection "impacts from transportation and access", you claim that acquiring access into 12 areas would "improve soil and hydrologic conditions". I challenge that assumption. The way you get new accesses is by selling timber and getting the logging companies to build the roads. Building roads and cutting timber in this environment of high mountain forested desert, deteriorates soil and hydrologic conditions.

16 14. Under "alternative E impacts" (4-63), you claim that "Harvesting of Ponderosa Pine and Douglas Fir will decrease wildlife habitat." At the same time you propose to dramatically increase the number of elk and deer in areas 66/67. That is a contradiction. You can not burn both ends of the stick. If the game numbers go up you need to at least leave the habitat alone, not to reduce it by cutting timber or new roads.

17 15. "Alternative E impacts" (4-73), is an inaccurate impact conclusion at best, as far as the Powderhorn area is concerned. If this alternative E is implemented I see deterioration of habitat conditions for wildlife, and deterioration of stream condition. Reduction of livestock utilization in riparian areas, is not a cure all medicine. It is needed in some places but is only a small part of a total program.

18 16. Alternative E objective (3-106), "Emphasis would be given to the maintenance of watershed, soil and vegetative resources in all timber sales". It is not enough to write that down and think the land will be protected. You are not protecting the land with your logging operations. To the

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10 and 11. The lower portion of Indian Creek has been deleted from unit 15. Please see the folded map of the PRMP inside this document for the portion of Indian Creek that is now included in unit 15, which would be subject to a 4" stubble height during the period of grazing use. Please also see the response to the comment directly above this one.

12. The first timber sale by BLM in the Indian Creek drainage was in 1967. Adequate stocking exists in all the units except for an 11 acre unit which will be reforested as funds allow. Only 2% of the drainage been logged. Forest management is a recognized resource management within BLM. Any future logging occurring in Indian Creek would be conducted only after the preparation of a timber sale plan and an EA that would address all required mitigation, including that necessary for water and soil resources. Public review of any potential sales would occur.

13. When the conditions on the subject Allotment are evaluated during categorization review, and if they have changed enough to warrant a change, the change would be made then.

14. Almost 4,000 acres of suitable commercial forest lands exist in Management Unit E-1 in the Preferred Alternative. Access would be for administrative purposes only and not for public access. No significant impacts were identified from acquiring such access on soil and water resources, riparian zones, terrestrial wildlife and habitat, fishery resources, or livestock grazing management. Positive impacts were identified as a result of increased access facilitating management of previously inaccessible lands and resources.

15. The section you refer to on page 4-57 discusses impacts. The impacts mentioned in the section are those that would occur to soils and water resources as a result of acquiring access into the 12 areas in the various Management Units in Alternative E.

16. The concerns on page 4-63 address a specific type of habitat (thermal and hiding cover) rather than habitat in general. When timber types are cut, existing habitat is altered and new ones created benefiting some wildlife and impacting others. The BLM is not aware of any proposal by CDOW to dramatically increase elk numbers. Existing elk numbers are within 10% of their long range herd goal.

17. In the long term, the recommendations effecting the riparian areas in unit E-2 in the DRMP would result in improved conditions in these riparian areas, which could mean more eventual forage for livestock and wildlife.

18. Please see the response to comment 12 of this letter.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

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contrary! Watersheds in the Powderhorn area have been destroyed again and again by the BLM's forest harvesting methods. From the old ones in the turn of the century to the more recent ones, as the one near Cebolla Creek that was never harvested because the timber quality was bad. After bankrupting the logger, no one else would even bid on it. To the current one in Dutch Gulch that has been protested for many reasons, to no avail. You have a terrible record in managing the forest in this area and according to this RMP, I see a disaster in the next 10 years.

Basically this R.M.P. contradicts itself in many places, has been written in the office without understanding of the land managed and with insufficient E.I.S. It should be written again from the ground floor and this time the objectives should be followed to achieve the desired end.

Respectfully Submitted
Gus Lutwak
Gustav Lutwak
Gateview Ranch
P.O. Box 801
Gunnison, Co 81230

Page 5

Responses to letter 52

1 through 5. See the responses to comments 1 and 2 of letter 8, 4 and 2 of letter 12, and 3 of letter 8, respectively.

June 7, 1991

Hugh Jameson
3100 Taylor Ave
El Paso Tx 79930

52

Mr Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 South Townsend Ave
Montrose Co 81401

Re: Draft RMP/EIS

Dear Mr Bottomly:

As an annual visitor to southwestern Colorado including the scenic corridor from Durango to Gunnison, I am most concerned that the scenic natural beauty of the area be preserved and enhanced so that we and future generations may continue to enjoy these natural attributes. As an outdoorsman and member of the Audobon Society, I am concerned about plans that might result in the degradation of these natural attributes or disturb and/or impair the ability of wildlife to survive.

To this end, we wish that ecological and scenic values are among your concerns as a manager of our public lands. Your decisions may impact the scenic heritage that we seek to preserve for generations to come.

1 | We would like to suggest that the designation of the Lake Fork of the Gunnison River as a wild and scenic river is a step in the right direction. There are important geological, visual and recreational values at stake along this corridor.

2 | In addition to protecting the river corridor itself, the adjacent surrounding lands also need to be protected and preserved by designating the entire Alpine Triangle area as an Area of Critical Environmental Concern. You are well aware that this area is among the most popular and heavily visited lands under your management. This is no accident. Americans enjoy these valuable natural attributes and return year after year to enjoy them once again. They are worth preserving.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

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- 2 Also in need of ACEC designation are areas such as Cebolla Creek east of the Powderhorn Primitive Area and the East Gunnison immediately east of Gunnison, Colorado. These important habitat and winter range areas for wildlife survival need the ACEC designation in order to facilitate the recovery of elk, deer & bighorn sheep herds to self-sustaining levels.
- 3 In terms of recreational management we encourage more hiking and bike trails and stringent prohibitions with regard to the use of any motorized vehicles on any new trails that are developed on
- 4 BLM lands outside of wilderness areas. public access via motorized vehicles will only result in degradation of fragile eco-systems.
- 5 The same concerns may also be expressed with regard to management practices that permit inappropriate or over-grazing of rangeland.

Sincerely,


Hugh Jameson

Response to letter 53

- 1. See the response to comment 1 of letter 8.

53

BILL BOTTOMLY,

4/5/91

I HAVE A FEW COMMENTS ON THE RMP/EIS FOR THE GUNNISON RESOURCE AREA. ONE MAJOR CONCERN IS THAT LAKE FORK OF THE GUNNISON WAS NOT RECOMMENDED TO BE DESIGNATED AS A WILD AND SCENIC RIVER. I ALSO READ THAT ~~SOME~~ ^{MANY} AREAS AROUND LAKE FORK WERE NOT TO BE PROTECTED. I'VE BEEN TO THE LAKE FORK AREA A FEW TIMES AND THINK IT IS BEAUTIFUL. MANY PEOPLE VISIT THIS AREA. PLEASE DESIGNATE LAKE FORK A WILD AND SCENIC RIVER AND PROTECT MORE OF THE AREA AROUND IT IN THE FINAL RMP/EIS.

SINCERELY,


DENVER, CO. 80220-4822
900 On eida St.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 54

STATE OF COLORADO
Roy Hornet, Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
1000 UNIVERSITY BOULEVARD
P.O. Box 1000
6060 Broadway
Denver, Colorado 80216
Telephone: (303) 897-1192

54



300 West New York
Bunnison, Colorado 81230

Barry Tollefson
Bureau of Land Management, Area Supervisor
Bunnison Resource Area
216 N. Colorado
Bunnison, Co 81230

June 8, 1991

Dear Barry:

The following are my comments on the "Draft" Resource Management Plan for the Bunnison Resource Area. Joe Cappodice and I have previously discussed some of the issues and comments which follow. Likewise, Area Wildlife Manager, Jim Young and I have discussed my comments and he concurs with my comments. I have only commented on the preferred alternative (Alternative E) since I felt this was also the preferred choice with my comments taken into account. For lack of a better method, I have addressed issues as they come up in the draft by title and page reference.

- 1 Terrestrial Wildlife and Habitat, pp. 3-104
Elk and Deer Habitat: I do not feel that recommending a change in long-term herd objectives is an appropriate way to handle a short-term overutilization of forage in isolated areas. These objectives are set based on a large amount of public input, biological data and would be difficult to justify changing everytime over-use occurs. I feel that a short-term increase in license numbers in the affected BRUs to handle a short-term problem would be more appropriate. Also, herd numbers should be based on transition range herds rather than crucial range (one of every ten winters) herds.
- 2 Pronghorn Antelope and Bighorn Sheep Habitat:
Pronghorn antelope habitat should be managed for the following herd objective numbers:
RSU 551 500 animals (including north of Highway 50)
RSU 67 200 animals
RSU 66 100 animals
Total 899 animals
- 3 Sage Grouse Habitat:
Throughout the text for the various management areas for Alternative E, it states that "no surface-disturbing activities would be permitted within 1/4 mile of all leks during the April 1 through May 31 strutting season".

DEPARTMENT OF NATURAL RESOURCES, Ken Salazar, Executive Director
OLDF COMMISSION: Ellen Cooper, Chairman; Larry M. Wright, Vice Chairman; Louis F. Smith, Secretary
+ Chavez, Member + Tom Van Matton + Rebecca L. Fink, Member + George Vandenberg

page 2

- 4 I do not feel that a 1/4 mile buffer around active grounds during the critical season is adequate. I think the buffer should be increased to a minimum of a 1 mile radius. The key point to reemphasize is this restriction is during April 1 through May 31 only and would be a built-in safety valve for projects such as the Chance Gulch mill tailings project.
- 5 Fisheries Resources:
Livestock grazing in stream fishery areas should be managed closely to reduce streambank erosion, turbidity and stream braiding.
- 6 Livestock Grazing Management:
Public lands currently unavailable for livestock grazing should remain unavailable. Also, those allotments which currently allow domestic sheep should be converted to cattle only allotments when they become vacant.
- 7 Turkey Habitat (New Category):
Potential turkey habitat should be evaluated with measures taken to protect and enhance potential turkey habitat. Habitat should be managed to support introductions of Merriam turkeys with a long-range goal of 400 birds. The areas of primary interest are in the Powderhorn area and Currecanti Creek.
- 8 Moose Habitat (New Category):
Inventories of potential moose habitat and carrying capacity should be conducted. Habitat should be managed to support a moose introduction and long-range herd goal of 300 animals.
- 9 Wilderness Study Areas; pp. 3-107
Wildlife management activities in these areas would be conducted in a cooperative manner with the CDOW for all fish and wildlife management activities.
- 10 Law Enforcement; pp. 3-109
BLM Ranger patrols should be increased during the peak periods of use such as during big game hunting seasons.
- 11 Wildlife Habitat Management; pp. 3-113
I agree with comments on moose introductions in the primitive area.
- 12 Management Unit E-10; pp. 3-121
Currently, a bighorn sheep disease problem exists in the Ceboja Creek area which is believed to have originated from exposure to domestic sheep. A bighorn sheep transplant proposal has been approved for the past 3 years with sheep planned for the Cochetopa Canyon area when sheep become available. This new transplant should be protected by not allowing any domestic sheep grazing in this area and reducing them on existing allotments. This would concur with the recommendation made in the Livestock Grazing Management section for this unit.
- 13 Management Unit E-11
Concern exists basin-wide for the low amount of wet meadow and open water areas available for sage grouse. Water catchment devices and development should be a priority as it appears that one major limiting factor on sage grouse is water.

- 1. The BLM desires to cooperate with CDOW at all levels to arrive at a workable solution to improving wildlife forage and habitat conditions on the public land winter ranges, such that a proportionant share of the long-range deer and elk herd goals could be supported while sustaining these improved conditions. A short-term increase in license numbers for a year or two may not be the best way to bring about these improvements, and would perhaps not result in long-term improvements in wildlife forage and habitat conditions. These types of changes, rather than occurring immediately, happen over time. As stated in the DRMP and in several of these responses, public land winter ranges support elk long range herd goals at this time, but habitat conditions can only marginally support deer long range goals. Table A-3 in the DRMP identifies herd goal numbers that, if achieved for some interim period, would begin to improve some of these areas, in the judgement of BLM. As the table indicates, most of our concerns are centered around deer numbers, since they tend to stay on the winter range longer.
- 2. Crucial winter ranges on public lands are those locations that deer and or elk use on an average winter, although the numbers can vary depending on snow conditions, as opposed to being based on those severe winters the valley gets approximately once every ten years. These are locations where deer could be found during any winter, whether severe or light. In the judgement of BLM, using transition range carrying capacities could lead to establishing herd goals that are higher than winter ranges can carry.
- 3. This recommendation was not included in the DRMP, and to consider it at this time would necessitate sending a newly analyzed DRMP out for review. The BLM would, after the approval of this RMP, consider the request and cooperate in the environmental documentation and plan amendment process before reaching any decision.
- 4. Please see the response to comment 5 of letter 47.
- 5. The Objective of the proposed riparian management along fishery streams is to improve or maintain the stream habitat to acceptable condition. This is expected to result in reduced streambank erosion & damage, reduced sedimentation and turbidity and maintenance or improvement to the morphology of stream channels to provide the optimum fish habitat for a given stream channel type.
- 6 and 7. Please see the Livestock Grazing Management section in STANDARD MANAGEMENT, Chapter Four, for information regarding lands unavailable or unsuitable for grazing. The BLM would determine, based on the overall management goals and objectives for a unit, how lands would be managed if no longer utilized for domestic livestock grazing.
- 8. Please see the response to comment 1, letter 47. In addition, any proposals for reintroductions or introductions would have to be consistent with overall management unit objectives.
- 9. At this time the Powderhorn Primitive Area is a Wilderness Study Area and has been recommended to Congress for wilderness. If designated as wilderness, BLM would not consider the introduction of moose into the area. Moose could be considered for introduction in the unit, if consistent with unit objectives, if Congress acts upon and does not designate the area as wilderness.
- 10. The management of fish and wildlife resources on all public land, including Wilderness Study Areas (WSAs), would be conducted in cooperation with the CDOW, and would follow the Bureau's Interim Management Policy for Lands Under Wilderness Review (IMP).

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

page 3

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Management Unit E-12 pp.3-123
CDOW herd objectives in GMU 55 are not exceeded currently for elk (according to 1991 winter survey and herd model information). You cannot "suppose" that herd numbers are too high in parts of the unit for the condition of the grouse species. Some areas in transition ranges act as a "vacuum" for wildlife based on availability and palatability. Even if numbers were cut by 50% in these areas, utilization by those animals present would still be high. Habitat enhancement in many satellite areas is the key to range improvement.

14

Appendix A Wildlife Management
As is the case with most of this text, the term "public lands" is used very loosely to describe what is intended to mean those public lands managed by BLM. This usage of the phrase is confusing since public land should mean all non-private lands in the resource area (i.e. USFS, BLM, NPS and State lands).

15

Map A-3 Pronghorn antelope range
Pronghorn range should extend west of Highway 114 to Kesar Basin. The new release in Chance Gulch is not accounted for as well as north of US Highway 50 where currently up to 25 antelope have been documented from Woods Gulch to Mora Gulch.

16

An additional note of concern: The draft RMP book I am using is missing the map for Alternative E and I do not know what the Management Unit designation is for the area from Currecanti Creek to Gunnison. However, Jim Young has requested that consideration be given in this unit to an expansion of bighorn sheep range in this area to support up to 100 sheep to be transplanted at various locations along this stretch. Also, domestic sheep interaction in this area should be minimized to prevent disease.

17

Thank you for the opportunity to comment on the draft RMP. If you need further explanation of these comments, please do not hesitate to notify either myself or Jim Young.

Sincerely:


Thomas J. Bezzel
District Wildlife Manager


Jim Young
Area Wildlife Manager

11. As our manpower and funding capability increase, so would the potential to increase patrols on public lands.
12. Please refer to the Livestock Grazing Management paragraph in the prescription for unit 10 in the PRMP. Domestic sheep grazing would not be authorized. Please also refer to Appendix A, PRMP, for grazing allotments where livestock use has been, or is proposed to be changed to cattle only in the area of unit 10, in order to prevent diseases being transferred to bighorn sheep.
13. The BLM agrees that wet meadows and open water are important to sage grouse management and viability. The construction of water developments would be authorized in the DRMP as part of habitat improvement (please refer to page 3-104, *Sage Grouse Habitat*, of the DRMP). Water projects would be an important part of sage grouse habitat improvement.
14. According to winter surveys over the nine years preceding 1991, and herd model information, CDOW herd objectives in GMU 55 have been exceeded. Efforts to improve the range would probably include recommendations to reduce population numbers.
15. The term "public lands" is defined in the Glossary. For convenience, the section of the PRMP entitled "SUMMARY OF THE PROPOSED RESOURCE MANAGEMENT PLAN" contains the definition also. Many non-private lands are not available for public use, and therefore would not qualify as "public lands".
16. The referenced map is included as Map 3-1 in Chapter Three of the PRMP, with the noted changes that reflect additional pronghorn antelope habitat. The BLM plans to monitor the antelope north of U. S. Highway 50 for a longer period before including that area on our map of pronghorn antelope range.
17. Consideration for the reintroduction of bighorn sheep is covered in language in the DRMP on page 3-104. When proposals are made to the BLM, analysis and evaluation would be conducted before decisions are made. The Preferred Alternative in the PRMP contains recommendations to not authorize domestic sheep grazing north of U. S. Highway 50 in unit E-7, which corresponds to the area of concern in the comment.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 55

1 through 5. See the responses to comments 3 of letter 8, 4 and 2 of 12, and 2 and 1 of letter 8, respectively.

Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 South Townsend Avenue
Montrose, CO 81401

55

June 10, 1990

Dear Bill:

I am writing to urge you and your colleagues to make several changes in the final RMP/EIS for the Gunnison Resource Area. Among the changes that I believe should be made are:

- 1) Initiation of grazing management procedures that will protect riparian habitat, control sediment loss, and restore the rangeland to good condition. I am tired of trying to camp in sites that are full of cow or sheep manure, going to the high country to view the wildflowers only to find them trampled or eaten by domestic sheep, being bitten by sheep flies, and trying to fish for trout in streams that are full of manure and sediment from livestock traffic. I know first-hand that the "management" of grazing areas by your agency has had significant and inexcusable impacts on the public lands under its jurisdiction.
- 2) More hiking trails need to be constructed to accommodate the increased demand of hikers. Motorcycles and ORV's must be restricted to existing trails at all times.
- 3) The addition of the Alpine Triangle, BLM land east of Gunnison, and Cebolla Creek to the list of ACEC designations.
- 4) The recommendation that all of the Lake Fork from its origin at Sloan Lake in the Handies Peak proposed wilderness to Blue Mesa Reservoir be designated a wild and scenic river. This river has many outstanding visual, geologic, and recreational values that need to be preserved and enlarged.

The BLM is to be complimented for including the West Antelope Creek in its proposed ACEC designation for the area. I am hopeful that you will reconsider and make the important changes I have recommended here.

Sincerely,

Barbara Bernhardt
Barbara Bernhardt
66217 West Rose Road
Montrose, CO 81401



56

THE WILDERNESS SOCIETY

June 11, 1991

Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 South Townsend Avenue
Montrose, CO 81401

Dear Mr. Bottomly:

Please accept the following brief comments on the BLM's draft Resource Management Plan and Environmental Impact Statement for the Gunnison Resource Area.

Areas of Critical Environmental Concern

We are happy to see the six Areas of Critical Environmental Concern (ACECs) recommended in the draft, but urge you to also include the following as ACECs:

- 1) Alpine Triangle -- The entire triangle should be designated in order to protect the areas outside the Lake Fork of the Gunnison River corridor. This area is one of Colorado's most popular, and one of the nation's most scenic. It includes habitat for the rare Uncompahgre Fritillary butterfly (candidate for threatened/endangered listing), three 14,000-foot peaks (Handies, Sunshine, and Redcloud), important habitat for bighorn sheep, and Slungullion National Natural Landmark.
- 2) East Gunnison -- The lands just east of Gunnison are important deer and elk winter range, and the riparian areas found here are suffering from overgrazing.
- 3) Cebolla Creek -- This area contains important bighorn sheep habitat.

Grazing

Overgrazing is a serious problem on much of the rangeland in the Gunnison Resource Area. Significant amounts are in either

Responses to letter 56

1 through 3. See the responses to comments 2, 3, and 1, of letter 8, respectively.



APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Page Two
Mr. Bottomly
BLM Gunnison Resource Area

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2 fair or poor condition. The BLM should manage grazing in a way that protects habitat (especially riparian areas), and improves habitat which has already been damaged. While The Wilderness Society does not call for an end to all grazing on public lands, we advocate the elimination of grazing where the habitat cannot sustain it.

Wild and Scenic Rivers

3 All of the Lake Fork of the Gunnison should be recommended for Wild and Scenic River designation, and it is disappointing that the BLM did not do so in the draft RMP/EIS. This river, which originates in the proposed Handies Peak Wilderness, possesses outstanding values -- visual, recreational, and geologic (notably the Slungullion Slide National Natural Landmark) -- which must be preserved.

The Society urges you to consider these comments and include our recommendations as part of the final RMP/EIS.

Sincerely,

Joanne Carter
Joanne Carter
Regional Associate

Responses to letter 57

June 12, 1991

Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 South Townsend Avenue
Montrose, Colorado 81401

57

Dear Mr. Bottomly:

This letter is to comment on the draft RMP/EIS for the Gunnison Resource Area. This draft does not do enough to protect this area's high scenic and ecological values. I have lived in Gunnison since May of 1982 and am witnessing the increased recreational uses of this land. In times of budget restraints etc. I understand it's hard to meet all necessary objectives, however these are PUBLIC lands, and public, recreational uses should take priority.

1 It seems that public use of these lands is what suffers. Mountain bike riders and hikers must adjust their outings to meet the ranchers grazing schedules. We need more trails to meet the recreational demands of the public. These trails need to be instigated NOW while these valued areas still exist.

2 I have the following suggestions for the plan:
3 -The entire Lake Fork of the Gunnison should be afforded Wild and Scenic designation.
4 -The Alpine Triangle, East Gunnison, Cabolla Creek and West Antelope Creek areas should be given ACEC status.
-Instigate sound grazing practices which protect and improve riparian habitat, control sediment loss and restore the rangeland to good condition. (If this is possible.)

Thank you for taking the time to read my comments. Enjoy your summer.

Sincerely,
Patricia Winslow
Patricia Winslow
415 County Road 20
Gunnison, Colorado 81230

1 through 4. See the responses to comments 4 of letter 12, and 1, 2, and 3 of letter 8, respectively.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES



United States Department of the Interior
 NATIONAL PARK SERVICE
 ROCKY MOUNTAIN REGIONAL OFFICE
 12793 W. Alameda Parkway
 P.O. Box 25287
 Denver, Colorado 80225-0287



58

IN REPLY REFER TO:

L7619 (RMR-PP)

JUN 13 1991

Memorandum

To: District Manager, Montrose District, Bureau of Land Management, Colorado
 Attention: Mr. Bill Bottolay

From: Acting Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Review of Draft Gunnison Resource Management Plan/Environmental Impact Statement (DES-91/0006)

The National Park Service (NPS) has reviewed the above-referenced document and offers the following comments.

Management of Bureau of Land Management (BLM) lands is of concern to the NPS because actions taken on these lands may impact units of the National Park System or other areas administered by the NPS. Two units, Black Canyon of the Gunnison National Monument and Curecanti National Recreation Area, could be impacted by activities proposed in this document. We also have concerns related to the Slunguillon Earthflow National Natural Landmark and the potential designation of Lake Fork of the Gunnison River as a wild and scenic river.

GENERAL COMMENTS

Mineral Resources

We have two primary mineral-related concerns with the document: (1) each of the alternatives presented in the document include an escalation in leasable mineral development (59 percent increase in the preferred alternative); and (2) the cumulative effects of leasing on Bureau of Land Management (BLM), Forest Service (FS) and NPS lands are determined to be "insignificant" without any supporting analysis.

1 Oil and gas leasing adjacent to NPS units is of growing concern to us in the Rocky Mountain Region. We recommend onsite meetings with BLM and FS managers where such development will occur in proximity to NPS units in order to ensure that NPS resource protection concerns are addressed early in the planning process. Such meetings should discuss the possibility of no surface occupancy stipulations adjacent to NPS units and assurances that NPS will be provided the opportunity to review all permit/lease applications and plans of operations where park lands might be impacted.



2 From a minerals perspective, the NPS could not support alternative C, which advocates an emphasis on commodity development and the revocation of all withdrawals.

Black Canyon of the Gunnison National Monument

These comments pertain to the following identified sections within the preferred alternative narrative (pages 3-102 to 3-105):

2 Soils and Water Resources. The recommendation for filing on water rights does not specify which water resources would be involved. We assume these are primary surface waters that would have minimum impact on the monument's reserved water right.

3 Special Status Plant and Animal Species and Habitat. We suggest using the Colorado Division of Wildlife or the U.S. Fish and Wildlife Service as the coordinating Agency to serve as liaison among the various land-managing Agencies (NPS, USFS, BLM, State of Colorado, etc.), as threatened and endangered species share many of these lands controlled by the various Agencies.

4 Wildlife Habitat Management. Bighorn sheep have also been identified in the Cimarron Creek area near Morrow Point Dam. Preliminary research indicates that these animals may migrate from the Gunnison Gorge through the Monument and we encourage further study of this species.

Curecanti National Recreation Area

5 We request that the proposed action in the final Environmental Impact Statement (EIS) consider the need for additional protection of the unique and outstanding natural resources on BLM lands surrounding Curecanti National Recreation Area. We request full protection for all proposed Areas of Critical Environmental Concern (ACEC); additional recognition of archeological resources from indiscriminate vehicle travel, road construction, and other disturbances; additional protection for bighorn sheep populations from domestic sheep grazing and disease; protection of water quality and quantity, both of which are high throughout most of the area; and protection of viewsheds seen from the recreation area through stringent use regulation and increased protection of riparian zones, aquatic habitat, and terrestrial habitat.

We commend the BLM for nominating the West Antelope ACEC, adjacent to the north boundary of the recreation area. We also commend you for your decision not to authorize grazing within allotment 6200 and for modifying grazing practices on allotment 6202.

6 Alternatives B, C, and E propose disposal of surface and subsurface tracts adjacent to and near the recreation area. We request that the NPS be advised of a tract-specific disposal when it is proposed and that we be given the opportunity to comment on the proposed disposal.

Wild and Scenic Rivers

The document identifies three segments of the Lake Fork of the Gunnison River as being analyzed for potential inclusion into the National Wild and Scenic River System: Section A (Sloan Lake-Wager Gulch), Segment B (Wager Gulch-Red Bridge Campground), and Segment C (Red Bridge Campground-Blue Mesa Reservoir). BLM found Segment A eligible but determined it to be unsuitable. BLM found Segments B and C to be ineligible for further study.

Responses to letter 58

1. Rather than escalating leasable minerals development, the various alternatives in the DRMP present circumstances in which oil and gas leasing would be precluded or stipulated on varying acreages in order to meet the different management objectives within each alternative. Using the acre figures on page S-2 in the DRMP, there would be a 10% increase in the area open to oil and gas leasing; there are no leases in the Planning Area, and the potential for the occurrence of oil and gas resources in the Planning Area is low or none. Stipulations recommended in the DRMP Preferred Alternative, and the PRMP would provide adequate protection for resources in the event of development.

The supporting analysis for the determination of insignificance is located in the description of the affected environment on pages 2-8 and 2-9. The geologic evidence and the history of exploration indicate the possibility of oil and gas development in this area is almost non-existent and therefore not significant.

2. The water sources that would be filed on for water rights have not been specifically identified. However, the comment is correct in the assumption that most, if not all, of the subject waters would be primary water sources such as springs and seeps that if consumptively used, would have a negligible impact on water in the Gunnison River flowing through the Black Canyon of the Gunnison National Monument.

3. The BLM would continue to cooperate with and share information with the referenced agencies regarding management of these species on public lands. If a central clearinghouse is desired for the purposes mentioned in the comment, the USF&WS would be the logical initiator for such an agreement.

4. Although bighorn sheep from the 1986 transplant in the Gunnison Gorge have migrated to Morrow Point, there aren't enough public lands in that area to justify a research effort by BLM alone. Most of our efforts would be aimed at locations that contain established populations that use large areas of public lands. The BLM would cooperate to the degree necessary for such research.

5. See the Management Unit prescription for units 4 through 9 in Chapter Four of the PRMP for the management that is recommended in the various ACECs. Most of the actions recommended in the comment are included in these prescriptions.

6. The NPS would be so advised, as would other adjacent land owners or managers.

7. The evaluation mentioned in the comment has been modified by the National Park Service to find the 0.8 miles of the stream inside the Curecanti NRA not eligible for inclusion into the system.

Please see Attachment 2 in Appendix I of the PRMP for information on other streams in the Planning Area that were evaluated.

8. This was an oversight. A change for page 2-32 of the DRMP is included in the PRMP in the section of Chapter Two titled "CHANGES TO THE TEXT OF THE DRMP".

9. There are no mineral leases in the Planning Area other than one coal lease (see page 2-8 in the DRMP). Unpatented and patented mining claim information is available in the BLM offices in Denver, Montrose, and Gunnison.

10. Thank you for the comment. The PRMP notes that NPS lands are withdrawn from mineral entry and location and that leasing of these lands is not permitted.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

11. Please see the response to comment 10 of your letter.
12. No portion of any stream in the Planning Area is recommended or proposed for designation into the Wild and Scenic Rivers System. Significant protection and intensive management exists for the eligible Segment A of The Lake Fork of The Gunnison River. Approximately 330 acres are within an existing protective withdrawal. Please refer to the section on Suitability Determination in Appendix I of the PRMP for more information on protection of the segment.
13. The land mentioned in the comment is located in unit E-9, a recommended ACEC (Dillon Pinnacles). The legal description for the tract is T. 4 W., R. 49 N., Sec. 2: SW 1/4 SW 1/4, as shown on BLM Master Title Plat. The intent of the recommendation is to set the stage for eventual relinquishment of the tract by the Bureau of Reclamation from the current withdrawal for the Curecanti Unit, in order to avoid any potential inundation. The tract is within a recommended ACEC, appears not to be necessary for operation of the reservoir, and possesses important scenic values.
14. The alternatives described in this document do not "open" lands to saleable minerals. Within each alternative, because of different proposals to manage other resources, certain areas are proposed where disposal of saleable mineral resources would be precluded. Unless otherwise precluded, the disposal of mineral materials would be permitted throughout the Planning Area. Impacts from mineral material disposal, Planning Area-wide, are not anticipated to be significant.
15. Without a definite scenario, quantifying potential water quality impacts would be impossible. If locatable mineral development were to be proposed, every attempt would be made to work with the proponent or claimant to reduce impacts as much as possible. Stipulations and mitigating measures would be required in surface-disturbing plans for mineral material disposal to protect water quality. Water quality monitoring would be required.
16. We assume the comment is referring to the Lake Fork potential ACEC (No. 7 in Table H-6, Appendix H of the PRMP). The area was considered during development of the various alternatives in the DRMP, but was not recommended for designation as an ACEC in the PRMP (or in some alternatives in the DRMP). In the judgement of BLM, the resources are adequately managed and protected by the recommendations in the prescription for units 1 and 15.
17. A list of tables and maps has been included in the Table of Contents in the PRMP. Maps showing mineral potential are available at BLM's Gunnison office. The map on page 1-1 is intended to serve as an overview map. The alternative maps also show most of the areas mentioned in the DRMP.

- 58
- 7 A recent evaluation by the NPS found the portion of Segment C within Curecanti National Recreation Area to be eligible for wild and scenic river designation because it is free-flowing and it provides outstandingly remarkable scenic, recreational, geologic, fish, wildlife, and historic values.
 - Also note that Section 5(4) of the Wild and Scenic Rivers Act states that "In all planning for the use and development of water and related land resources, consideration shall be given to potential national wild, scenic and recreational river areas, and all river basin and project plan reports submitted to the Congress shall consider and discuss any such potentials. The Secretary of the Interior and the Secretary of Agriculture shall make specific studies and investigations to determine which additional wild, scenic and recreational river areas within the United States shall be evaluated in planning reports by all Federal Agencies as potential alternative uses of the water and related land resources involved." It would be helpful if the final Resource Management Plan/EIS discussed whether or not other streams in the resource area are eligible as components of the National Wild and Scenic Rivers System.
 - National Natural Landmarks
 - 8 The Slungullion Earthflow National Natural Landmark (NML) is not identified in the "Affected Environment" section of the document but is identified in No. 12, Table H-2, on page H-7 in Appendix H. Protection of this excellent example of mass wasting is essential and we encourage you to consider the existence of this NML when proposing actions and assessing impacts for activities in the resource area. We have enclosed a map and narrative description of this NML.
 - SPECIFIC COMMENTS
 - 9 Page 1-4, Table 1-1. We suggest that you include columns for the numbers of unpatented and patented mining claims and mineral lease applications.
 - 10 Page 1-7. The document repeatedly discusses withdrawal and protection of Wilderness Study Areas (WSA) in the resource area. Since other withdrawals are mentioned, it would be fitting to emphasize that NPS-managed lands are categorically withdrawn from all forms of mineral-entry development.
 - 11 Page 1-7, last paragraph. This section is misleading on two points: (1) it implies that only NPS-managed National Recreation Areas are withdrawn from Federal mineral leasing when in fact all NPS units are withdrawn unless overridden by an individual unit's enabling legislation; and (2) it implies that Curecanti National Recreation Area is something other than an NPS unit, when in fact it is managed as an NPS unit under the Memorandum of Understanding with the Bureau of Reclamation. We recommend replacing the last paragraph with the following: "Most NPS units, including Curecanti National Recreation Area within the Gunnison Resource Area, are closed to Federal mineral leasing, unless such leasing is specifically authorized by Congress. In the three units currently open to Federal mineral leasing (Glen Canyon National Recreation Area, Whiskeytown National Recreation Area, and Lake Mead National Recreation Area), BLM must have the consent of the NPS Regional Director prior to issuing or renewing any leases."
 - 12 Page 3-112, paragraph 4. Alternative E states that the proposed wild and scenic river segment will be under standard mineral management practices until a decision is made. We recommend withdrawing this area from mineral development until a decision is made on the wild and scenic river designation.

58

 - 13 Page 3-121. We are not clear as to the parcel being considered and the intent of the paragraph on "Withdrawals and Classifications."
 - 14 Page 4-41, Alternative D Impacts Section. The document states that 579,309 acres of saleable minerals "would more than satisfy the current demand of 17,500 cubic yards annually and meet the anticipated future demand." It is unclear then, why the preferred alternative recommends 666,530 acres for saleable minerals. Prescribing the minimum required acres would decrease the stated impacts, including sedimentation in fishery streams, damage to riparian vegetation, chances of disturbing threatened and endangered species habitat, and degradation of recreation settings and experiences.
 - 15 Page 4-56. Heavy metal contamination of surface waters draining into Curecanti National Recreation Area could be significant. The discussion does not address this possibility nor recommend any long-term monitoring for the area.
 - 16 Page H-6, Table H-2, Appendix H. This table indicates that the NPS requested the withdrawal of the Lake Clark Fork unit for its scenic and historic values. This area is included in alternatives B and D, but has been omitted from alternative E. Aside from its scenic and historic values, this area may need protection as part of the watershed draining into Curecanti National Recreation Area. We recommend this area be included in the withdrawals proposed under the preferred alternative. The preferred alternative should also include the broader Alpine ACEC, which includes the Lake Clark Fork unit.
 - 17 Maps. We recommend including the following maps in the final EIS: (1) an overview map, locating areas referenced throughout the document; and (2) a map showing mineral development potential throughout the planning area.
 - Other. Including a list of tables, maps, and other illustrations in the table of contents would be very helpful for reviewers.

Michael D. Snyder
Michael D. Snyder

Enclosure

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES



E. D. Howard & Sons
 I - HEREFORDS
 2758 County Road 27 • Powderhorn, Colorado 81243
 (303) 641-0795

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June 13, 1991

Mr. Alan L. Kesterke, District Manager
 Montrose District
 Bureau of Land Management
 2505 South Townsend Avenue
 Montrose, Colorado 81401

Mr. Barry A. Tollefson, Area Manager
 Gunnison Basin Resource Area
 Bureau of Land Management
 216 North Colorado Street
 Gunnison, Colorado 81230

Mr. Bill Bottomly, RMP Team Leader
 Montrose District
 Bureau of Land Management
 2505 South Townsend Avenue
 Montrose, Colorado 81401

Re: Comments on Gunnison Resource Area
 Draft Resource Management Plan and
 Environmental Impact Statement

Gentlemen:

We have reviewed and are submitting our written comments on the Draft RMP/EIS for the Gunnison Resource Area for your consideration. E. D. Howard & Sons I - Ranch are third and fourth generation cattle ranchers which operate almost exclusively within the area covered by the Draft RMP/EIS. We run cattle in common with others on the Iola-Powderhorn Allotment #6107. The allotment has an existing AMP to which recent (1988) revisions have been drafted but apparently never finalized.

The preferred alternative of the Draft RMP/EIS proposes a major change in management policy to the detriment of livestock producers. Reasons for this change in policy should be addressed. Under the existing management practices reliance was placed on the Gunnison Basin Livestock Grazing EIS and Allotment Management Plans (AMP's).

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The Gunnison Basin Livestock Grazing EIS included plans for range improvement which would increase available AUMs significantly. While actual livestock use has been below levels anticipated by this EIS, the proposed vegetation treatment and facility construction itemized in the EIS has not been implemented. These issues should be recognized and reasons for the change in management from that which was contemplated by the Gunnison Basin Livestock Grazing EIS should be addressed. Specifically, we are concerned by the fact that management policy has been and can be changed before full implementation of the existing EIS.

We strongly support an AMP driven range management plan. Unfortunately, most of the allotments in the planning area do not have AMPs or the AMPs are not considered to be current. The failure to develop or revise AMPs should not be impetus for reversal of existing management policy. The changes and adjustments envisioned by the Draft RMP/EIS could place livestock producers in a situation where their opportunity to develop or revise AMP's to respond to and incorporate the management policies of the draft RMP/EIS would be placed on hold indefinitely. Therefore, a major change in policy such as is proposed should include some reasonable and definite planning criteria for implementation as well as providing for adequate methods and time frames for livestock producers to develop and revise AMPs while minimizing the potential negative impacts.

We strongly oppose what appears to be the unquestioned acceptance of the Colorado Division of Wildlife's long range herd goals. Nowhere is there stated a similar goal of reaching full active authorization of all livestock AUMs under the Taylor Grazing Act of 1934. Wildlife numbers should be based on sustainable critical winter habitat with due consideration given to existing authorized uses including the above authorized livestock AUMs. Much of the critical winter habitat is also critical for early spring livestock grazing. In addition, private lands should not be considered as sustainable habitat without the consent of the owner. We, as private land holders in critical winter habitat areas, do not approve of our private lands being included as critical winter habitat. The BLM should keep these factors in mind and develop a specific inventory of critical winter habitat and sustainable populations to which the CDOW would be required to comply.

It is unclear how the 4-inch minimum stubble height in proposed management areas E14 and E15 is to be implemented in the current rest-rotation system. The requirement is not feasible without serious detrimental effects on livestock grazing. This requirement should either be abandoned leaving the rest rotation system in place as is or be expanded to include specific detailed plans for water and vegetation improvements that would mitigate the loss of all active and inactive AUMs authorized under the Taylor

Responses to letter 59

1. See the responses to comments 3, 4, 5, and 6 of letter 50.
2. See the response to comments 5 and 6 of letter 50.
3. See the response to comments 3 and 4 of letter 50.
4. Please refer to the response to comments 11, 15, 16, and 20 of letter 38, regarding wildlife numbers, carrying capacities, and the relationship between CDOW and BLM regarding requests for reductions in population numbers. Also, please refer to the response to comment 13 of letter 50 for information regarding the manner in which elk population estimates are calculated during the year. Since 1983 the CDOW has been trying to hold elk numbers down to their long range herd goal of 9,000.

Recommendations were made in the DRMP to hold game populations within habitat carrying capacity on public lands (please see Table A-3, page A-1, in the DRMP). As a result of our monitoring studies, our primary concerns regarding management of wildlife habitat are with the long range herd goals for deer. In Table A-3, page A-1, in the DRMP, and in Table A-4, in Appendix A in the PRMP, BLM recommends lower interim herd goals for deer until shrub production and vigor increases.

5. Please see the response to comment 18 of letter 50, and 19 of letter 35.
6. Our inventories are specifically tied to crucial winter habitat on public lands. Please also see the response to comment 15 of letter 50.
7. Please refer to the Standard Management for Livestock Grazing Management in the PRMP for language that has been modified and reworded to clarify recommendations, including minimum stubble heights. Any additional forage available for livestock as a result of range improvements or treatments would be allocated according to the management objectives and regulations cited in that section of the PRMP. Allocation of this forage could be considered as a means to avoid suspended use, or possibly to activate suspended use, after meeting the basic soil and watershed needs defined in the Montrose District Soil Erosion Monitoring Guidelines (see Appendix N).
8. Application of range readiness (refer to Appendix B, DRMP and PRMP for criteria) has been clarified and expanded upon. Range readiness criteria would be used when earlier turnout dates than authorized are requested, and in extenuating circumstances, such as drought situations or serious wildfire. Please see the subheadings "Grazing Administration" and "Monitoring and Range Readiness" in the Livestock Grazing Management section of Standard Management in the PRMP for more information.

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7 Grazing Act of 1934 and implemented within a time period which would not cause undue hardship to the livestock operator.

8 We recommend that turnout dates should be an agreement between the BLM and the permittees on allotment by allotment basis using available data for the particular allotment and not what appears to be an adoption of the USFS criteria.

The preferred alternative is not acceptable in the present form and as such we do not support the draft RMP/EIS.

We have reviewed and endorsed the comments provided by the Gunnison County Stockgrowers Association.

We thank you for the opportunity to comment on the Draft RMP/EIS.

Sincerely,



Edward Howard

EH:mb

Responses to letter 60

UNITED STATES DEPARTMENT OF AGRICULTURE	Soil Conservation Service	216 N. Colorado Gunnison, CO 81230 303-641-0494
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June 7, 1991

Bill Bottomly
RMP Team Leader
Bureau of Land Management
2505 South Townsend Ave.
Montrose, CO 81401

60

Dear Bill,

RE: COMMENTS ON THE GUNNISON RESOURCE AREA MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT.

My comments are dealing with rangeland management and the lack of a active management strategy and more of a wait and see attitude, the mention of livestock as a problem rather than a tool seems to be an easy way to a solution. There are also a few contradictions between the plan and current happenings within the resource area. In the next paragraphs I hope to address my concerns with your management plan.

1 Livestock seem to be blamed for most of the resource problems on the BLM in one way or another. On pages 2-13 and 2-17 there is the mention of riparian damage by livestock, yet there is no mention of elk use in those same riparian bottoms before the livestock move into those areas in the spring and just before spring runoff occurs. This spring I looked at a elk damage problem on private lands which showed how elk can severely overgraze new spring growth before runoff begins and leave areas that had proper grass stubble in worst shape than the cattle had left it the year before.

2 On page 2-11, Table 2-7 shows me a lack of grass or forb vegetative cover over the three main range sites that cover the resource area, and this is where most of the riparian problems originate. There is such a dense sagebrush cover over the resource area that it will never recover without an active brush management program. In the past the BLM has done some burning which has not work because the burned areas are to small and they tend to concentrate the livestock because it is the only place there is any forage. I would like to see an EIS developed so the resource area could do some chemical brush control which would leave old dead sagebrush in place to keep some of the grazing pressure down. There would also be the need for larger treatments of sagebrush to cut down on the animal concentration.

1. In the DRMP, Page 3-105, the Livestock Grazing Management section contains a reference to utilizing grazing as a management tool to enhance riparian areas. Please refer to the statement, "Development of AMPs or CRMAs would consider livestock grazing management as a tool to improve or maintain the conditions of the riparian system in the planning area." The current management of livestock is resulting in impacts associated with overuse of portions of the rangeland, most notably riparian areas and previously treated areas.

Please also refer to the response to comment 41 of letter 38 for a reply to the comment regarding riparian damage.

2. Of the methods that are available to treat sagebrush, chemical control, under the proper usage, would be best in some circumstances, not only for the reasons stated in the comment, but it also permits better control on application.

3. Studies in Colorado, Montana, Idaho, Nevada have been conducted that show impacts and changes in grouse distribution or populations following sagebrush removal. In the Gunnison Valley, the Tomichi Dome vegetation project is a good example of how treatments have effected grouse.

4. Monitoring studies on public land winter range have demonstrated that shrubs appear to make up the bulk of winter forage for elk and deer. Grasses are used mostly in the spring, but to a much less degree. Sage grouse do not have a well developed gizzard, which prevents them from using grass seed like other birds, and as a result the species is heavily dependent on the leaves of sagebrush and the herbaceous vegetation in riparian areas.

5. Please refer to the response to comment 34 of letter 38.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

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3 On page 2-26 it states that there is a theory regarding the effects of sagebrush treatments on the decline of sage grouse. I do not feel this should be included in this RMP unless you have a proven study. Much of the brush control work that has been done over the years seems to attract the sage grouse when they are feeding their young and it also attracts the deer and elk off of the BLM rangeland down on to the private lands where there is better condition range. On page 2-15 it also mentions that deer, elk, sage grouse and many other birds and wildlife are dependent on sagebrush. Dependent is a very strong word, especially when studies show that sage grouse utilize open areas for feeding and breeding, and elk are probably more of a grazing animal than a browsing animal, and deer only utilize the sagebrush during critical winters when most of the other vegetation is covered with snow. Much of the wildlife species spend the majority of their time on private lands and US Forest Service lands because that is where all the active vegetative management is occurring, I would like to see the BLM take a active management role rather than the passive one this RMP addresses. On page 5-12 there is more evidence of a lack of progressive thinking by restriction of land treatments on over 200,000 acres of land, that with the proper treatments could only benefit all resource users.

6 On pages 5-7 and 3-104 there is mention that there will be no surface disturbance allowed within 1/4 mile of all sage grouse lake, between April 1 and May 31. Yet the BLM is allowing and helping with some of the cost for the Colorado State Division of Wildlife to install a parking lot for a Watchable Wildlife Area near a lake in Houston Gulch. It seems to me that this is counter to your plans to keep from disturbing the sage grouse during mating. One of the biggest reasons for the decline in the sage grouse is the influx of people and development into areas that were once inhabited by the sage grouse.

7 The 4" minimum stubble height in riparian areas is mentioned throughout the RMP, yet there is the allowance for 40 - 60 X use in riparian areas because of their resilience. Bluegrass which is the predominant grass in riparian areas when grazed at 40 - 60 X will usually be grazed lower than 4". In the Gunnison Valley with a growing season of 67 days at lower elevations and the limited precipitation, it is very likely that grazing of bluegrass down to a 1" stubble height is a 50 X grazing level. Our standards and specifications for pasture and hayland management state that the maintenance grazing level for bluegrass is 2", and in most cases this is with irrigation and fertilization. It also allows for closer grazing where there is early spring grazing followed by rest for the remainder of the growing season. I feel that there should be more of a effort placed on brush control and working with the livestock producer to achieve better riparian management.

6. The BLM is also concerned about disturbance to sage grouse by human activity, and we hope to inform the public of these concerns through interpretation and by educating the general public about the wildlife and habitat needs on public lands. The watchable wildlife area will be signed and patrolled to encourage people to remain in their vehicles in order to prevent additional disturbance to the birds. If for some reason this does not work, then facilities would be removed.
7. Please see the revised and reworded Livestock Grazing Management section of STANDARD MANAGEMENT in Chapter Four, for information on minimum stubble heights, including how these recommended actions would be implemented.

The proposed management for riparian areas in the Preferred Alternative in the DRMP, and in the PRMP, is expected to, in the short term, increase the vigor, production and height of riparian grasses. In the mid-to-long term, an increase in grasses other than bluegrass would occur. Other grasses, both native and naturalized, such as brome, timothy and wheat grasses, produce significantly more forage than bluegrass, but require a somewhat higher stubble height to remain productive.

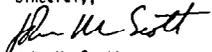
8. Several studies document the problems that occur to bighorn sheep when domestic sheep are grazed in the same area. In addition to the studies referenced in the response to comment 38 of letter 50, we also have several additional studies conducted from 1982 to 1991 that were published in The Journal of American Veterinary Medical Association, Journal of Wildlife Diseases, that show the problem when domestic livestock are intermingled with bighorn sheep. Beside disease related problems, other areas of concern when managing for bighorn and domestic livestock occur in the utilization of forage, wild sheep and habitat displacement, and interbreeding.

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8 There is also much mention of domestic livestock passing on diseases to the bighorn sheep population, and there is only one publication that is used to get this information. In discussion with the veterinarians at Town and Country Vet Clinic in Gunnison, they feel that all livestock, wildlife and even humans carry the same diseases and that it is only when the animals are put under undue stress that these organisms take advantage of the situation and will kill the animal. This is another undue blame on livestock when possibly there needs to be some further research on the effects of over population and the continued trapping of these animals.

I feel that the above mentioned items need some further research before they are put in concrete in this RMP, and some of the theories need to be left out until they are proven. This document needs to reflect the multiple use concept the BLM operates under. All users of the BLM lands would benefit from an active resource management plan where the objective is the benefit of the environment as a whole.

Sincerely,


John M. Scott
District Conservationist

cc: Barry Tollefson, Area Manager

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES



61

1860 Lincoln Street, Suite 404 - Denver, Colorado 80295
303/860-0399

June 12, 1991

Mr. Bill Bottomly
RMP Team Leader
Bureau of Land Management
2502 S. Townsend Avenue
Montrose, CO 81401

Dear Mr. Bottomly:

On behalf of the Rocky Mountain Oil & Gas Association (RMOGA) and its division, the Colorado Petroleum Association (CPA), following are comments on the Gunnison Resource Management Plan (RMP) and Draft Environmental Impact Statement (DEIS). RMOGA is a trade association with hundreds of members who account for more than 90% of the oil and gas exploration, production and transportation activities in the Rocky Mountain West. As such, RMOGA is vitally interested in how the BLM intends to manage its lands in terms of oil and gas resources.

RMOGA strongly supports the less restrictive approach toward oil and gas leasing the BLM proposes in the Preferred Alternative. In accordance with the Supplemental Program Guidance for Fluid Minerals (SPG), the BLM is required to utilize the least restrictive stipulations available to adequately safeguard other resource values which require protection. Through this new planning analysis, the BLM determined that an 80% decrease in the use of seasonal stipulations is appropriate in the planning area, but that new designation of no surface occupancy are essential on 35,605 acres to protect important wildlife, scenic, and recreational values. Moreover, BLM determined that 44% more land in the planning area (267,073 acres) should be leased with standard stipulations. Even though the planning area has very little potential for oil and gas resource development, we applaud BLM's decision to make management changes it believes are necessary, even if they may be unpopular with certain segments of the public.

In general, the BLM did an excellent job of putting together the DEIS. It is easy to read and follow. However, there are a few elements of the DEIS which we believe could be improved.

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Mr. Bill Bottomly
RMP Team Leader
Bureau of Land Management

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Responses to letter 61

1. General location maps and a table showing where oil and gas stipulations would be applied are included in Appendix K in the PRMP.
2. The referenced discussion on impacts in the DRMP has been changed to more accurately address oil and gas impacts to soils and water resources. Please refer to the change to page 4-56 of the text of the DRMP, in Chapter Three of the PRMP. The PRMP also reflects the changes, where applicable.
3. See the discussion of environmental consequences in the PRMP.
- 4 and 5. Neither the oil and gas development procedures nor the typical oil and gas operating guidelines are included in the appendix of the DRMP or PRMP. The reasonable and foreseeable development scenario of one or two wells possibly being developed over the life of the plan does not warrant the publication of this somewhat voluminous information.
6. The seasonal stipulation referenced in the comment is not included in the PRMP, as a result of internal review. The winter ranges referenced occur on about 34,500 acres in unit E-7 in the Preferred Alternative, and are used by deer and approximately 3,000-4,000 elk. Winters in the area of concern in the Planning Area can be very harsh because of the heavy snow and extremely cold temperatures. Most of the winter ranges on the subject public lands are confined, and consist of open sagebrush covered hillsides, with very little thermal or security cover. Under these kinds of conditions, game animals are vulnerable to the slightest change in their daily routine. The potential disturbance caused from road construction, vehicular traffic, and related activities during the winter would disrupt traditional big game use patterns for several miles around the drilling operation. Human disturbance upsets the energy conservation mechanism of the animals, and this excessive energy expenditure in winter could increase mortality and reduce the ability of does and cow elk to produce young in the spring. Elk and deer stay close to their food source and human disturbance could force them into areas without food, or into deeper snow, or onto private lands where off-site impacts could occur to forage there.

1 It would be extremely helpful if the BLM would include maps in the Final EIS detailing where special stipulations will be applied. We realize that areas subject to special stipulations are addressed in the Management Unit discussions in Chapter 3; nevertheless, both industry and the public in general would have a better understanding of the plan if stipulation maps are provided.

2 Page 4-56 of the DEIS indicates that seasonal or no surface occupancy stipulations would lessen potential impacts if development occurs. Seasonal stipulations do not normally apply to production. In fact, Appendix K specifies that seasonal limitations do not apply to operation and maintenance of producing wells. Moreover, it is unclear as to how seasonal restrictions could prevent accidental fluid discharges, such as produced water during drilling operations, from impacting soil and water resources. However, it must be made clear that other mitigation measures and operating standards are used to protect sensitive resource values during oil and gas exploration and production activities. According to the National Environmental Policy Act (NEPA), mitigation measures should be addressed in Chapter 4 of the EIS, Environmental Consequences. More specific disclosure of operating standards and guidelines along with additional mitigation measures could be included in an appendix to the Final EIS.

3 Chapter 4 discusses the impacts of resource uses on specific resource values, such as riparian areas, livestock grazing, and scenic values, to name a few. Yet, in few instances are oil and gas resources discussed. We recognize that little or no impact is expected from oil and gas activities; however, in the interest of conducting adequate NEPA analysis, it is important that impacts associated with oil and gas resources, along with reasonable mitigation measures, be fully disclosed in the EIS.

5 In keeping with the requirements outlined in the SPG, we believe the BLM should also add an appendix to the Final EIS which includes a discussion of the various stages of oil and gas activity, from leasing to abandonment and reclamation. We recommend that the discussion contained in the recently adopted Oil and Gas Leasing Amendment prepared for five resource areas in Colorado be incorporated into the Gunnison RMP. Full public disclosure of typical oil and gas operations will provide a foundation for public understanding of oil and gas activities.

6 The five month seasonal restriction in critical mule deer winter range seems to be excessive. We have found nothing in the document to support the general assumption that oil and gas activities are harmful to mule deer. Furthermore, we are unaware of any scientific studies which support such a conclusion. On the contrary, deer herds would probably be more adversely impacted by poor habitat and/or severe winter conditions than by oil and gas activities.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

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Mr. Bill Bottomly
RMP Team Leader
Bureau of Land Management

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6 According to Table 2-16, in two out of the three Gunnison Management Units which contain deer habitat, deer population currently exceeds the herd objectives established by the Colorado Division of Wildlife. The same is true for elk. We recognize that seasonal stipulations can be effective in providing needed protection to wildlife during harsh winter conditions. However, we believe that less restrictive measures would normally suffice. We recommend that the BLM reevaluate its stipulation policy on critical winter range areas to determine whether less restrictive stipulations would still provide for adequate protection of the resource.

We appreciate this opportunity to provide you with our views and comments. If you have any questions or would like to discuss our comments in greater detail, please contact me.

Sincerely,

Claire M. Moseley
Manager, Federal Land Planning

CMM:cw

c.c. Frank Salwewicz, Deputy State Director, Mineral Resources

Responses to letter 62

1. See the responses to comments 1 and 2 of letter 8, 4 and 2 of letter 12, and 3 of 8, respectively.

Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 South Townsend Avenue
Montrose, CO 81401

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Dear Mr Bottomly,

I am writing to you regarding the BLM's recently released draft Resource Management Plan and EIS for the Gunnison Resource Area in Hinsdale, Gunnison, Saguache, Montrose and Ouray Counties. The Draft Plan as it is does not include some very important aspects that would protect the ecological integrity and beauty of the regions discussed. Please take into consideration my following suggestions:

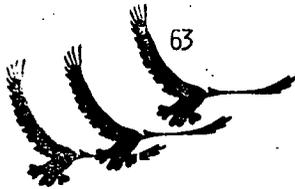
- 1 ALL of the LAKE FORK of the Gunnison from its origin at Sloan Lake in the Handies Peak proposed wilderness to Blue Mesa Reservoir deserves Wild and Scenic protection.
- 2 Please include the following areas in the official Areas of Critical Concern: the Alpine Triangle, the East Gunnison, Cebolla Creek, and West Antelope Creek.
- 3 Please construct more single track trails outside of proposed wilderness areas to accommodate increased hiking and mountain bicycling demands in the area. Please insure that motorcycles and jeeps be restricted to existing trails at all times.
- 4 Please institute grazing management practices that protect and improve riparian habitat, control sediment loss, and restore the rangeland to good condition.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 63

HIGH COUNTRY CITIZENS' ALLIANCE

June 12, 1991



Comments on the BLM's GUNNISON RESOURCE AREA Draft Resource Management Plan and Environmental Impact Statement by the High Country Citizens' Alliance

General Comments

The High Country Citizens' Alliance applauds the BLM Gunnison Resource area for its careful attempt to improve resource management in this basin. Unlike the 1989 Draft Timber Amendment for the Gunnison National Forest — the last major EIS we analyzed — the RMP includes a full range of alternative and distinct management strategies. We especially like your attempt to improve conditions of riparian areas.

Recreation Management

1. Off-road vehicles

The most glaring deficiency in the document is its poor analysis of the environmental impacts of off-road vehicles, especially when those vehicles travel off of designated routes.

We support the Preferred Alternative's intention to close 71 miles of riparian zone and to limit OHV's to designated routes year-long on 92,927 acres (pg. 4-59). However, this is not mapped. Map F-9 even seems to contradict this, for it maps no riparian corridors as limited, and all seasonal limits it portrays are only during winter. In contrast, Map F-7 for Alternative D Limited Areas shows many riparian corridors. Yet Alternative D's verbal description indicates a limitation of just 6,844 acres, far less than it's limited area (p. 4-43). Also, how can we compare it's "71 miles" with D's "1,500 acres" of closed lands?

HCCA supports the more careful approach exhibited on Map F-7. BLM is clearly hoping to improve riparian zones. Without the protections proposed in Alternative D, your other efforts, such as limiting livestock grazing, may be pointless. If the RMP is to allow unrestrained motorized use in riparian areas, BLM must justify this. There is no explanation presented in the draft to explain this.

Unfortunately, the RMP would in all alternatives leave all upland areas open to off-route travel. This ignores the many, many cases of environmental damage caused by off-road-vehicles on BLM lands throughout the West. And lands such as these are particularly susceptible to the ORV impacts. By traveling off designated routes, ORV riders can frighten or harass livestock and wildlife, erode soil, and damage vegetation. The RMP makes no mention of the environmental consequences of opening lands to unrestrained ORVs, a severe fault.

P.O. BOX 1066, CRESTED BUTTE, COLORADO 81224. 303/349-7104

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We accept the continued use of ORVs on most designated routes, outside of areas closed in Alternative D. We suggest that BLM, instead of opening all terrain, instead open and designate additional singletrack trails and jeep roads. Take some of the non-system trails and designate them. Close other non-system trails.

The RMP needs a more thorough travel management analysis.

2. Recreation facilities

a. Trails

We have just suggested the designation of additional travel routes as an alternative to unrestricted, open travel. We also suggest the construction of additional trails. This will be a boon to mountain bicyclists. This burgeoning sport needs more non-wilderness trail facilities. (In general, mountain bicyclists rarely ride off-trail because they have insufficient power to do so on most types of terrain.) Gunnison residents also need more trails within riding distance of their homes. The Gunnison Basin BLM lands offer excellent opportunities for both needs. Already, the Sage in the Sage area provides thousands of Recreation Visitor Days for cyclists. This could be easily expanded.

BLM should work closely with mountain bike and motorcycle user groups to expand these trail opportunities. BLM should hire a trails coordinator, who would then solicit and organize trail building and trail patrolling volunteers. This is one place where US Forest Service is way ahead of the Gunnison Basin BLM. We suggest that on this one you should follow their lead.

b. Campgrounds

HCCA supports your proposed recreation facility developments. With regard to the potential Sage River facility, the preferred alternative would only "consider" its development. We feel this small tract needs more certain attention. Very many people use it during the warmer months. The vegetation is declining and the soil compacting. There is no evidence that the old trees are regenerating.

However, this tract should not become a running-water, fee facility. We suggest that BLM should use subtle methods to guide vehicles to stay on a definite pathway. You might install picnic tables. You definitely should install a pit toilet. This should be located on the side of the hill, so that its vault does not reach into the river's water table. The toilet should use a new design that eliminates odors — no cross vents, but instead a small vent into the cabin and a large diameter, tall vent from the vault to the outside.

Timber management

The RMP states, "Reforestation would be conducted as funds become available." (5-106) This is unsatisfactory. BLM is most likely losing money on its timber program. You should abandon the money-losing commercial sales and devote the funds to the noble, critical goal of Planetary Restoration. We have decimated too many ecosystems on Earth. We cannot continue this destructive pattern. We must devote our energies to constructive projects that will restore our damaged environments back to their productive capacities. In the long run, this effort will result in more, higher quality trees for human use, and thus more income and jobs. There is no excuse for continuing indiscriminate commercial timber cutting on Gunnison Resource Area BLM lands!

1. We agree that the wording that describes impacts to riparian zones from proposed OHV management in Alt D and Alt E is inconsistent regarding units of measure. In actuality, there are only a few differences between OHV designations in Alt D and Alt E. Pages S-14 and S-15 in the DRMP summarize the acreage in each OHV designation. The 71 miles of riparian areas referenced on page 4-59 of the DRMP that would be closed to motor vehicles is not a new designation. It is the amount of riparian zones contained within closed areas such as the Powderhorn Primitive Area. These closed areas are depicted on map F-9 in the DRMP. The riparian corridors are not highlighted. The approximate acres of riparian areas affected by limited and closed areas are included in the discussion of impacts to riparian areas from OHV designations in the PRMP, Chapter Five.
2. Our monitoring of riparian areas that are open to OHV use has identified very few instances where damage has occurred. If problems do arise in the future, on public lands administered by BLM, this agency has the authority to implement temporary and immediate emergency closures. These, in turn, could justify permanent restrictions or elimination of OHV use. Permanent changes could only occur through a plan amendment, however.

As analyzed in the impact analysis of Alternative A (Current Management) in Chapter Four of the DRMP, about 373,916 acres of public lands are now open to OHV use. The DRMP also analyzes the impacts of OHV designations in each of the other alternatives. Historic and current OHV designations in the Planning Area have not created significant impacts, and recommended designations in the PRMP are not expected to create significant impacts during the life of the plan (15-20 years)

3. Please see the response to comment 2 of letter 12. In addition, the issue of open vs. limited designations is one we have wrestled with for a long time. Most of the resource area can remain open to motorized recreation because these areas generally receive light use, most people tend to stay on the roads, the ecosystems are not overly fragile, and topography tends to naturally restrict vehicular traffic. Limited designations, such as designated roads only, are applied to areas that get heavier use or places where the ecosystems are more fragile.

The more thorough travel management plan referenced exists as Gunnison Basin Resource Area OHV Plan and was written in 1981 and amended in 1984. Please note on page 1-11 of the DRMP that this document is referenced as valid existing management. Our goal in the RMP is not to rewrite this OHV plan but fine tune it to accommodate management objectives of the Preferred Alternative and the PRMP.

- 4 and 5. The Resource Area has, in the past, worked with various interest groups such as the Colorado Trail Foundation, the West Elk Road Club and the Colorado Mountain Club, whose volunteers have helped us build and maintain trails. We would continue to do so in the future. We would welcome the opportunity to work with any organized mountain bike or motorcycle club. It's been our experience that most of our users travel some distance to use Gunnison Resource Area public lands.

Many of our non-wilderness areas have networks of roads, two tracks and trails that are appropriate for use by mountain bikes. Most of these routes receive little vehicle use, cover a wide variety of terrain, and are generally underutilized by the recreating public. Because of staffing and other constraints, we would rather inform the public of the many existing opportunities on public lands.

Please also refer to the response to comment 4, letter 12.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Water management

1. Instream flow

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HCCA applauds the BLM's intention to pursue instream flows on 113 miles of fishery streams. [3-105] We wonder how you intend to do this. Does this mean spending money to acquire private water rights, and then donating these rights to the Colorado Water Conservation Board? Or does BLM intend to go to court and claim a federal water right? It certainly would not be a "reserved" right, for BLM lands by definition are not reservations. With the absence of a stated plan on how to accomplish this instream flow goal, HCCA must doubt the seriousness of the BLM.

2. Wildcat Creek

HCCA applauds the BLM's existing and planned management of the Wildcat Creek drainage above Crested Butte. The exclusion of livestock from this municipal drinking watershed is important. The US Forest Service should do the same!

3. Lake Fork Wild & Scenic

BLM should not so quickly dismiss suitability of the Lake Fork as a Wild and Scenic River. We disagree with the statement on page I-10 that the outstanding values of the upper segment "are not river dependent." The Alpine Triangle SRMA has many outstanding values which are intimately connected to the river. What are Colorado's mountains without Colorado's rivers? They are inseparable and co-dependent. If you really want to protect these values, you must protect the river. The RMP contains insufficient evidence that the SRMA will accomplish this. The headwaters above Lake San Cristobal will easily qualify for Scenic or Recreational status. None of this river should be subjected to any more dams. Wild and Scenic River designation is the only way to accomplish this.

If BLM insists on a non-suitable recommendation, you should at least beef up the SRMA provisions. Include the Lake Fork as a critical, major feature; provide that it is withdrawn from additional water diversion structures; insist that projects along its banks are carefully controlled to eliminate aesthetic impacts, soil erosion, and vegetative disturbance.

Wildlife

The plan will consider introduction of moose into the Powderhorn Primitive Area. HCCA is uncertain about this because the history is uncertain. Did moose live in Colorado prior to White Man? If so, then this introduction may be appropriate. If not, then it is probably inappropriate.

We support inclusion of this "consider" provision in the plan. We would expect the EA to answer the history and science questions, with full public involvement.

We support strict land management provisions to maintain the populations of the Uncompagure Primitary Butterfly. This may include restrictions on recreation in the Wilderness Study Areas south of Lake City. Wilderness exists for much more than recreation!

Riparian Zones

We applaud the BLM's apparent intention to significantly improve its riparian zone management. Your plan looks good.

With regard to timber, Alternative E would allow timber harvests if riparian and wildlife values are

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improved, whereas D would entirely prohibit logging in riparian zones. If you are serious about improving this critical ecosystem, why take this half-way measure? What evidence can you show that logging will ever improve a riparian zone?

We support the provision to modify or relocate water sources and roads in riparian areas where these are harming the ecosystem.

Visual management

We are alarmed that the RMP would allow well over a third of the lands to be degraded to VRM Class IV — "major modifications of the characteristic landscape...[management] activities may dominate the landscape and be the major focus of viewer attention [516 and Glossary p.9]

We must remind BLM that tourism and recreation are by far the primary economic livelihood in the Gunnison Basin. Tourism and recreation here are strongly tied to our natural-appearing landscape. What destruction would cause this severe landscape degradation? Where would it occur? Why would it occur, given the mandate of BLM to support local economies?

HCCA supports Alternative D's Visual Resource Management, which places a majority of the lands in VRM Class II and III, some in Class I, and very little in Class IV. We must remind you of your legal obligation to protect resources (including visual resources) and not merely to preside over their demise.

Livestock grazing and forage

1. Socioeconomic Impacts

The RMP insufficiently addresses the economic contributions, history, and prospects of the livestock industry, and of that industry's dependence on these BLM lands. The RMP should more carefully discuss this. The RMP should also compare the economic contribution of grazing on BLM lands with the economic contributions of other uses and resources.

2. Range Condition

HCCA is quite concerned with the very large amount of Gunnison Basin BLM land in only fair and poor condition. Only one-sixth of the 307,000 suitable grazing acres is in good condition. The RMP indicates BLM's intentions to improve this situation. However, these intentions seem to rely on a "business as usual" approach. For example, you would limit total forage utilization to the "moderate level, or 40-60% of the current year's growth", and you would require a minimum stubble height of 2.5" or 4". How does this differ from the past decade or two of management? Why will this lead to improvements? How will you spend money to correct the situation?

The RMP indicates that only 28 of the 146 allotments have completed Allotment Management Plans, and the plan is to create only "one or two" more AMPs each year. At the 2/year rate, it will take 59 years before the AMPs are completed! This probably violates the provisions of the 1980 Gunnison Basin Grazing EIS.

Does the RMP replace the plans put forth in the 1980 plan? If so, does this represent a retrenchment of efforts to improve the range, or an advance?

Your willingness to require minimum stubble heights may be a good idea; 2.5" is probably too small. This requirement should be flexible to some extent, because BLM should be considering alternative grazing management schemes. The work of Allan Savory has shown that intensive

6. The proposed campground development at Slate River is being considered in the DRMP because, at this time, other higher priorities and fiscal realities dictate that emphasis be placed elsewhere. The BLM recognizes the popularity of these sites and the opportunity to improve management and reduce impacts. When BLM begins the examination of the land at the site-planning stages, we would consider the suggestions in the comment when determining what, if any, facilities and improvements would be proposed.

7. See the response to comment 2 of letter 24 regarding reforestation. The Gunnison Resource Area receives payments in excess of the actual costs of timber sales that occur on BLM managed lands. These sales have been conducted in accordance with applicable laws, regulations, and approved land use plans.

8. The BLM plans to pursue instream flows on streams containing fisheries using the legal framework established by the state of Colorado. Colorado Senate Bill 97 allows appropriation of water by the state of Colorado to protect the natural environment (i.e., fisheries). In 1986, Senate Bill 97 was amended to provide that the Colorado Water Conservation Board request instream flow recommendations from agencies within the United States Departments of Agriculture and the Interior.

9. The referenced text in the DRMP, Appendix I, page I-10, has been changed. Please refer to page I-10 in Appendix I of the PRMP. The intended meaning BLM is attempting to convey is that the scenic values in Segment A of the river would continue to be well protected with the existing management authorities, and therefore, this segment would not make a worthy addition to the National Wild and Scenic Rivers System. Rivers play an important role in any Rocky Mountain ecosystem. In our suitability analysis of segment A, we made two major points that still seem accurate. First, since scenery was the only "outstandingly remarkable" feature that qualified this river for eligibility we evaluated whether it was the river that formed the basis for scenic quality. We decided that it was the steep topography of mountains and valleys that contributed most to outstanding scenic values and while the river played a role in scenic quality it is still a minor role. Secondly, existing management provides protection for this river corridor, and Wild and Scenic status would be a redundant and unnecessary protection measure. Existing protection measures include the SRMA, WSA status for part of the corridor, the Alpine Loop National Back Country Byway designation, the Loop Road Scenic Withdrawal (which, among other things, withdraws the corridor from mineral entry), and the State of Colorado's instream flow right. Please also see the response to comment 8 of letter 72.

10. According to discussions with the CDOW, moose did occur in Colorado but were limited to the northern part of the state where they moved back and forth between Wyoming and Colorado. Please refer to the response to comment 25 of letter 38. At this time the Powderhorn Primitive Area is a Wilderness Study Area and has been recommended to Congress for wilderness. If designated as wilderness, BLM would not consider the introduction of moose into the area. Moose could be considered for introduction in the event that Congress acts upon and does not designate the area as wilderness.

11. Timber harvesting, if permitted in riparian areas, would be required to be carefully planned to consider both wildlife and riparian values. For example, if conifers were thinned adjacent to a riparian area to stimulate aspen growth, food and dam material would be available to beavers, an animal well known for its ability to help restore degraded riparian areas. The amount of suitable commercial timber expected to be harvested in riparian areas is minimal.

12. The VRM Class objectives outlined in the Preferred Alternative, DRMP, are not a sure indicator that visual resources on those lands would degrade to that level. The importance of scenery to tourism

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17 grazing, followed by a good, long rest, can yield superior results, in some cases. The BLM should open its collective mind to this possibility, and to other new management ideas. However, the Savory scheme requires a high degree of labor, and perhaps more capital. We wonder if the grazing permittees are willing to put in that kind of effort, for it will cost more money. It may also yield more beef, so it is at least worth considering.

18 3. Wildlife/cattle conflict
 We feel concerned about the animosity ranchers are developing toward the elk and deer which consume forage on private and public lands. Both the livestock and the wildlife have a right to exist on our public range, but the animosity shows that co-existence is threatened. Several years of mild winters have led to record high populations of elk, without a concomitant increase in forage because rain and snowpacks were low. This has negatively impacted ranchers. BLM should address this problem in more detail, and work to resolve the situation. This may mean adopting its own wildlife goals, as opposed to merely echoing the Colorado Division of Wildlife, which depends on increasing numbers of elk and deer for hunters to shoot. Resolution of the problem may also mean that BLM must spend more money, which may be in short supply. You will need to be creative to get the job done. You also need to better coordinate your forage/wildlife/livestock management with the Forest Service, DOW, and private landowners. Each of these plays a role in providing wildlife winter range, and animals that winter under one management ownership inevitably move to another ownership in the summer. We did not see any RMP discussion of this issue.

The RMP has identified numerous acres of wildlife winter range, and it plans to maintain and improve that range to good condition. When we again have cold, harsh winters, the big game will need good lands at the lower elevations. Therefore, we support the goals stated for Management Units E-7 (3-118) and E-12 (3-123).

19 In general, HCCA supports the provision of forage for both livestock and wildlife, and expects BLM to find a balance between these uses. Hopefully, BLM will find a solution that satisfies ranchers, hunters, and the public which appreciates big game for aesthetic and emotional reasons. Alternatively, BLM may have to make a "hard choice" and take heat from one or more sectors of the public.

The public does not necessarily need or want huge numbers of elk and deer. Elk and deer are not the only wildlife. BLM is perhaps in a better position than CO DOW to manage for a diversity of wildlife, both game and non-game. We hope that your final RMP will analyze this.

4. Forage allocation
 We support the general goal of allocating increased forage first to watershed, because soil erosion is one of America's most serious long-term problems. As Savory notes, soil is our number one export. We send it to the oceans in enormous quantities. This erosion has led to severe non-point source pollution throughout the West, which harms aquatic environments.

Areas of Critical Environmental Concern

20 HCCA supports the designation of the ACEC's listed in Alternative D.
 HCCA believes that BLM should designate the East Gunnison as an ACEC. Its relevance goes beyond the mere maintenance of mule deer and elk populations (H-5). This land has seen severe

20 impacts from past use, and current situations allow us an opportunity for restoration. This parcel needs special attention!

21 In general, a serious problem with the RMP is its failure to analyze or explain why the particular ACEC's proposed in Alternative E were chosen. The RMP explains the screening criteria, but not the selection criteria. You might convince us that E is preferable to D, but you have made no effort to do so.

Lands and Rights of Way

22 We support the RMP's Acquisition Criteria, (D-6), but with the assumption that these are not ranked. Each criteria is equally valid.

23 The RMP has no Disposal Criteria. This is a serious flaw. The document contains a long list of disposal tracts, but insufficiently explains each disposal. We oppose this list because there is no criteria listing, nor any clear application of the criteria to the individual parcels. If the BLM has no applicable disposal criteria, we suggest that you adopt those of the GUNGS National Forest 1983 Land and Resource Management Plan.

We remind BLM that the policy of the United States is to retain ownership of its public lands. Adjustments can be made for public purposes, not private purposes. (The idea of disposing of land so that more land will be in private hands, and thus subject to property taxation or alleged "wise management with private profit incentives" has been totally debunked and rejected by the U.S. Congress, based on countless bad examples.)

24 HCCA requests that BLM look much more closely at the opportunities for land trading. It's true that many of the Gunnison Basin parcels are isolated and difficult to manage. These same parcels may be quite valuable to adjacent or nearby landowners. Those owners should not merely put up cash for the purchase. Those owners should instead acquire lands which will be valuable additions to the public domain, and offer them for trade. If the trade process is too burdensome, then BLM should go to Congress and request administrative procedure improvements. Land trades are potentially an excellent management tool, which neither USFS nor BLM have sufficiently utilized.

Our position is there should be no net diminution of public land holdings within the Gunnison Basin.

25 We are also concerned about the proposed rights of way for electric powerline corridors. The corridors are much too wide. For what possible reason would the electric utilities need a full mile of width? The RMP makes no explanation of this. The corridor need be no more than 500 feet wide, or up to 1000 feet in unusual circumstances.

Budgets

26 The RMP does not include a financial analysis, nor a budget. This is standard procedure for a USFS plan, so why not here? Can the plan be implemented on the existing budget? If not, how will you justify to Congress the increased spending? The public might be able to help you make such justifications, but you give us no basis for doing so.

If the plan requires an increased appropriation, what are the prospects for obtaining that increase? HCCA opposes the preparation of a plan which is based on unrealistic budgetary assumptions.

and of tourism to the local economy is recognized by BLM. That is one reason we would, in the PRMP, and in the Preferred Alternative, DRMP, place about 2/3 of the resource area in VRM Classes I, II, and III that place a high value on maintaining scenic quality. There are some lands in the resource area that are not adjacent to heavily used areas, that do not have outstanding scenic resources or have other resource uses which could result in major visual intrusions. In a full spectrum of multiple use management the diversity of needs in both preservation and development-oriented activities must be balanced. In this instance, Class I and II, which are on the preservation end of the scale, cover 37.5% of the planning area. Class IV covers 38.5% of the area and Class III, which is in between the two comprises the remaining 23.2%. Given the visual resources in the Planning Area, this is an appropriate balance. Among the changes we propose to existing VRM Classes in the PRMP and the Preferred Alternative, DRMP, are upgrades from Class IV to Class III in areas of moderate visitor use at Hartman Rocks and High Mesa. Please refer to the management unit prescriptions in the PRMP for detailed VRM management that is proposed.

13. The extent of use that occurs on public lands by the livestock industry is represented on pages 2-28 through 2-29 of the DRMP. These statistics represent to a degree the dependence of the industry on public lands. The information requested in the comment regarding economic contributions and prospects of the livestock industry are not available to BLM. The BLM could compile a history of livestock grazing, but this information would not greatly contribute to the RMP. Information regarding fees paid to BLM for livestock grazing are available at our Gunnison office.

Also, regarding the reference in the comment on comparing economic contributions of various resources, please refer to the responses to comments 8 and 9 of letter 35, and comment 40 of letter 38.

14. Please refer to the response to comment 19 of letter 35.

15. Please refer to the response to comment 9 of letter 35, and to page 3-3 of the DRMP for discussions of budget needs to implement the referenced actions. The increase mentioned on page 3-3 of the DRMP would apply to the PRMP as well. Please also refer to the discussion of activity plans under Livestock Grazing Management in the STANDARD MANAGEMENT section of Chapter Four in the PRMP.

16. Please refer to page 2-5, Chapter Two, of this PRMP for a discussion of the relationship of this PRMP and the April, 1980, Draft and the September, 1980, Final Gunnison Basin Livestock Grazing Environmental Impact Statement.

17. Please refer to the Standard Management for Livestock Grazing Management in the PRMP, pages 4-6 through 4-11, for language that has been modified to clarify how livestock grazing management, including managing for minimum stubble heights, would be implemented. Flexibility in the application of stubble heights that would be possible is also described. Allotment Management Plan preparation is also discussed in greater detail in the same section in the PRMP.

Minimum stubble heights are recommended in order to achieve the resource conditions in the Standard Management section for Livestock Grazing Management, and in prescriptions for certain of the Management Units in the PRMP. In riparian areas, achieving these levels would help maintain plant vigor and production, provide for quality livestock forage and wildlife habitat, provide a minimum of plant residue to trap sediment during high flows, buffer or reduce the energy of high flows, reduce erosion, and protect streambanks. The implementation of stubble heights could occur within a variety of grazing systems, including non-traditional or rest or deferred rotation patterns.

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Document presentation: Clarity and usefulness

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27 The document is well written, and the authors have made an obvious attempt to avoid using too many acronyms and technical jargon. The Summarized Comparison of the Management Alternatives is good. However, each paragraph should refer to succeeding pages so that readers can find more detailed explanations of each item. The Glossary is good. It could be improved. It does not explain "Category II" lands, and some other terms.

The most serious problem is the lack of an index. An index is crucial to analyzing the document. Its omission has made our task much more difficult. Indexing is an art, and you should pay careful attention to this need in the Final. A good index will facilitate everybody's use of the plan.

Conclusion

We are in full support of the principle of multiple use and sustained yield as provided by law. We emphasize the need to ensure that use does not degrade the resources, so that future generations can enjoy much the same benefits as we have today.

Our preceding comments should be taken in this broad context. We are well aware of the difficulties you have in balancing the many demands placed on the public lands you manage. We will take all of these factors (and others) into account in determining our future involvement in your planning process. We look forward to working with you in resolving use conflict as they arise.

Yours truly,


Gary Sprung
HCCA President

18. Please see the response to comment 13 of letter 50 regarding elk numbers and forage utilization on public lands. The BLM is also concerned about the conflicts referenced in the comment. We met with the county stockgrowers' association in July and December, 1991, to discuss their concerns regarding the DRMP as it relates to the conflicts. In addition, the initial Habitat Partnership Program meeting with all the referenced entities in the comment was held in August, 1991. Resolving the local issues to the satisfaction of all parties will take creativity and cooperation, and we are committed to this end. Please see the responses to comments of letters 38, 50, and others regarding wildlife-livestock issues, and, in the PRMP, the modified Livestock Grazing Management and Wildlife Habitat Management portions of Standard Management. The BLM incorporated these changes in the text as a result of internal review, the comments we received, and as a result of our meeting with the stockgrowers' association representatives. Recommended elk numbers of 9,000 throughout the Planning Area appear to be within the total carrying capacity for the habitat. Deer numbers are excessive, in certain locations of the Planning Area on public lands, however.

19. In the judgement of BLM, the recommendations in the PRMP provide a balance between multiple uses on public lands. Some of the actions are hard choices, which sometimes results in the RMP process and is commensurate with the responsibility BLM has to manage resources for the general public(s). The BLM would continue to manage habitat on public lands, with the aim being to provide a proper diversity of species and habitat.

20. See the response to comment 2 of letter 8.

21. The ACECs in each alternative, and the PRMP, were recommended for designation based on how they each contributed to meeting the objectives of the particular alternatives, whether special management attention was needed, and how each fit into the mix of uses BLM manages on public lands. See Table H-2, Appendix H, for the special values in each area considered and selected.

22. The Acquisition Criteria in Appendix D-6 are not prioritized or ranked.

23. The criteria for disposal of Category I lands through public sale are referenced on pages 3-13, 3-21, 3-53, 3-74, and 3-108 in the DRMP. The criteria are located in Section 203 of FLPMA, and are listed below.

(1). such tract because of its location or other characteristics is difficult and uneconomic to manage as part of the public lands, and is not suitable for management by another Federal department or agency; or

(2). such tract was acquired for a specific purpose and the tract is no longer required for that or any other Federal purpose; or

(3). disposal of such tract will serve important public objectives, including but not limited to, expansion of communities and economic development, which cannot be achieved prudently or feasibly on land other than public land and which outweigh other public objectives and values, including, but not limited to, recreation and scenic values, which would be served by maintaining such tracts in Federal ownership.

Each tract in the Appendix D that is listed for disposal in a particular alternative also has sufficient explanation that notes which of these criteria would be met, at this point. Closer examination of any specific tract might reveal that more criteria would be met, or that the public interest would not be served if the tract were disposed of. The tracts are available for consideration for disposal by exchange or other means. As is stated on the pages mentioned above in this response, the BLM is under no obligation to dispose of any of these lands by public sale or other means, but

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

they would be available to be considered for public sale or disposal by other means.

Criteria for disposal of, and an explanation of Category II lands are also located on the same pages as above in this response. These lands are not available for consideration for disposal by public sale. Please contact BLM for the criteria for disposal of public lands for a specific purpose or under a specific authority, such as the Recreation and Public Purposes Act or for Indemnity Selections by the state.

- 24. The Category I tracts that would be available for consideration for disposal by public sale are not excluded from being exchanged. The activity plan that would be prepared for these tracts would indicate disposal techniques, options, and priorities. All Category II lands are available for exchange.
- 25. The mile-wide widths for the rights-of-way corridors would provide the necessary flexibility such that utilities located in these corridors would be constructed along the very least impacting location in the corridor, while still providing the necessary width to locate multiple facilities within the corridor.
- 26. Please see the response to comment 2, 8, and 9 of letter 35.
- 27. The Category I and II lands are defined on the pages mentioned in the response to comment 23 of this letter. Consideration was given to providing an index in the PRMP. If the expertise and time had been available, an index would have been inserted.

Responses to letter 64

- 1. through 3. See the responses to comments 2 and 3 of letter 8, and 2 of 12, respectively.

Jon Hoff
3152 10th Street
Boulder, Colorado 80304
(303) 444-3157

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2/10/91

Dear Mr. Bottomly;

Some wonderful areas have been left out of ACEC protection in the Gunnison Resource area of BLM lands.

The area east of Gunnison is an important wildlife habitat as is the Cebolla Creek area, & should be protected.

The extremely popular Alpine Triangle is beautiful & should be a terrific place if not designated ACEC.

- 1 |
- 2 | All areas need protect
- 3 | from over-grazing by cows & from motorcycle use.

Sincerely,
Jon Hoff

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 65

Bill Bottomly
RMP Team Leader
Bureau of Land Management
2505 South Townsend Avenue
Montrose, CO 81401

Michael Robinson
Director
Sinapu
1900 Allison Street
Lakewood, CO 80215
June 15, 1991

Dear Mr. Bottomly,

65

The following are the comments of Sinapu on the Gunnison Resource Area's draft resource management plan and EIS (RMP/EIS). Please incorporate these comments into your planning pursuant to NEPA and all other relevant statutes.

As an introduction, I should mention that Sinapu is a non-profit citizen's group devoted to restoring and maintaining free-ranging populations of the Grey Wolf (*Canis lupus*) to Colorado (see enclosed newsletter for more information). As such, we must take an interest in management of our public lands to ensure that adequate and healthy habitat for wolves is provided.

We request that the BLM include in this RMP/EIS an analysis of wolf reintroduction on BLM land, and the effects wolf reintroduction would have on other values and uses of the land, as well as the effects other uses would have on successful wolf reintroduction. Such analysis could be appended to one of the existing alternatives, or a new "Alternative W" reflecting this action could be drafted. Statutory authority for initiating such an analysis is implied in the Multiple-Use Sustained Yield Act and other statutes, as reflected in your statement on page 3-103, that "Supplemental releases and/or reintroduction of T&E sp. and candidate or BLM sensitive species could be authorized following preparation of a release or reintroduction plan and environmental analysis, and consultation with the United States Fish and Wildlife Service (USFWS), Colorado Division of Wildlife (CDOW), and other affected parties." Note that neither the Endangered Species Act nor any other federal statute prevents the BLM from becoming the lead agency on reintroduction of an endangered species, regardless of opposition from a state wildlife agency. Furthermore, nothing short of a Section 7 "jeopardy" opinion from the U.S. Fish and Wildlife Service provides legal authority to pre-empt the BLM from reintroducing an endangered species.

Wolves on the resource area would provide the following benefits: a management tool to control ungulate populations at approximately natural (pre-European invasion) numbers and

behavior; enhancement of biological diversity; aesthetic pleasure for users of the public lands who appreciate increased natural conditions; and an economic draw for surrounding communities with significant dependence on tourism revenues. All these benefits should be examined in your analysis.

In the absence of any substantial mention of wolf reintroduction in the draft RMP/EIS, we must make the following observations which should be incorporated into your final analysis of the issue. First, wolves require large ungulate populations as prey bases. Second, wolves require riparian areas with healthy cover as travelways. Third, historically the greatest threat to wolves has been extermination efforts by and on behalf of livestock owners; therefore, better grazing techniques, decreases in livestock utilization, and vigorous preventive law enforcement are all likely to enhance the success of wolf reintroduction. (See David E. Brown, *The Wolf in the Southwest: The Making of an Endangered Species*. University of Arizona Press, 1984.)

In regards to ungulate populations, we have concerns about the statement on page 3-104 that "Reductions in CDOW's elk and deer long-range herd goals would be recommended for an interim period in certain Game Management Units (GMUs) until the vigor and production of the important forage shrubs on crucial winter ranges increase such that habitat would support long-range herd numbers." Planned reductions in elk and deer population goals should only occur after reductions in the number of domestic livestock, and with a clear timetable about how long such reductions would occur.

Furthermore, after inventories of crucial winter range and calving areas for elk, deer, pronghorn and bighorn sheep have occurred, no developments or actions should take place that may jeopardize the continued utilization of those areas by these animals. This includes road construction or use, off road vehicle use, competing livestock use, and other disturbances. If an area has not yet been properly inventoried for winter range or calving grounds, management should treat it as if it was such an area. Reference on page 3-103 to wildlife habitat management "consistent with BLM's Fish and Wildlife Plan for Colorado--Program for the Decade," is improper and deceptive considering that this document is not yet available to the public for review (letter of 4/11/91 from W. Bottomly to M. Robinson), and therefore cannot be subject to NEPA standards. We request that either the BLM specify exact standards for wildlife habitat management in the RMP/EIS, or it make the Fish and Wildlife Plan for Colorado--Program for the Decade, a NEPA standard document, subject to a separate EIS.

1. The BLM is not considering a wolf reintroduction program in the DRMP or the PRMP. To do so would necessitate republishing and another distribution of the DRMP for internal and public review. If the appropriate agency or entity wanted to initiate an introduction program, and the area under consideration included public lands, the BLM would participate to the degree required in the analysis and evaluation process. A RMP amendment would be required before this request to use public lands for this purpose could be approved.
2. Please refer to the response to comments 11, 15, 16, and 20 of letter 38, regarding carrying capacities and the relationship between CDOW and BLM regarding requests for reductions in population numbers. Please also refer to the Wildlife Habitat Management paragraphs in Standard Management of the PRMP for additional information regarding reductions in wildlife numbers. The majority of the resource area is used as winter range by elk and deer and our monitoring studies indicates very little overlap between game and livestock. Removing livestock would not automatically mean additional forage would be available for elk and deer. Elk tend to use public lands from mid-December to early April, feeding on shrubs and residue left on the grasses. In mid-April, as grasses start to green up and grow the majority of elk are gone from public land winter ranges, having moved onto higher altitude lands. Although deer do stay on public winter range until approximately May, the amount of forage that would be utilized by deer is minimal.
3. Please see the description of the PRMP in Chapter Four for the mitigation and conditions that would be implemented in order to protect the referenced habitats. Maps of winter ranges or calving areas would be updated when inventories are conducted, rather than assuming these conditions exist throughout the Planning Area.
4. A copy of the referenced document was provided to Mr. Robinson.
5. Please see the response to comment 8 of letter 63.
6. There currently is no state or federal law which allows for instream flow appropriations to specifically protect or maintain vegetation.
7. Please see the response to comment 1 of this letter. The factors in the comment would be considered at the appropriate time.
8. In the judgement of BLM, utilization of 40-60% of the current year's growth of key species, as addressed in Alternative E in the DRMP, would maintain forage and wildlife cover under the need for multiple use considerations. The 2 1/2 inch minimum stubble height is generally intended to maintain the condition of riparian areas and to begin improvement of degraded areas. More rapid or further improvement would be accomplished through activity plans, such as Allotment Management Plans or coordinated resource management plans.
9. Please see the response to comment 1 of this letter. In addition, riparian areas are vitally important ecosystems, and BLM is mandated to manage public lands, including riparian areas, for multiple uses. One of these uses is livestock grazing.
10. Please refer to the Livestock Grazing Management section of STANDARD MANAGEMENT in Chapter Four of the PRMP for a discussion of stubble heights. Please also see the response to comment 1 of this letter.

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11. Please see the response to comment 1 of this letter. In addition, BLM's Interim Management Policy For Lands Under Wilderness Review (IMP) requires that no uses can occur in WSAs that impair wilderness values. Valid existing rights are recognized in WSAs, and some uses are grandfathered. The IMP must be taken into account, however, when any use is applied for in a WSA. If any part of any existing WSA is acted upon and not designated by Congress, the lands would be managed according to the description of the PRMP in Chapter Four.

5 As regards riparian areas, we support the statement on page 65 3-105 that "instream flow appropriations would be pursued on 113 miles of fishery streams to ensure a sufficient amount of water for fisheries protection." We would like this extended to all riparian areas within the planning area where water rights have not been previously appropriated, and we would like the BLM to apply for instream flows, subject to state and federal water law, on behalf of sufficient vegetation needed by future wolf populations for secure travel.

6 We do not believe 2-1/2 inch minimum stubble (page 3-105) is sufficient for secure wolf travel corridors, as a wolf is likely to stand over two feet tall. Additionally, consumption of "40-60% of the current year's growth by weight of key forage species" will not "provide for quality forage and wildlife cover" (page 3-105) considering that six to twelve inches is the normal indicator of vegetative range readiness (table B-4, appendix). Consumption of 40-60% of the difference in height (roughly equivalent to difference in weight) between the minimum stubble (2.5 inches) and the forage readiness indicator (6-12 inches) will not allow for the regeneration of healthy riparian zones. In order to allow for secure wolf travelways, as well as healthy utilization of riparian zones by a host of other species, we request complete and permanent removal of livestock from all areas within 30 feet of riparian corridors. Should the BLM not choose this option, we request sufficient riparian stubble heights to allow for secure wolf travelways, as well as effective utilization for other species.

8 We also request that the minimal stubble height for all non-riparian areas and each forage species be the figures in table B-4. If livestock utilization threatens those minimal stubble heights, the livestock should be relocated or removed. If wildlife utilization threatens those standards, wolves should be the prime management tool to reduce wildlife numbers or change their grazing habits.

9 In order to provide undisturbed habitat for wolves and other human-sensitive species, we request no road construction or other industrial disturbances in all inventoried WSAs, as well as other, smaller roadless areas, whether or not Congress designates them as Wilderness.

10 Thank you for incorporating these comments and concerns into your analysis and decision-making process. Sinapu looks forward to continued constructive involvement with the BLM in management of our public lands.

Sincerely,



Michael Robinson,

Director

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APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 66

SHAVANO SOIL CONSERVATION DISTRICT
 c/o Lester Jones
 60469 Carnation Road
 Olathe, CO 81425

66

June 14, 1991

Mr. Bill Bottomly
 RMP Team Leader
 Bureau of Land Management
 2505 S. Townsend
 Montrose, CO 81401

Mr. Bottomly:

These comments are a combination of concerns expressed by the Shavano Soil Conservation District Board of Supervisors and the Montrose Field Office of the Soil Conservation Service. They reflect concerns expressed by local cooperators of the District and technical experts within the Soil Conservation Service.

To start off, we'll take a general overall look at the document and then get specific with the preferred alternative #E.

1. 1.) The general document never recognizes livestock use has a historical use. Evidence shows that livestock, sheep, cattle, horses, have been in the Gunnison basin in relatively large numbers since 1876. (conversation with editor of Lake City newspaper) Other historical uses such as mining and railroading are mentioned, but livestock use is not.

2. 2.) In the affected environment, chapter two, section Surface Water Quality; it is stated that riparian areas are over utilized by livestock. No mention is made of use by big game species, especially elk. Soil and range correlations carried out by SCS in the West Elk Wilderness areas where livestock grazing does not occur, indicate that elk can and do over use riparian areas, extensively.

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3. 3.) In the affected environment, chapter two, Sage Grouse section; statements are made that large sagebrush treatment are to blame for low sage grouse numbers. In 1987 the SCS did a survey of the number of sagebrush acres treated in the past 10 years. Less than 5% of the total acres in sagebrush had been treated. Using a yearly average of 5% it seems hardly imaginable that this theory has any merit. Quite the opposite is a more reasonable approach. Sage grouse need grasses and forb seeds to support young. Sagebrush inhibats forbs and grasses, especially dandelions that can be found around riparian areas. To leave heavy infestations of sagebrush along riparian areas lowers the water table which in turn does not allow grasses and forbs to dominate.

4. 4.) In the affected environment, chapter two, Water Resources Section, the soil erosion monitoring summary, basal cover is measured against the potential plant cover. The range sites mountain loam, dry mountain loam, and subalpine loam have low basal cover. The reason for this is the high amounts of sagebrush in the plan community. The SCS has inventoried much of the BLM, private and Forest Service lands in the Gunnison Basin and found this to be the case. A contradiction is occurring here in that the preferred alternative E is recommending no vegetative treatments on these sagebrush communities, 201,644 acres, (Table S-1, Livestock Grazing Management, Alternative E, page S-12). How can basal cover be increased with this approach?

5. 5.) Alternative E states that a 2 1/2 inch stubble height will be maintained through the growing season. Problems with this are that many alpine plains may not achieve this because of the short growing season, but grazing would be ok if allowed to take 50% of the annual growth. Kentucky bluegrass, which makes up a significant amount of the plant community on lower ranges can be safely grazed below a 2 1/2 inch stubble height. A 50% utilization of annual growth would be a better alternative to gauging usage than a set stubble height.

6. 6.) Much in the management plan has been written about the spreading of disease from domestic sheep to bighorn sheep. This appears to be speculation at best and undocumented. Implying that domestic sheep in allotment 6112 are spreading disease to bighorn backs this up when the permittee of this allotment has not had sheep here for a number of years. (conversation with permittee).

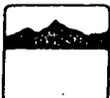
1. Historical domestic livestock use was not mentioned in the DRMP, along with historic use of most resources and values. The omissions do not, however, imply that BLM is not aware of the historic and current importance of these resources and uses.
2. Please see the response to comment 41 of letter 38. Monitoring studies conducted on many of our riparian areas over the last 9 years shows that game use along these areas make up approximately 0-5%.
3. The amount of acres treated is only one factor when evaluating the over all effects of land or vegetative treatments on grouse. Sage grouse require a variety of sagebrush structure during their life cycle, and even small treatments conducted in the wrong location could have a significant impact on grouse. Much depends on the size of the area treated in relation to suitable habitat available. For example studies have shown that treating only 31 percent of the total suitable habitat resulted in a 63 percent loss in male attendants on strutting grounds in some locations.
4. Range treatments or projects would be excluded on approximately 4,294 acres only, as noted in Table S-1, page S-12, in the fourth paragraph from the top under Alternative E (Preferred Alternative). These exclusions would affect all suitable public lands in units E-4, E-6, and E-9, and 827 suitable acres in unit E-7. See the response to comment 34 of letter 38 for information on range treatments or projects that would be restricted in the same alternative.
5. See the response to comment 7 of letter 60.
6. Please see the responses to comments 38 of letter 50, and 8 of letter 60. Records in the Gunnison BLM office show that 1,100 sheep were trailed through Allotment (6112) in 1987.
7. Please refer to the response to comment 1 of letter 20. In addition, grazing and recreation coexist on the majority of lands in the resource area. One area where a conflict exists is in American Basin. The midsummer wildflower displays in this area are one of the most outstanding attractions in the San Juan Mountains. The Preferred Alternative in the DRMP recommends the elimination of livestock grazing within the American Basin (Management Unit E-4) in order to maintain and protect scenic resources, specifically the wildflower displays. As a result of public comments received, and after considering other options, livestock grazing in American Basin would be permitted according to the prescription for unit 4 in Chapter Four of the PRMP. Visitor brochures would be published, and interpretive signs would be installed at American Basin that would include positive messages about grazing. Please refer to the management prescription for Management Unit 4. The PRMP contains modifications to language contained in the DRMP in order to recognize to a greater degree the importance of livestock grazing in the Planning Area.

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7.) The last comment concerns the attitude of the Resource Management Plan. The plan emphasizes that livestock and recreation opportunities are incompatible. (Management Unit E-1, Alpine Triangle, last paragraph page 3010). Incompatibility is a state of mind. Tourists coming to Western Colorado come to see the beauty along with its heritage. Mining, railroading and certainly cowboys are a part of this heritage. There is know reason why the federal agencies can not or will not promote this. What kid won't hang his head and camera out the window to take a picture of a cowboy driving cattle up the highway. Or how about a sheep herder tending a flock of sheep high in the Rockies. If tourists were made more aware of the fact that livestock and recreation are compatible than most of the conflicts wouldn't happen. Information signs would be helpful. Sheep have been in the Lake City high country for over 100 years and according to SCS inventories have certainly not degraded the area.

Respectfully,

Joel Miller Shavano SCD Supervisor
 Lester Jones, Chairman Shavano SCD



colorado environmental coalition

777 Grant Street, Suite 606
 Denver, Colorado 80203-3518 • (303) 837-8701

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June 14, 1991

Bill Bottomly
 RMP Team Leader
 Bureau of Land Management
 2505 S. Townsend Ave.
 Montrose, CO 81401

Dear Mr. Bottomly,

The following are comments of the Colorado Environmental Coalition (CEC) in regards to the Gunnison Resource Area Draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). CEC is a non-profit conservation organization with over 1,500 individual members and 37 member groups whose total membership exceeds 50,000 individuals in Colorado. The mission of CEC is to achieve the conservation of natural resources and the preservation of environmental values, primarily in Colorado, through the coordination of the environmental community. CEC's members frequently visit and enjoy recreation activities in the Gunnison Resource Area and are vitally concerned about the protection of environmental values on these lands.

We commend the BLM staff for producing a document that is easy to comprehend and clearly lays out various alternatives. Although we still found it challenging and cumbersome to compare the various management alternatives for particular parcels of land, this seems to be an inherent downfall of EISs. The summary table at the beginning of the document helped immensely to understand the general differences in management between the various alternatives. While we are pleased with the range of alternatives, we question whether Alternative D's objective, "to emphasize a high degree of protection, enhancement, and maintenance for natural values," is really carried out in the specific proposed on-the-ground management actions. For example, we believe that an alternative that protects and maintains natural values would designate many more areas and acreage as Areas of Critical Environmental Concern (ACECs) than Alternative D does.

The Gunnison Resource Area contains some of the most spectacular and most popular BLM lands in Colorado. Many constituency groups beyond the traditional extractive users spend considerable amounts of time in the resource area. Because of this use and the shifting values of the American public toward protection of the public lands, we believe the BLM needs to take an even stronger role in resource protection, grazing management, and recreation management in the Gunnison Resource Area than what is outlined in the draft's preferred alternative.

"Humanity belongs to earth, not earth to humanity"

Responses to letter 67

1. The objectives of Alternative D do not include the consideration to necessarily recommend all potential ACECs for designation. The 10 ACECs selected for that alternative met the objectives more so than did other potential ACECs.
2. Thank you for the general comment. It was considered in the formulation of the PRMP.
3. Please refer to the response to comment 2 of letter 8 for information regarding the potential ACECs mentioned in the comment.
4. See the response to comment 1 of letter 8 and to the responses to letter 72.
5. See the response to comment 2 of letter 12.
6. Please refer to the response to comment 4 of letter 12, and comments 4 and 5 of letter 63.
7. The BLM manages only about 400 yards of land along Tomichi Creek. To develop and encourage public access along these lands could potentially cause more problems than benefits. The BLM in the past has explored the possibility of public fishing easements with little success. We will continue to be prepared for opportunities that may arise.
8. See the response to comment 6 of letter 63. In addition, the level of development would be decided based on site development plans and available funding, but is anticipated to be pretty basic. We would consider your suggestions at the appropriate time.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

- 9. Please see the responses to comment 3 of letter 8.
- 10. Please see the Livestock Grazing Management section of STANDARD MANAGEMENT in Chapter Four, for areas where a 4" minimum stubble height would be required. This section has been extensively revised.
- 11 and 12. Please see the responses to comments 5 and 6 of letter 11, comment 19 of letter 35, and the description of the PRMP in Chapter Four.
- 13 and 14. Little activity, if any, is anticipated regarding oil, gas, and geothermal leasing. The detail regarding this resource in Chapter Two, Effected Environment, DRMP, is compatible with the anticipated effects to, and from development of, this resource.

Leasing of geothermal resources is discussed in the introduction to each alternative in the STANDARD MANAGEMENT sections. Exceptions to this are discussed in the management unit descriptions. Although no geothermal development is anticipated, if an application is received for a geothermal lease, the protective stipulations applicable to oil and gas leasing would apply. No plan amendment would be required.
- 15 and 16. The stipulations included in the DRMP and PRMP, regarding oil and gas and geothermal leasing provide the protection warranted, considering the environmental consequences predicted from such leasing.
- 17. General location maps and a table showing where oil and gas stipulations would be applied are included in Appendix K in the PRMP.
- 18. Refer to the changes to the text of the DRMP in Chapter Three of the PRMP for clarification of impacts to various resources from the reasonable and foreseeable development scenario of one or two wells. These changes have been included in the discussions of impacts to the various resources in Chapter Five in the PRMP. The overall Planning Area impacts upon any one resource, or cumulatively, are not expected to be significant as a result of the reasonable and foreseeable development scenario. During the consideration of any exploration permitting or Applications for Permit To Drill, site-specific situations would be examined and proper mitigation applied, according to stipulations, lease clauses, and BLM policy and regulations.
- 19. Based on the reasonable and foreseeable development scenario of one or two wells over the life of the plan, the Planning Area-wide impacts to any resource, individually or cumulatively, would be insignificant. Oil and gas stipulations in the DRMP Preferred Alternative and PRMP (see Appendix K), in the judgement of BLM, offer the required degree of protection for resources and reduce the identified impacts to the point where the impacts are not significant.
- 20. The most reasonable and foreseeable development scenario predicts that one or two oil wells could be drilled during the life of the plan. The impacts, Planning-Area wide, from this level of activity have been determined to be insignificant. BLM has, however, placed stipulations in areas where even one well and associated facilities could potentially cause undesirable effects to some values. Please see the maps and table in Appendix K of the PRMP for areas in which these stipulations would be applied. Please also see the discussion of environmental impacts in the PRMP for rationale in applying these stipulations.

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1. Areas of Critical Environmental Concern

CEC supports all the Area of Critical Environmental Concern (ACEC) recommendations made in the preferred alternative. In particular, CEC applauds the BLM's decision to designate the West Antelope Creek (Unit E-7) as an ACEC. This area provides important game and wildlife habitat, including critical winter range required for maintaining healthy populations of elk, bighorn sheep, and deer. The area is nationally important for hunting, with local communities reliant upon the income these hunters generate. The area also provides critical bald eagle habitat. Additionally, the West Antelope Creek area includes Haystack Cave, a significant paleontological site.

CEC believes the combined forces of overly large elk and deer populations combined with heavy hunting pressure could have potentially negative impacts on bighorn sheep populations and the overall naturalness of the area. Concerns in the planning area regarding bighorn sheep center on limited winter range and forage availability during the winter months, resulting in herds below carrying capacity. Balancing hunting use with desirable herd sizes indicates that the area requires special management attention which ACEC designation would provide.

The Haystack Cave unit was first documented for its archeological values in 1939. The site is currently under consideration for nomination to the National Register of Historic Places. This is the only known site that has produced both shrub ox and Woodland musk ox remains. Given the value of the remains and the potential threat of vandalism, Haystack Cave clearly is in need of ACEC designation.

While we applaud the BLM's recognition of the relevance and importance of the West Antelope ACEC, we believe rigorous and consistent application of the ACEC guidelines calls for immediate designation of several other areas that are equally deserving of special management attention. These areas include the all of the Alpine Triangle area, the East Gunnison area, and the Cebolla Creek area.

Alpine Triangle

The Alpine Triangle Area, designated Management Unit E-1 in the preferred alternative, is recognized by the BLM as the most popular and heavily used BLM area in Colorado. While CEC is pleased that the BLM has recommended three units within Management Unit E-1 for ACEC status, we believe that Unit E-1 in its entirety demands special management attention.

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The significant cultural, historic, environmental, and scenic resources of the Alpine Triangle attract national attention. As a consequence of this notoriety, the area receives intensive recreational use. The habitat is fragile and historic sites are deteriorating. The values that are the basis for the area's popularity and which fuel the local economy are under assault from mineral development, vandalism, and misuse.

While the recommended ACECs within the Alpine Triangle area address some of CEC's concerns, namely protecting Fritillary butterfly habitat, the Slunglillon Earthflow, and the intensively used American Basin, the remaining portion of E-1 demands special attention. The other areas within Unit E-1 require a careful management balance to protect and enhance both recreational usage and natural values.

For example, critical bighorn sheep habitat falls within Unit E-1. Given herd sizes below carrying capacity, this resource needs special management attention to ensure herd viability and to reduce conflicts with domestic livestock grazing and increased human activity. Protecting bighorn sheep habitat, however, does not necessarily coincide with the area's broad recreation appeal. These concerns in regards to achieving a balance between human activity and natural values are most appropriately addressed by designating the entire Alpine Triangle an ACEC as outlined for Management Unit B-2.

East Gunnison

We support ACEC designation for the East Gunnison area, which is located in Management Unit E-12. Management for E-12 as presently contemplated in the preferred alternative does not contain measures that adequately address concerns regarding crucial elk and deer habitat currently threatened by livestock grazing. CEC is concerned about negative impacts caused by improperly grazed livestock on riparian zones and forage availability.

The East Gunnison area is nationally renowned for high quality big game hunting. Plans must be made to improve the quality and quantity of winter game habitat. Wildlife must be given priority over all other activities on this range and for all additional available habitat resulting from improvement projects. Given the special attention required to manage the conflict between wildlife habitat and livestock grazing operations, CEC supports the designation of the East Gunnison ACEC as stipulated in Alternative B, Management Unit B-6.

Cebolla Creek

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3 CEC believes that the Cebolla Creek area merits ACEC designation as suggested in Alternative D, Management Unit D-8. This area would fall in Unit E-10, under the preferred alternative. BLM seems to recognize the national importance of this bighorn sheep habitat and the desirability of establishing a self-sustaining herd. CEC believes that the ACEC designation contemplated in Alternative D would facilitate these efforts. The herd was virtually wiped out by disease transferred from grazing domestic sheep in 1990. Prior to that time the area was a source for animals for Colorado Division of Wildlife transplant and reintroduction efforts. CEC believes that the special management provided by ACEC designation is necessary to ensure that habitat neither decreases nor deteriorates, allowing the herd to attain desired size.

II. Wild and Scenic Rivers

4 Contrary to the recommendations made in the draft RMP/EIS, the Colorado Environmental Coalition believes the entire 57-mile long stretch of the Lake Fork of the Gunnison meets the eligibility requirements of the Wild and Scenic Rivers Act. We believe the logic employed in the suitability analysis for segment A is flawed. For detailed comments outlining our concerns regarding wild and scenic river studies in the Gunnison Resource Area please refer to the letter dated June 14, 1991 which was submitted by Tom Cassidy on behalf of both American Rivers and the Colorado Environmental Coalition.

III. Recreation Management

5 CEC generally agrees with the BLM approach to managing recreational opportunities in the Planning Area. Recreational use, which is forecasted to increase in the years ahead, must be managed to protect and restore resource values. We believe massive and irreversible resource damage from motorized recreational users will occur unless all jeeps, motorcycles, and ATVs are restricted to existing trails at all times in the resource area. This restriction is necessary to prevent habitat destruction, erosion, and scarring of the land.

6 Because of increasing hiking and mountain biking pressures in the Gunnison Resource Area, we believe more single track trails are needed outside proposed wilderness areas. These new non-motorized trails will help alleviate conflicts between motorized and non-motorized users.

7 Tomichi Creek represents a superb angling resource in the

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7 resource area. Unfortunately, most of the Creek runs through private lands. In addition to improving access on BLM tracts along this stream, CEC encourages the BLM to seek access from private land holders to improve accessibility for the general public. Special regulations, such as catch and release, would ensure landowners that the resource would not deteriorate.

8 The informal campground north of Crested Butte along the Slate River at the mouth of Oh Be Joyful Canyon receives heavy recreational use. A much more detailed management direction needs to be provided for this area in the RMP/EIS than the virtual non-direction that is found there now. CEC believes that outhouses need to be constructed at this popular site immediately to alleviate a growing sanitation problem. This area needs to be periodically monitored to evaluate the level of use it receives and what kind of resource damage this use is causing. If it is determined that resource damage is occurring, such as loss of vegetation, then the BLM needs to take action to stop this damage and restore the area. CEC believes making this area a formal campground should be the last step taken after other measures are tried. These other measures include: log barriers to restrict vehicles to particular areas, crude semi-permanent fire rings, etc. If this area is made a formal campground, recreationalists who seek a more semi-primitive camping experience will be pushed out and will disperse to other nearby public lands, starting the same resource damage problems over again, except now over a larger area.

IV. Grazing Management

9 CEC believes that environmental values, including but not limited to wildlife habitat, vegetation cover, and healthy riparian systems should be given priority over domestic livestock grazing. Much of the habitat in the Gunnison Resource Area is in poor or fair condition as the consequence of inappropriate grazing and over-grazing in the past. Concerns within the resource area include a lack of up-to-date vegetation trend data, heavy to severe utilization of riparian areas, undesirable plant compositions, stream channel and stream bank erosion, and below potential forage production.

10 CEC believes that minimum 4 inch stubble heights should be maintained throughout much of the range. This would accomplish a number of desirable goals such as controlling sediment loss, improving and protecting fisheries, and improving wildlife habitat. Long term management practices should seek to restore the rangeland to good condition and improve riparian habitat.

11 Under preferred alternative E, improvement is expected in the

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11 quantity and quality of livestock forage. The plan presented gives little indication of how this will be accomplished. Furthermore, comparison of this RMP/EIS with data from the 1980 EIS shows little if any improvement over the last planning period. In light of this track record, the current Plan gives scant hope for future improvement of resource conditions. Restricting grazing allotments is a crucial step in improving environmental values and ensuring long term forage productivity gains.

V. Oil, Gas, and Geothermal Resources

13 Relatively little is said about oil, gas, and geothermal resources in the Draft RMP/EIS. Geothermal resources, for example, are introduced on Page 2-8 as follows:

Areas surrounding known hot springs at Powderhorn, Maunita Hot Springs, and Ranger-Cement Hot Springs have been assessed as having geothermal potential. No serious geothermal exploration has been done in the planning area.

14 But it's not clear what the BLM policy will be if one or more requests for geothermal leases are filed. The Final RMP/EIS should be specific on what will be done. Without further information, the CEC position is that the Final RMP/EIS should explicitly indicate that a plan amendment would be required in order for any geothermal leases to be issued.

The Draft EIS goes into more detail on oil and gas, but still is not complete. Particular issues which are not addressed include: the need for more No Lease acreage, the undue reliance placed on No Surface Occupancy (NSO) stipulations and timing limitations, a lack of adequate maps, and an inappropriate conclusion as discussed in the subsections below.

More No Lease Acreage Needed

15 According to the Draft, there is low potential for the occurrence of oil and gas on public lands in the Gunnison Resource Area. Consequently, very little exploratory drilling is anticipated (i.e., two wells over the next 10-12 years). Nevertheless, the Preferred Alternative would leave 680,911 acres in the area open to leasing and close only 46,007 acres, per Table S-1 on Page 5-2.

Given the relatively high value of other resources besides oil and gas on much of the public land in the area and the low potential for oil and gas, this imbalance is absurd. Much more

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acres should be No Lease. Oil and gas exploration and development is just one of many multiple uses. Lands with other resource values and uses that are incompatible with oil and gas development need to be protected and should be off-limits to oil and gas leasing.

In the 1987 Oil and Gas Leasing Reform Act, Congress gave the BLM discretionary no-lease authority to protect these lands that have a fundamental conflict with oil and gas development. The Draft RMP/EIS falls far short of meeting this objective.

15 Lands in the Gunnison Resource Area that are incompatible with oil and gas development and therefore should be placed in the discretionary No Lease category include: roadless areas; wetlands; river corridors and accompanying riparian areas, including potential wild and scenic rivers; research natural areas; crucial wildlife habitat, such as big game winter range; lands at and above timberline, including tundra; popular dispersed recreation sites; developed recreation sites, with a minimum one mile buffer zone around them; scenic by-ways; habitat for threatened and endangered plant and animal communities; municipal watersheds; and cultural sites, with at least a 1/2 miles buffer around them.

Specific areas of concern in the planning area that should be closed to oil and gas leasing includes: all Wilderness Study Areas, the Alpine Triangle SRMA, American Basin ACEC, Cochetopa Canyon SRMA, Dillon Pinnacles ACEC, West Antelope ACEC, Lake Fork ACEC, Powderhorn SRMA, Redcloud Peak ACEC, Stungullion Slide ACEC, and South Beaver Creek ACEC.

Undue Reliance on No Surface Occupancy and Timing Stipulations

16 The Draft RMP/EIS relies far too heavily on the No Surface Occupancy (NSO) stipulation and timing limitations in areas that should be closed to leasing instead, because there is a fundamental conflict between oil and gas development and other resources. Timing limitations and NSO stipulations are not adequate.

While the protection of surface resources may appear to be the same on paper, we assert the affect of No Lease versus NSO or timing limitations is very different on the ground. In the vicinity of a parcel with an NSO stipulation, industry gets the message that it's okay to build roads, drill for oil and gas, and develop the area--as long as the activity is kept off the NSO parcel. In the vicinity of a parcel with a No Lease stipulation, on the other hand, industry is not nearly as apt to show interest in development because they would not be able to put together the sort of lease block most projects require to justify the economics of developing a prospect.

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16 The Draft RMP/EIS does not consider this critical difference between the stipulations. We believe the Draft places undue reliance on the NSO and timing stipulations. The parcels we have suggested for No Leasing above, for instance, require more complete protection from development. In ACECs and SRNAs where it's been determined that oil and gas development is not in the public's best interest, all acreage should be No Lease.

Lack of Adequate Maps

17 The Draft RMP/EIS does not include maps with sufficient detail to illustrate which particular lease stipulations are in place on areas open to oil and gas leasing. The CEC maintains that these maps should have a scale of 0.5 inch/mile and show accuracy down to 40 acres. These stipulation maps must go beyond a general map grouping the various timing, NSO, and controlled surface use stipulations into single categories. Each particular stipulation must be shown, i.e. the map should not just show that an area has a timing stipulation, it must show what particular timing stipulation is in place. Furthermore, overlapping stipulations need to be shown.

The CEC asserts these maps are especially important considering that the BLM has failed to attach the appropriate stipulations to parcels during recent oil and gas lease sales. Without detailed maps, the public (and organizations like CEC) cannot determine whether the proper stipulations are attached to lease parcels offered for sale.

Inappropriate Conclusion/Inadequate Analysis

18 The National Environmental Policy Act (NEPA) requires that the impacts of a federal action that significantly affects the human environment be outlined before a decision on the action is made. Since oil and gas leasing on the public lands, a federal action that significantly affects the human environment, is an irretrievable and irreversible commitment of resources, site-specific analysis must occur before oil and gas leases are issued.

19 On Page 4-55, the Draft EIS/RMP is wrong to equate low potential with no significant impacts. The environmental impacts of drilling one or two wells would depend on the well location(s). We agree that the impacts would not be significant in many places. However, the environmental impacts would be significant in a number of others. In regards to oil and gas, a primary purpose of the this type of document is to identify those lands where impacts would be significant and to mitigate impacts through stipulations or closing the area to oil and gas leasing entirely.

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Time after time, we object to oil and gas exploration and development on public land in areas with other outstanding resource values which are incompatible with oil and gas development and which far outweigh the economic benefits of drilling a well. Again and again, however, we are told that because a lease was issued, the private company has a right to drill on public land, so the well is permitted and construction begins.

20 When roads are built and well sites bulldozed, the other more valuable resources are lost. Wildlife habitat is encroached upon and destroyed. The CEC believes that if the Preferred Alternative of the Draft RMP/EIS is approved as written, this sort of abuse will be allowed to continue in the Gunnison Resource Area. Now is the time to stop such development pressure by making lands with other outstanding resource values which are incompatible with oil and gas development off-limits to oil and gas leasing in the first place.

VI. Conclusion

The Colorado Environmental Coalition appreciates the opportunity to review the Draft RMP/EIS and participate in this decision making process. We hope our involvement will facilitate the creation of a Final RMP/EIS we all can be proud of and support.

Sincerely,

Todd Robertson
Public Lands Coordinator

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Responses to letter 68

Motorcycle Trail Riding Association

P.O. Box 3033, Montrose, Colorado 81401



June 12, 1991

Bill Bottomly, RMP Team Leader
Bureau of Land Management
2505 So. Townsend Ave.
Montrose, CO 81401

68

Dear Sir:

After reviewing the 1991 "Gunnison Resource Management Plan and Environmental Impact Statement (RMP/EIS)" draft, the Montrose, Grand Junction and Boaring Fork Chapters of the Motorcycle Trail Riding Association (MTRA) wish to enter the recommendation that "Alternative 4" (No Action) is the most desirable avenue for the BLM to follow at this time.

In light of other, pending, action by BLM and the United States Forest Service in reducing the traditional access and use of our public lands for, in most cases, a perceived need, we strongly favor a direction change by the federal land managing agencies which will retain historic, evolved, use patterns in each area. We feel that federal agencies and their employees must pay special attention to the needs and economic realities of the residents of each locale in which they find themselves; however temporary that assignment may be. With the closure of the Sunnyside Mine in Silverton, the Hocol pull-out at Parachute, the Mid-Continent shutdown in Paonia, the threat of industry-killing grazing fee increases, etc., further restrictions on free enterprise could mean disaster for Western Colorado.

We, therefore, call upon your agency to return to managing the public lands under your custodianship by the principles set forth in the Federal Land Policy & Management Act of 1976, i.e., to manage "for human occupancy and use" rather than merely reacting to single-focus input from ANY single group, individual or entity.

Sincerely,

Kevin Anderson

Kevin Anderson, MTRA/Montrose Chapter President

Mike Johnson

Mike Johnson, Member/MTRA Board of Directors

cc:

Senator Hank Brown
Congressman Ben Campbell
Delos "Cy" Jamison
file



Responses to letter 69

June 12, 1991

Mr. Alan L. Kesterke, District Manager
Montrose District
Bureau of Land Management
2505 South Townsend Avenue
Montrose, CO 81401

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Mr. Barry A. Tollefson, Area Manager
Gunnison Basin Resource Area
Bureau of Land Management
216 North Colorado Street
Gunnison, CO 81230

Mr. Bill Bottomly, RMP Team Leader
Montrose District
Bureau of Land Management
2505 South Townsend Avenue
Montrose, CO 81401

RE: COMMENTS ON GUNNISON RESOURCE AREA DRAFT RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT (DRMP/DEIS).

Gentlemen:

The Taylor Park Cattle Pool hereby submits its written comments on the DRMP/DEIS. The Taylor Park Cattle Pool represents the permittees in Alder Creek (6302) and Cabin Creek (6301). Taylor Park has limited its comments to those areas having a direct affect on them.

WILDLIFE ISSUES: REFERENCE 2-17 page 224

1 Taylor Park Cattle Pool members strongly oppose the use of private land during critical periods of the year by big game and private lands should not be considered for the purpose of population goals of big game.

2 From our observations there is far too much emphasis concerning SAGE CHICKEN HABITATS being adversely affected by range improvement projects. Furthermore there has been no sagebrush treatment on our allotment in recent years and yet there has been a drastic reduction in Sage Chicken numbers. Lastly, what changes in the present hunting management would facilitate a faster response in the sage chicken, grouse population?

1. Please see the response to comment 18 of letter 50 regarding big game winter range mapping, and comment 18 of letter 63

The BLM recognizes the conflict of elk using private lands during critical times of the year. We are also aware that CDOW long range herd for GMUs include all lands in the GMUs, not just public, or FS, or state lands. The BLM is confident that, under the correct circumstances, the recently initiated Habitat Partnership Program will lead to resolutions of some of these conflicts in the Planning Area.

2. Please see paragraphs 4, 5, and 6, in the response to comment 20 of letter 50.

3. Please refer to the Standard Management for Livestock Grazing Management in the PRMP, pages 4-6 through 4-11, for language that has been modified to clarify how livestock grazing management, including managing for minimum stubble heights, would be implemented. Flexibility in the application of stubble heights that would be possible is also described. Allotment Management Plan preparation is also discussed in greater detail in the same section in the PRMP.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

SPECIFIC RANGE ISSUES:

STUBBLE HEIGHT

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3 As you are aware our range is a spring range only. Stubble Height was first mentioned in the spring or early part of 1991. We believe that before this is included in a ten year plan more study and consideration should be done. This requirement is not satisfactory to our allotment. It is not specifically tailored to the individual range conditions nor does it take into account the rest or deferred rotation grazing. This issue should be in the individual AMP Plans. Our BLM is used a month in the spring and passed through all of ten days in the fall.

ALLOCATION OF NEW OR ADDITIONAL FORAGE

4 If there is an increase or decrease in available forage we believe, as permit holders, we should be involved in any and all decision making to solve the issue of AUM adjustment.

5 Taylor Park believes that our existing AMP is being largely ignored by this RESOURCE Management Plan. We ask "What good is our AMP if it isn't being followed? It was mandated in 1980 in the EIP and we believe it should be followed first.

RANGE READINESS

6 We strongly believe that range readiness should be based on OUR individual allotments. Readiness should be based on histories of use and prior seasons and should consider the type of management occurring on the allotment. The Pool OPPOSES using USFS guidelines for readiness due to the drastic differences between elevations and climate of our BLM allotment of Cabin Creek and Alder Creek.

Lastly, we wonder if the cost of this planned impact statement could have been done in a less costly way and the money not spent on this book used for the issues included.

Thank you for your careful review of these concerns. Taylor Park as been commended for its care of the range many times in the last two to three years, rest assured we intend to continue to do so. We will support and cooperate to the fullest should application of multiple-use principles with appropriate regard for the desires and need of the Taylor Park permits.

Sincerely yours,

TAYLOR PARK CATTLE POOL ASSOCIATION

David McLain
President

Donna Phelps
Secretary-Treasurer

Minimum stubble heights are recommended in order to achieve the resource conditions in the Standard Management section for Livestock Grazing Management, and in prescriptions for certain of the Management Units in the PRMP. In riparian areas, achieving these levels would help maintain plant vigor and production, provide for quality livestock forage and wildlife habitat, provide a minimum of plant residue to trap sediment during high flows, buffer or reduce the energy of high flows, reduce erosion, and protect streambanks. The implementation of stubble heights could occur within a variety of grazing systems, including non-traditional or rest or deferred rotation patterns.

4. Please refer to numbered item 4 on page 4-8, and to the last paragraph in the left-hand column on page 4-9 in the PRMP for language regarding adjustments in grazing preference. Permittees would be involved in grazing management decisions reached by BLM through consultation, cooperation, and coordination.
5. The RMP process, in most cases, is not Allotment-specific. Records show that objectives in the referenced Allotment are currently being met, and even some objectives addressed in this RMP have been met.

Please refer to the response to comment 9 of letter 35, and to page 3-3 of the DRMP for discussions of budget needs to implement recommendations. The increase mentioned on page 3-3 of the DRMP would apply to the PRMP as well. Please also refer to the discussion of activity plans under Livestock Grazing Management in the STANDARD MANAGEMENT section of Chapter Four in the PRMP.

Also, please refer to page 2-5, Chapter Two, of this PRMP for a discussion of the relationship of this PRMP and the April, 1980, Draft and the September, 1980, Final Gunnison Basin Livestock Grazing Environmental Impact Statement.

6. Application of range readiness (refer to Appendix B, DRMP and PRMP for criteria) has been clarified and expanded upon. Range readiness criteria would be used when earlier turnout dates than authorized are requested, and in extenuating circumstances, such as drought situations or serious wildfire. Please see the subheadings "Grazing Administration" and "Monitoring and Range Readiness" in the Livestock Grazing Management section of Standard Management in the PRMP for more information.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 70

1. Please see the response to comment 6 of letter 69.
2. Please refer to the response to comment 28 of letter 50.
3. Please refer to pages 4-5 and 4-9 in the PRMP for revised language clarifying how new available forage would be allocated for wildlife and livestock grazing management purposes. Also, on page 4-9 in the PRMP, forage allocation procedures in 43 CFR 4100 (specifically, see 43 CFR 4110.3) would include considering using new available forage to increase active use (AUMs).

June 11, 1991

Mr. Alan L. Kesterke, District Manager
 Montrose District
 Bureau of Land Management
 2505 South Townsend Ave.
 Montrose, CO 81401

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Mr. Barry A. Tollefson, Area Manager
 Gunnison Basin Resource Area
 Bureau of Land Management
 216 N. Colorado Street
 Gunnison, CO 81730

RE: GUNNISON RESOURCE AREA DRMP/DEIS

Gentlemen:

- 1 The Iola Powderhorn Stockgrowers Assn. (hereafter "The Pool") hereby submits its written comments on the DRMP/DEIS for the Gunnison Resource Area. The proposed plan or parts of it may deny or alter the use of these properties by our membership by adoption of the proposed Range Readiness Criteria as determined by the USFS and by the restricted stubble height.
- 2 The Pool strongly objects to the Proposed Plan's adoption of the USFS, Region 2 Criteria for range readiness. Range readiness should be determined by joint range tour on each individual allotment by BLM personnel and permittees. The elevation of most BLM lands allows earlier turn out due to lower, warmer climatic conditions. Most Forest Service lands used by The Pool permittees are at 9500 feet or higher, which does not allow grasses ready for grazing as early as at lower level BLM lands.
- 3 The requirement of a minimum stubble height is not specifically fitted to individual range conditions existing in any given allotment in the resource area. Nor does it take into account grazing patterns of use such as rest or deferred rotation. These patterns often result in heavy use for a short time followed by significant rest periods. This type of grazing and rest rotation has been cooperatively agreed upon by BLM and permittees and has been termed a workable solution to the enhancement of these lands by BLM and permittees.
- 3 There is a provision to guarantee forage allocations "at current level" to wildlife p 3-104, at the same time forage allocations "at current levels" for livestock is subjected to a very strenuous list of conditions that don't apply to wildlife. All classes of grazing herbivores impact and influence

The forage allocation methods, considerations, and procedures referenced above in this response (specifically in the paragraph immediately before the subheading "fences" on page 4-9 in the PRMP) are very similar to current procedures. Any incentives that have existed in the past to continue rangeland improvements would not be diminished as a result of implementing the recommendations in this PRMP.

Also, please see the response to comment 50 of letter 38. The monitoring conducted by the BLM has shown that elk spend only a small proportion of their time in riparian areas as compared to cattle. The majority of use by elk in riparian areas occurred during the winter when banks are frozen and vegetation is dormant, as compared to livestock that utilize riparian areas during the spring and summer, when banks are muddy and plants are beginning growth.

4. Please refer to page 2-5, Chapter Two, of this PRMP for a discussion of the relationship of this PRMP and the April, 1980, Draft and the September, 1980, Final Gunnison Basin Livestock Grazing Environmental Impact Statement.
5. Please refer to the response to comment 18 of letter 50 for information regarding winter range mapping.

Please also refer to the response to comments 11, 15, 16, and 20 of letter 38, regarding carrying capacities and the relationship between CDOW and BLM regarding requests for reductions in population numbers.

Also, please refer to the response to comment 13 of letter 50 for information regarding the manner in which elk population estimates are calculated during the year. Since 1983 the CDOW has been trying to hold elk numbers down to their long range herd goal of 9,000.

Recommendations were made in the DRMP to hold game populations within habitat carrying capacity on public lands (please see Table A-3, page A-1, in the DRMP). As a result of our monitoring studies, our primary concerns are with the long range herd goals for deer. In Table A-3, page A-1, in the DRMP BLM recommends lower interim herd goals for deer until shrub production and vigor increases.

The BLM recognizes the conflict of elk using private lands during critical times of the year. We are also aware that CDOW long range herd for GMUs include all lands in the GMUs, not just public, or FS, or state lands. The BLM is confident that, under the correct circumstances, the recently initiated Habitat Partnership Program will lead to resolutions of some of these conflicts in the Planning Area.

6. Including the information in the RMP mentioned in the comment would not contribute to making decisions or analyzing consequences.

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Mr. Alan L. Kesterke, District Manager
 Mr. Barry A. Tollefson

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- 3 the vegetative and riparian resource, and equal responsibility for grazing these areas should apply to livestock and wildlife.
- 3 The requirement placed on livestock to maintain a 2 1/2 inch minimum stubble height throughout the grazing season seems unreasonable when there is no stubble height requirement on wildlife.
- 4 The Pool suggests that sage brush treatments as promised in the EIS and AMP of 1980's should be carried out and that by such action both domestic livestock and wildlife would tend to graze developed forage not lying in the riparian areas.
- 5 Members of The Pool feel the allocation of 36% of Critical Winter Range for Wildlife on private lands is an encroachment upon private lands and a detriment to the livestock operator's management practices on his privately owned lands. BLM should require the DOW to manage their herds to meet BLM objectives rather than DOW objectives. Private livestock operators are required to manage their herds in this manner and are not allowed to use range allowed for wildlife. It then appears, DOW should maintain herd numbers that do not require use of private lands for winter range.
- 6 Many statements in the RMP are biased against livestock and in favor of wildlife and recreation. We would like to have equal treatment under the Multiple Use Act.
- 6 The Pool would like to see a break down of dollars returned to BLM from other users, for example recreation and wildlife as compared to the dollars returned from grazing fees from livestock on BLM lands.
- 7 The designation of acreages from 4,565 up to 9,562 acres as ACEC in the South Beaver Creek area seems excessive to protect 185 acres containing colonies of Skiff Milkvech plant. We feel this designation should be re-evaluated to determine if the designation of such a large area is not in conflict with other uses such as recreation grazing, mining and timber harvest under the multiple use concept in this area.

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June 11, 1991

Mr. Alan L. Kesterke, District Manager

Mr. Barry A. Tollefson

The Iola Powderhorn Stockgrowers Assn. endorses comments already submitted by the Gunnison County Stockgrowers Assn. and also comments by John Scott of the Soil Conservation Service.

We appreciate the opportunity to comment on the proposed DRMP/DEIS and stand ready to cooperate in further planning prior to the final plan.

Judy Bates

Yours very truly,
IOLA POWDERHORN STOCKGROWERS ASSN.

Wendell A. Wain

Ellen J. Sammons

Edward D. Howard

Pat McKee

Lawrence E. Phelps

7. Please see the response to comment 8 of letter 38. The BLM is recommending the 4,565 acre Management Unit E-8, in the Preferred Alternative in the DRMP, for ACEC designation in the PRMP (see the prescription for Management Unit 8 in Chapter Four of the PRMP).

June 13, 1991

Mr Alan Kesterke, District Manager
Montrose District
Bureau of Land Management
2505 South Townsend Ave.
Montrose, CO 81401

Mr. Barry A. Tollefson, Area Manager
Gunnison Basin Resource Area
216 N. Colorado Street
Gunnison, CO 81230

RE: GUNNISON RESOURCE AREA DRMP/DEIS

Gentlemen:

My name is Mike Howard, a permittee running livestock on BLM lands in the Gunnison Basin Resource Area. I would like to offer written comments regarding the DRMP/DEIS for the Gunnison Resource Area. The proposed plan directly affects my ability to continue to operate my ranch using BLM lands. This will affect my overall ranching operation tremendously.

1 The proposal in this DRMP/DEIS to adopt the Forest Service criteria for range readiness should be re-evaluated and range readiness should be determined on an individual basis with tour by permittee and BLM personnel to determine the readiness each year.

2 Overall minimum stubble heights are not tied to individual range conditions in any given allotment in the basin. It does not give consideration to grazing patterns and historical use, such as rest or deferred rotation, which at times allows a significant period of rest from grazing. These plans are designed to allow heavier use for a short period and then rest period. These lands have been cooperatively managed by permittees and BLM in this fashion and has brought about a workable solution to enhance these lands over a period of time, while not working a hardship on permittees by allowing no grazing.

3 The required minimum stubble height is blatantly absent from the provision to allocate forage "at current level" to wildlife § 3-104, but is given great emphasis in allocating forage "at current level" for livestock. Since grazing whether by livestock or wildlife impacts and influences the vegetative and riparian resource, equal opportunity to graze these areas should apply to all grazing herbivores. The requirement of 2 1/2 inch minimum stubble height throughout the season does not apply to wildlife, therefore it should not apply to livestock.

Responses to letter 71

1. Please see the response to comment 6 of letter 69.
2. Please refer to the response to comment 28 of letter 50.
3. Please refer to pages 4-5 and 4-9 in the PRMP for revised language clarifying how new available forage would be allocated for wildlife and livestock grazing management purposes. Also, on page 4-9 in the PRMP, forage allocation procedures in 43 CFR 4100 (specifically, see 43 CFR 4110.3) would include considering using new available forage to increase active use (AUMs).

The forage allocation methods, considerations, and procedures referenced above in this response (specifically in the paragraph immediately before the subheading "fences" on page 4-9 in the PRMP) are very similar to current procedures. Any incentives that have existed in the past to continue rangeland improvements would not be diminished as a result of implementing the recommendations in this PRMP.

Also, please see the response to comment 50 of letter 38. The monitoring conducted by the BLM has shown that elk spend only a small proportion of their time in riparian areas as compared to cattle. The majority of use by elk in riparian areas occurred during the winter when banks are frozen and vegetation is dormant, as compared to livestock that utilize riparian areas during the spring and summer, when banks are muddy and plants are beginning growth.

4. Please refer to the response to comment 18 of letter 50 for information regarding winter range mapping.

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4 I also object to the allocation of private land as critical winter range for wildlife and believe the DOW must be required to manage their herd by reduction of numbers or whatever it takes to maintain the BLM objectives rather than the BLM manage lands to fit the DOW objectives. It appears that this whole document is strongly biased in favor of wildlife and recreation.

5 What is the break down of dollars returned from other uses as compared to dollar return from grazing fees?

I support the statements of the Gunnison County Stockgrowers Assn., the Iola Powderhorn Stockgrowers and John Scott of the Soil Conservation Service that have already been submitted.

I thank you for the opportunity to comment and am willing to cooperate in management of BLM and all other public lands under the Multiple Use Concept.

Tours very truly,

Mike Howard
Mike Howard

Please also refer to the response to comments 11, 15, 16, and 20 of letter 38, regarding carrying capacities and the relationship between CDOW and BLM regarding requests for reductions in population numbers.

Also, please refer to the response to comment 13 of letter 50 for information regarding the manner in which elk population estimates are calculated during the year. Since 1983 the CDOW has been trying to hold elk numbers down to their long range herd goal of 9,000.

Recommendations were made in the DRMP to hold game populations within habitat carrying capacity on public lands for elk (please see Table A-3, page A-1, in the DRMP). As a result of our monitoring studies, our primary concerns are with the long range herd goals for deer. In Table A-3, page A-1, in the DRMP, BLM recommends lower interim herd goals for deer until shrub production and vigor increases.

The BLM recognizes the conflict of elk using private lands during critical times of the year. We are also aware that CDOW long range herd for GMUs include all lands in the GMUs, not just public, or FS, or state lands. The BLM is confident that, under the correct circumstances, the recently initiated Habitat Partnership Program will lead to resolutions of some of these conflicts in the Planning Area.

5. Please see the response to comment 6 of letter 70



June 14, 1991

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Alan L. Kesterke
Area Manager
Gunnison Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

Re: Draft Gunnison Resource Area Resource Management Plan and Environmental Impact Statement

Dear Mr. Kesterke:

These comments are submitted on behalf of both American Rivers and the Colorado Environmental Coalition.

American Rivers

American Rivers, formerly named the American Rivers Conservation Council, is a national, public interest not-for-profit corporation with more than 16,000 members nationwide. American Rivers is the only national conservation organization dedicated exclusively to the preservation of free-flowing rivers. In its eighteen-year history, American Rivers has worked intensively to protect rivers under the federal Wild and Scenic Rivers Act and has actively assisted states and local groups with their river conservation efforts.

American Rivers has worked extensively with the Bureau of Land Management ("BLM") since 1987 in its planning efforts for the river resources on the public lands. American Rivers has assisted the planning staff in Washington to clarify administrative direction for consideration of potential wild and scenic rivers in BLM's resource management planning, and has reviewed and commented on numerous BLM plans. American Rivers has filed to date six Protests of Resource Management Plans. Each Protest has alleged, *inter alia*, that the individual RMP failed to comply with the Wild and Scenic Rivers Act and explicit agency administrative requiring that BLM study potential wild and scenic rivers and provide interim management prescriptions for those rivers found eligible. On June 4, 1990, the Director decided all four then pending Protests and agreed the subject RMPs failed to comply with the Wild and Scenic Rivers Act and advised the affected State Directors that additional planning was required to

Responses to letter 72

1. Please refer to page 1-9 and Table 1-6 on page 1-12 in the DRMP for a discussion of the review of other streams conducted by our interdisciplinary team in the Planning Area for Wild and Scenic potential. A complete list of these other streams has been added as Attachment 2 in Appendix I of the PRMP, along with rationale as to why they were determined not to be eligible segments. Regarding Cebolla and Tomichi Creeks, BLM found that both these streams lacked any outstandingly remarkable features. The BLM manages no land along the Taylor River, and no portion of the Taylor River is located in the planning area.

2. The BLM guidance requires that eligible segments be analyzed for potential impacts to outstandingly remarkable features in the event non-designation recommendations are made. Accordingly, the potential impacts to outstandingly remarkable features as a result of not recommending the eligible Segment A of The Lake Fork of The Gunnison River for Wild and Scenic designation are addressed in the DRMP on pages 4-10, 4-36, and 4-70, for Alternatives A (Continuation of Current Management), C, and E (Preferred Alternative), respectively. The impacts of the no-designation recommendation on these features are also contained in Chapter Five of the PRMP.

3. Please refer to the response to comment 1 of this letter.

4. The CDOW opinion referred to in the comment pertains to the Lake Fork "from Lake City to Blue Mesa Reservoir" and is not specifically applicable to Segment A. Our reference to fisheries is based on our grouping all aquatic ecosystem concerns under the heading of fisheries. We were not solely referring to fishing success of recreationists. We specifically analyzed the significance of the cutthroat trout population in relation to the river's values. The cutthroat trout is not a USF&WS listed species, but is a

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Alan L. Kesterke
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comply with established requirements.¹

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American Rivers members live near, use and benefit from the resources of the Gunnison Resource Area ("GRA"), including its rivers and associated landscapes.

Colorado Environmental Council

The Colorado Environmental Council ("CEC") is a not-for-profit conservation organization based in Denver, Colorado.² The mission of CEC is to achieve the conservation of natural resources and the preservation of environmental values, primarily in Colorado, through coordinating efforts of the environmental community. CEC presently has more than 1,500 individual members and 37 member groups whose total membership exceeds 50,000 individuals. CEC's professional staff and members work on a variety of public lands issues in Colorado, including the protection of free-flowing rivers.

CEC Rivers members live near, use and benefit from the resources of the Gunnison Resource Area ("GRA"), including its rivers and associated landscapes.

GENERAL COMMENTS

Section 5(d) of the Wild and Scenic Rivers Act, 16 U.S.C. section 1271 *et seq.*, requires all federal agencies to consider potential national wild, scenic and recreational river areas in all planning for the use and development of water and related land resources. 16 U.S.C. section 1276(d). The planning responsibility imposed by section 5(d) plainly requires the BLM to assess the values of potential wild and Scenic Rivers during the preparation of resource management plans pursuant to the FLPMA. Recognizing that responsibility, BLM Manual Section 1623.41A2d identifies wild and scenic river recommendations as a possible determination to be made in such plans.

To provide further guidance for fulfilling BLM's planning responsibilities for potential wild and scenic rivers, the agency's Washington office on July 23, 1987 circulated Instruction Memorandum No. 87-615, containing draft guidelines for identifying, evaluating, and protecting potential wild and scenic

¹ Since that date, the Director has remanded for further planning one of the other RMPs which American Rivers had Protested; one Protest remains pending.

² CEC's office is located at 777 Grant Street, Suite 606, Denver, Colorado 80203.

Alan L. Kesterke
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rivers on BLM lands. That guidance was promulgated by the Director in final form in Instruction Memorandum No. 87-670 and the attached Guidelines for Fulfilling Requirements of the Wild and Scenic Rivers Act (the "Guidelines"), issued September 8, 1988 and renewed annually. In addition, the Director included a "Wild and Scenic River Act Plan Review Procedures Summary" ("Procedures Summary") with his June 4, 1990 Memorandum to State Directors concerning the resolution of existing American Rivers' protests that clarified certain elements of the study process.

Under the directions established in the Guidelines, planning for potential wild and scenic rivers on BLM lands follows a relatively straightforward, three-step procedure. Each BLM resource management plan is to:

- (1) evaluate the eligibility of potential wild and scenic rivers within its planning area for inclusion in the National Wild and Scenic Rivers System in accordance with the criteria set forth in Section 1(b) of the Wild and Scenic Rivers Act (i.e., whether the river is free-flowing and possesses one or more "outstandingly remarkable" values);
- (2) determine the appropriate classification ("wild," "scenic," or "recreational") for rivers found to be eligible;
- (3) assess the suitability of such rivers for inclusion in the national rivers system, based upon the public values and uses that would be enhanced or foreclosed by such protection, the degree of public, state and local interest in designation, and practical concerns regarding costs and feasibility of administration.

Guidelines, Section VIII, at 9-12.

Until a final decision is reached by the agency and, for recommended rivers, by Congress, BLM is to protect river resource values and characteristics through specific management prescriptions established in specific or programmatic interim management plans. Guidelines, Section IV.C., at p. 7; Section IX, at p. 20.

I. Comments Concerning Eligibility

A. Scope of study

The GRA planners inexplicably restricted the scope of their evaluation of free-flowing streams within the resource area to the Lake Fork of the Gunnison River. E.g., Draft at 2-34. There

species of special concern to the state. This population is not native to the area but an experiment in reintroduction being carried out by the CDOW. At this point they are not certain that a portion of Segment A can support and maintain a viable population of this species. For these reasons we did not consider the aquatic ecosystem in general, or the cutthroat trout population specifically, as an outstandingly remarkable feature. The occurrence of Bald Eagles mainly occurs in Segment B of the river, which was found to be not eligible because it is not free flowing.

5. In our segmentation of the Lake Fork, we chose Wager Gulch as the cutoff point for Segment A because that is the point where land ownership changed from predominately federal to predominately private. Also, the number of structures, diversions, disturbances and impacts increase substantially downstream from that point. Also, as is referenced in the comment, no outstandingly remarkable features were identified below Wager Gulch. After considering these factors, BLM is using the segment divisions contained in the DRMP.
6. Upon reexamination of eligibility determinations, BLM continues to determine that Segments B and C, as defined in Attachment I of the DRMP and PRMP, are not eligible for inclusion into the National Scenic and Wild Rivers System (NWSRS).
7. In our analysis of outstandingly remarkable resource values along streams in the Planning Area, BLM adhered closely to the evaluation criteria identified in the Act and BLM guidance. This included a consideration of scenic, recreational geological, fish and wildlife, historic, cultural and other similar values. Based on our judgement, the only segment that met the eligibility requirements is Segment A of the Lake Fork.

We agree that the Gunnison Resource Area has a rich diversity of resource values, but these rich resources are present on many lands in the southern Rocky Mountains, thus reducing the potential for these values to be even regionally significant. The BLM is aware of the resources referenced in the comment, and these were considered in our eligibility analysis. The analysis factors for ACEC identification, and those for Wild and Scenic River eligibility determination are applied to lands and waters for very different purposes. These are two very different and unique designations that require examination of different analysis factors and application of different management guidelines. The bighorn sheep habitat in the Cebolla Creek and Lake Fork areas was not determined to be an outstandingly remarkable feature when evaluated by the wild and scenic river criteria.

8. Thank you for your in-depth analysis of the referenced suitability determination factor. The referenced text in Appendix I in the DRMP has been changed. We did not intend to communicate that the Segment A is not suitable because the scenery is not "river-dependent". The conclusion we reached and were attempting to communicate, regarding this factor, is that other management tools are currently available to afford the required degree of protection for the values in Segment A, including the scenic values. Appendix I, page I-10, in the PRMP clarifies this language.

This recommendation of non-designation and suitability would not diminish in any fashion BLMs' commitment to manage and protect the values in Segment A.

9. Thank you for the references on interim management of streams found eligible and suitable for designation into the NWSRS. We obtained a copy of the documents. Had the Preferred Alternative, or the PRMP, contained a "suitable" determination and a recommendation for designation regarding Segment A or any other stream, interim management for the segment or stream would have been included. Please refer to Appendix I in the DRMP or PRMP for existing management tools that would provide for protection of values in Segment A.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

No decisions are actually made in the DRMP. Decisions about the management of resources in this area will be made in the Record of Decision that accompanies the Approved RMP.

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1 is no suggestion that any other stream on the resource area was evaluated for its potential as a national wild and scenic river. Nor is there any rationale provided for the planners' apparent conclusion that the Lake Fork is the only stream which may qualify for inclusion in the national rivers system and that no other stream in the GRA may be eligible for such designation. The planning team must correct this significant planning omission as it prepares the Final RMP.

For example, the Draft does identify several other major tributaries of the Gunnison, including Tonichi Creek, Taylor River and Cebolla Creek. Draft RMP at 2-11. Each of these streams are obvious candidates for an assessment of potential eligibility for wild and scenic status.

The Final RMP should include descriptive accounts that explain the planners rationale that other streams are not eligible. BLM planners in other resource areas are including descriptions of ineligible rivers. E.g., Draft Bishop Area RMP. American Rivers and the Colorado Environmental Coalition ("the conservation groups") have found this to be an extremely important element of RMPs. Numerous BLM planning teams are fulfilling the planning responsibilities imposed by PLPMA and the Wild and Scenic Rivers Act by conducting an eligibility assessment of all streams which flow through an individual resource area. The GRA planners should do no less.

Only through full documentation of the basis for BLM's findings can the public be assured that the agency has in fact given these streams the consideration mandated by section 5(d) of the Wild and Scenic Rivers Act, and that rivers and streams with potential as additions to the national rivers system have not been rejected on a superficial examination.

The fundamental importance of such documentation is plainly expressed in the Guidelines: "The RMP record of decision (ROD) serves as the release document for river areas, or portions of river areas/segments, determined nonsuitable for WSR river designation." Section VIII.B.1.

2 Moreover, pursuant to the National Environmental Policy Act (NEPA), the planning documents must assess the potential environmental impacts of any decision not to recommend rivers for inclusion in the national rivers system. In *California v. Block*, 690 F.2d 753 (9th Cir. 1982), the United States Court of Appeal for the Ninth Circuit held that the Forest Service is required to prepare a site-specific EIS when it decides its planning process to release potential wilderness areas for nonwilderness uses. BLM decisions not to recommend designation for potential wild and scenic rivers, like decisions releasing potential

Alan L. Kesterke
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wilderness areas, irretrievably commit the resources of such rivers and their adjacent lands, and require similar site-specific environmental analysis. Even where the BLM establishes relatively protective prescriptions for a river area in its RMP, such as an ACCR, the decision not to recommend Wild and Scenic River designation exposes the river to a continued risk of hydroelectric development that may degrade or destroy the river's free-flowing character, and to mineral development that may impair its outstanding natural values.

3 The conservation groups' concern with the depth of the planners' eligibility analysis is not a mere academic concern. In addition to identifying eligible streams, the description of outstandingly remarkable values is a central component of any suitability study. The heart of the suitability determination is a consideration of the characteristics that make a river and its corridor a worthy addition to the national rivers system. Guidelines, section VIII.A.3. That analysis is crippled if the eligibility determination is incomplete. Also, streams not found eligible are subject to management activities which may impair or even preclude their later inclusion in the national rivers system.

The conservation groups are concerned also that the planning team may have adopted a screen, either formally or informally, that resulted in the exclusion of streams of relatively small length or volume. Congress provided an expansive definition of "river" in the Wild and Scenic Rivers Act. Egg 16 U.S.C. §1286(a) ("River" means a flowing body of water or estuary or a section, portion, or tributary thereof, including rivers, streams, creeks, runs, kills, rills, and small lakes."). The wild and scenic rivers system encompasses a wide range of rivers and streams, from Alaska's vast Fortymilla River system to the North Fork Owyhee in Oregon to Louisiana's Saline Bayou River. The public lands planning activities of BLM and the Forest Service are leading to the identification of literally hundreds of rivers eligible for the national wild and scenic rivers system.

B. Depth of study

1. Lake Fork of the Gunnison River

4 The conservation groups question the basis for the determination that scenery is the only outstandingly remarkable value possessed by this river. The Colorado Division of Wildlife believes the river to possess also outstandingly remarkable fishery and wildlife values. Draft, Appendix I at I-12. There is no discussion of the basis for BLM's apparent conclusion that the Division of Wildlife is in error.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

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4 The brief reference to fisheries suggests that the planners emphasis was upon fishing rather than analysis of the diversity and importance of the fishery resource. *E.g.*, *Id.* at I-13. The presence of Colorado cutthroat trout, for example, suggests that the Lake Fork may possess outstandingly remarkable fisheries values. *Id.* at 2-18. Similarly, the occurrence of bald eagles along the Lake Fork suggest that wildlife values may be significant. *Id.*

5 The conservation groups question also the particular segmentation applied to the Lake Fork. A more appropriate division for Segments A and B would be Lake San Cristobal, rather than Mager Gulch. The apparent reason for this division point is the determination that the numerous diversions to fill streamside lakes precludes a determination that the stream is free-flowing. *Id.* at I-9. We suggest the planning team reassess this conclusion and consider whether the segment might qualify for a recreational classification. We appreciate, of course, that if there are no outstandingly remarkable values present in this segment then it would not be eligible, however, as is discussed elsewhere in these comments, we believe that the eligibility analysis conducted by the planning team was inadequate.

6 Finally, if, as we believe, additional analysis determines other significant resource values are possessed by this and other streams in the GRA, such values may also be found to be present in Segments B and C of the Lake Fork.

2. Other resource values

7 There is absolutely no suggestion that the planning team evaluated seriously numerous resource values during the course of their examination of free-flowing streams on the resource area.

The Draft discusses "Special Status Plant and Animal Species Habitat." *Id.* at 2-18, however, there is no indication that the ecological, fisheries and wildlife values discussed therein were considered as values that would qualify a stream and its corridor for inclusion in the national rivers system.

While it is impossible in the absence of documentation to evaluate the adequacy of the staff's review of other streams on the GRA, the conservation groups think it highly likely that the staff failed to evaluate all resource values. In the first place, the conservation groups find it difficult to believe that the GRA, with its rich and diverse resource values, would not include a single stream (other than the scenic values in Segment A of the Lake Fork) with regionally significant scenic, recreational, geologic, wildlife, historic, cultural, ecological

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or botanical values.

7 The conservation groups' experience with other federal land management plans across the country has demonstrated that agency planners frequently fail to fully consider all resource values which could qualify streams on their forest. For example, planning teams sometimes ignore, or merely give cursory acknowledgment to, the fact that ecological values may qualify a river for inclusion in the national rivers system. See U.S. Departments of Interior and Agriculture, National Wild and Scenic Rivers System: Final Revised Guidelines for Eligibility, Classification and Management of River Areas ("Interagency Guidelines"), 47 Fed. Reg. 39454, 39457 ("In addition to the specific values listed in Section 1(b) of the Act, other similar values, such as ecological, if outstandingly remarkable, can justify inclusion of a river in the national rivers system.").

Many of the resource values which led to the determination of relevance and importance of particular ACECs would also support a determination of eligibility for free-flowing streams. *E.g.*, Draft, Appendix H. For example, Cabolla Creek ACEC is found to possess "regionally and nationally significant [bighorn sheep] habitat." *Id.* at H-7. Remarkably, Lake Fork Canyon is found to possess significant regional recreation values, historic railroad camps, high quality trout fishing, yet none of these significant resource values are even mentioned in the wild and scenic study. *Id.* at H-6.

II. Suitability

The conservation groups commend the planning team for the breadth of their suitability analysis. Few DRMPs have included such a detailed discussion of a stream's suitability.

8 Nonetheless, the planners have applied an entirely inappropriate screen to determine that Segment A of the Lake Fork is ineligible. The planners have included that the scenic values of the river are not "river dependent" and that, therefore, the stream would not make a worthy addition to the national rivers system. *Id.* at I-10.

Thus, although the resource specialists determined that the river possesses outstandingly remarkable scenic values, a decision was made that these values are not "river dependent."

The perspective that an outstandingly remarkable value present must be "river dependent" is not found within the Wild and Scenic Rivers Act or any agency directive. The Act addresses itself to "certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable

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8 ... values." 16 U.S.C. § 1272(b). The Act does NOT require that a river be free-flowing and possess an outstandingly remarkable value that is river dependent; rather the Act speaks to free-flowing rivers with outstandingly remarkable values within the river's immediate environment. The study states that "[t]he scenery is outstanding in the river corridor but the river plays only a small part in this scenic quality." Id. at 1-10. Congress made the determination that a river value is sufficiently related to the river if it is present within one-quarter mile of the river. There is no statutory or administrative support for BLM's additional requirement that an outstandingly remarkable value within one-quarter mile of the river must also meet a test of whether it is "river dependent."

The consequence of applying this inappropriate "river dependent" screen is most obviously significant with respect to BLM's determination that an eligible segment is not suitable, however, the conservation groups are concerned that this inappropriate screen may have infected the entire analysis of outstandingly remarkable values possessed by other streams in the GRA, including wildlife and ecological values.

III. The Gunnison RMP Fails to Establish Detailed Management Standards

In order to protect the resource values and character of its potential wild and scenic rivers until a decision is reached regarding their designation, BLM's Guidelines require agency planners to establish detailed management prescriptions. The Guidelines state: "... the RMP must prescribe the protection (interim management prescriptions) to be provided for the river and adjacent public land area pending the suitability and, when necessary, subsequent action by the Congress." Guidelines, Section VIII.A.3.a., at p. 11 (emphasis added).

9 The Guidelines address in detail the scope of management prescriptions that should be adopted:

Specific management prescriptions for river corridors identified from the NRI list, or otherwise identified for study, should provide protection in the following ways:

1. Free-flowing values. The free-flowing characteristics of such identified river segments cannot be modified to allow stream impoundments, diversions, channelization, and/or rip-rapping to the extent the BLM is authorized under law.
2. River values. Outstandingly remarkable values of the identified river segment or area must be protected (subject

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9 to valid existing rights) and, to the extent practicable, enhanced.

3. Classification impacts. Management and development of the identified river and its corridor cannot be modified, subject to valid existing rights, to the degree that its eligibility or classification would be affected (i.e., its classification cannot be changed from wild to scenic, or scenic to recreational).

Guidelines, IX, B., at 1-20.

The conservation groups recognize that the decisions in the Draft do not require any interim management prescriptions. If, however, as we believe, rivers are found eligible and/or suitable in the final, we suggest that the planning team contact the Bishop Resource Area in California or the Three Rivers Resource Area in Oregon. Both of these Resource Areas have included excellent management prescriptions in their Draft RMPs.

We trust these comments assist the planning team complete and improve the RMP. Please do not hesitate to communicate with us if you have any questions concerning any of the matters set forth above. American Rivers and the Colorado Environmental Coalition look forward to working closely with the Gunnison Resource Area.

Sincerely,

Thomas J. Cassidy, Jr.
Public Lands Counsel


Todd Robertson
Colorado Environmental Coalition

cc: Todd Robertson

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES



GUNNISON COUNTY
ELECTRIC ASSOCIATION, INC.

P.O. BOX 180

GUNNISON, COLORADO 81230

(303) 641-3520

June 13, 1991

Barry Tolleson, Area Manager
Bureau of Land Management
216 North Colorado
Gunnison, Co 81230

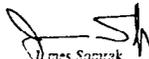
RE: BLM Resource Management Plan

Dear Mr. Tolleson:

1 No east-west electric line right-of-way corridor was identified in the Powderhorn Valley. We request this not preclude the granting of a future electric line right-of-way that may be needed if future development does occur in the general areas of Townships 46 ad 47 North, Ranges 1, 2 and 3 West, NMPM.

Thank you for the opportunity to comment on the Resource Management Plan.

Sincerely,


James Somrak
General Manager

JS:RS/mf

Responses to letter 73

1. Unless an area is closed to the location of rights-of-way, public lands would be open to the consideration for these land uses. Corridor designation means that applicants for linear rights-of-way would be seriously encouraged to consider these corridors.

RECEIVED

JUN 14 1991

BLM-GUNNISON R.A.

"Owned By Those We Serve"



June 14, 1991

Mr. Barry Tolleson
Bureau of Land Management
216 North Colorado
Gunnison, Colorado 81230

Dear Mr. Tolleson:

1 I am writing you in reference to the new Gunnison Resource Area Resource Management Plan and Environmental Impact Statement. Our Club supports this draft and feels it is necessary. As you may know we are also involved in the "Hartman Rocks" planning for recreational purposes. We decided to become actively involved in this because we were afraid it may become closed to our use. Our only remaining concern of this issue is Arden Anderson's determination to close much of the area to 4-Wheel drive use. The only apparent damage we see are the washouts at the west side above the fence. We would welcome some improvements there. We also appreciate your cooperation with us and look forward to serving the BLM in the future.

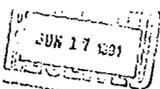
Yours truly,

Roy Duncan
President Blue Mesa 4-Wheelers

Responses to letter 74

1. Thank you for your support of the DRMP. The Preferred Alternative does not propose to close any of the BLM-managed lands near Hartman's Rocks to 4-wheel drive use. There is an area of public land southwest of Hartman's Rocks where vehicle use would be restricted to designated roads to avoid impacts to a sensitive plant species.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES



June 17, 1991

75

Dear Mr. Barry Tolleson:

In reading the RMP book, I find you list Road Beaver Creek as part of the 187 miles of fishing streams in your resource area. I'm having difficulty finding any sense to this because:

1. There are many years, in late summer, there is hardly enough water in places to even a fish, let alone support them.

2. At times there are several places the water is underground and doesn't surface for long distances.

3. The road the B.L.M. put in to the Pole Patch timber cut went right up the bottom of this riparian area and was of no value to anyone including the B.L.M. and the timber sale. I fought putting this road in, but no one paid any attention to someone who had spent 50 years in this area.

Sincerely,
Ted Wilson

NICOLAS BROTHERS PARTNERSHIP

556-C530 Rd., Montrose, Colorado 81401

76

June 14, 1991

Mr. Alan I. Kesterke, District Manager
Montrose District
Bureau of Land Management
2505 South Townsend Avenue
Montrose, Colorado 81401

Mr. Barry A. Tolleson, Area Manager
Gunnison Basin Resource Area
Bureau of Land Management
216 North Colorado Street
Gunnison, Colorado 81230

Mr. Bill Pottosky, RMP Team Leader
Montrose District
Bureau of Land Management
2505 South Townsend Avenue
Montrose, Colorado 81401

RE: COMMENTS ON GUNNISON RESOURCE AREA TEAM RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT DRMP/DEIS.

Gentlemen:

The Nicolas Brothers Partnership (hereafter "N.B.") hereby submits its written comments on the DRMP/DEIS for the Gunnison Resource Area. As you are aware, the N.B. was founded in 1920 and for nearly a century has been an active representative of the livestock industry in the Gunnison watershed. N.B. and through its membership, represents private individuals, families, partnerships, corporations and other entities which own or use lands, water rights, livestock, grazing permits and leases in the area covered by the plan. As presently proposed, the Resource Management Plan or portions of it may deny or alter certain of these members the use of these various properties. As such, the N.B. represents a membership that is or may be affected by approval of the proposed Resource Management Plan. Should it become necessary, N.B. has standing to protest approval of this RMP under 43 CFR 2610.5-2 (1990).

These comments were prepared after extensive review of the DRMP/DEIS by a select committee within the N.B., which comments were then reviewed by the Board of Directors of the N.B. prior to submission to the PLM. The PLM Area Manager made available a number of additional detailed supporting materials through the cooperation of the RMP Team Leader. Their assistance in that regard is appreciated.

Responses to letter 75

1. Fish were observed in Road Beaver Creek on BLM land during a survey on October 21, 1983, and several times since then. While Road Beaver is not a prime recreational fishery and does not have the potential to be such, it is BLM policy to manage riparian areas in a healthy and productive condition and to enhance fisheries. Currently, Road Beaver riparian zone is not productive in terms of livestock forage or wildlife habitat when compared to its potential. Improvement of the riparian area is a major step to enhancing the fishery.

Responses to letter 76

- 1 through 41. Please see the responses to comments 1 through 41 of letter 50, as these two letters are nearly identical.
42. The description of the Management Unit 1 in the PRMP notes that the lands south and west of Lake City also contain summer range for domestic sheep grazing.
43. The concern expressed on page 3-110 in the DRMP deals with incompatible recreation, mining, and livestock grazing land use mixes. In addition, because of shallow soils, short growing seasons and harsh weather conditions, alpine tundra ecosystems are fragile in nature and susceptible to impacts from a variety of uses. Some of these uses include, but are not limited to, recreation, grazing, and mining. The recommended management in the PRMP attempts to mitigate the potential impacts that could occur to the tundra from these various uses.
44. Please see the response to comment response 8 of letter 60, and 38 of 50. Documented research indicates that the meaning and intent of the statement in the comment is valid, and the BLM has included it in the PRMP. Research by Spraker (1990) indicates that several viral diseases of domestic sheep and cattle may be transmitted to bighorn sheep, including bluetongue (BT), contagious ecthyma (CE), bovine respiratory syncytial virus (BRSV), parainfluenza type 3 (PI-3), ovine progressive pneumonia (OPP), caprine arthritis/encephalitis (CAE), scrapie, bovine virus diarrhea (BVD), and ulcerative dermatosis (UD). Of these BT, CE, BRSV, and PI03 have been diagnosed in bighorn sheep (Spraker 1990).

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

8. The Nicolas Brothers would like to make some changes as follows:

Page 3-110, MANAGEMENT UNIT.

76

The Nicolas Brothers would like Paragraph two, sentence number one changed to read as follows: Fragile high country forests, important mining era historical resources, heavy recreation visitation, quality values and grazing.

Paragraph two, last sentence: The Nicolas Brothers want this sentence changed to read: and bighorn sheep habitat as sheep grazing.

Paragraph four, first sentence: The Nicolas Brothers would like to know how grazing detrimentally affects the fragile tundra ecosystems receiving heavy recreational use. We challenge this statement and would like this phrase deleted.

Paragraph four, last sentence: The Nicolas Brothers challenge this statement and want it deleted. According to Veterinarian sources, it is impossible for domestic sheep to infect/transfer disease or any infection to bighorn sheep.

Page 3-111, MANAGEMENT UNIT

Paragraph two: The Nicolas Brothers would like the second sentence changed to read as follows: Providing a diversity of recreation opportunities, including interpretation, while protecting important historic, grazing permits, scenic and natural values would be emphasized within the Unit.

Page 3-112, LIVESTOCK GRAZING MANAGEMENT.

The Nicolas Brothers challenge this statement and would like to know how livestock grazing along Henson Creek and the North Fork of Henson Creek to Lake City would in any way affect fishery and streamside conditions.

Page 3-116, MANAGEMENT UNIT E-5 (REDCLOUD ACEC).

The Nicolas Brothers would like paragraph number one, sentence number five, changed to read as follows: Other features within the Unit are highly scenic visual resources, livestock grazing and bighorn sheep habitat.

Paragraph number one, sentence number seven: The Nicolas Brothers protest against and challenges this statement. According to sources at the local Soil Conservation office, an environmental study was recently made in the state of Utah to determine the possibility of destroying the butterfly herein described. It is our understanding that the butterfly cannot survive without the excrement left by livestock. We want "and trampling of habitat of the Uncompahgre fritillary butterfly by domestic sheep" deleted from that sentence and paragraph.

45. The sentence "Livestock grazing would continue to be authorized in the unit within the capabilities of the ecosystems involved." has been added to the Livestock Grazing Management paragraph in Management Unit 1 in the PRMP.
46. The area along Henson Creek from the North Fork of Henson Creek to Lake City is not considered suitable for grazing due to the topography and sparse vegetation, except for the vegetation in the narrow riparian area. Utilization of the vegetation by domestic livestock could place maintenance of the fishery in jeopardy. This vegetation is important to the fishing in terms of food and cover. Insects, both aquatic and terrestrial, need vegetation to exist. Woody material entering the stream provides fish cover and habitat for aquatic insects. In addition, the streamside vegetation provides shading of the stream, which in turn helps to maintain the lower water temperatures necessary for maintenance of a trout fishery.
47. Livestock grazing has been included as a use that takes place within a portion of the Redcloud Peak proposed ACEC, Management Unit 5, in the PRMP.
48. Based on documentation by Dr. Peter Brussard, who has studied the subject butterfly, BLM has not deleted the subject phrase from the description of the management unit referenced in the comment. At the present time, BLM has no information that would support the theory that the Uncompahgre fritillary butterfly needs excrement left by livestock to survive. There is a genuine concern and threat to the Uncompahgre butterfly by sheep. Dr. Brussard fears that sheep would be highly detrimental to the continued existence of the butterfly. Dr. Brussard indicates that trampling and grazing by sheep will kill larvae and eggs that are living within the snow willow, and he also indicates that these populations cannot tolerate any additional sources of mortality.

Thank you for your careful review of these comments and be assured that Nicolas Brothers Partnership will continue its active role in the development of a Resource Management Plan for the Gunnison Basin that represents sound applications of multiple-use principles with appropriate regard for the rights of individuals and the needs of the local communities.

Very truly yours,

THE NICOLAS BROTHERS PARTNERSHIP

BY: THE PARTNERS

Paul H. Nicolas
Paul H. Nicolas, Partner

August J. Nicolas
August J. Nicolas, Partner

cc: Gunnison County Commissioners
Ken Hightower Campbell
Bob Moore
Cy Jamelson

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

1353 Raindrop Lane
Golden, CO 80401
June 13, 1991

77

Responses to letter 77

1 through 3. See the responses to comments 3, 1, and 2 of letter 8, respectively.

Mr. Bill Bottomly, RMP Team Leader
Bureau of Land Management
2805 S. Townsend Avenue
Montrose, CO 81401

Re: BLM Gunnison Resource Area

Dear Mr. Bottomly:

The Bureau of Land Management Resource Management Plan and Environmental Impact Statement recently released for the Gunnison Resource Area is, broadly speaking, a good plan representing a lot of thought on the part of the BLM. However, it does not go far enough in protecting outstanding scenic and ecological values in some of the most spectacular and most popular BLM lands in Colorado. We wish to comment specifically about what we regard as serious deficiencies in several attributes of this area.

1 First: Because of past overgrazing and inappropriate grazing much of the range land in the Gunnison Resource Area is in only fair or even poor condition. We strongly feel that the BLM must institute improved grazing management practices which will restore the rangeland to the good condition of which it is capable. It is particularly important to protect and improve riparian habitats.

2 Second: We feel that the Lake Fork of the Gunnison is an unusually good candidate for designation for a wild and scenic river. It was erroneous to exclude that from your recommendations. The headwaters of the Lake Fork downstream from Lake San Cristobal contains some of the most outstanding scenery found in BLM lands nation-wide. In the Alpine Triangle Special Recreation Management Area there are many outstanding visual, spiritual and recreational features that we feel it would be a tragedy not to preserve for future generations to enjoy as we now enjoy. We strongly urge you to recommend wild and scenic river status for all of the Lake Fork from its origin at Sloan Lake in the Handies Peak proposed wilderness to the Blue Mesa Reservoir.

3 Third: The BLM Draft Plan recommends 6 special Areas of Critical Environmental Concern (ACEC's) in the Resource Area which is very positive and excellent planning. However, we believe it has overlooked several other equally important areas that need special management. We urge and ask the BLM to include the following for ACEC designation:

A. The Alpine Triangle. While the BLM has recommended portions of this very scenic area for ACEC designation, we urge that the entire Triangle is so valuable as to deserve the same designation. We cite specific entities that need protection including habitat for the rare Uncompaghre Fritillary Butterfly, three 14,000' peaks - Handies, Sunshine and Redcloud - numerous historical structures and Bighorn Sheep habitat.

B. East Gunnison. This includes BLM lands immediately east of the town of Gunnison which are crucial deer and elk winter range land. ACEC designation is important to protect this significant wildlife habitat.

3 C. Cebolla Creek. This is an important bighorn sheep habitat lying just east of the Powderhorn Primitive Area. ACEC designation would greatly help the herd to achieve a self-sustaining population.

We commend the BLM for proposing ACEC designation for West Antelope Creek, an area immediately north of Blue Mesa Reservoir, which provides crucial elk, deer and bighorn sheep winter range.

Sincerely yours,

Laurence M. Currier, M.D.
Laurence M. Currier, M.D.

Laurence M. Currier
Mrs. L. M. Currier

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 78

Ochs Env.
 Box 1234 78
 Gunnison, CO 81230
 June 15, 1991

Bill Cottamby, RMP Team Leader
 Bureau of Land Management
 2505 South Townsend Avenue
 Montrose, CO 81401

Re: Draft Gunnison Resource Management Plan/
 Environmental Impact Statement (RMP/EIS)

Dear Sir:

After submitting my comments on my letter of May 31, 1991, I am still puzzled and uncertain about apparent inconsistencies in the CDOW Wildlife Herd Goals, Table 2-16 on Page 2-23 and Appendix A - Wildlife Management on Page A-1.

1 It appears that the CDOW elk herd numbers of 1989 post-hunt exceed their long term goal by 1140 elk and their interim goal by 1340 elk. The deer herd numbers are just 90 head less than their long term goal and exceed their interim herd goal by 5,410 head. The 1989 hunt must have fallen far short of expectations.

2 If 1989 post-hunt figures are compared against the long range herd goals on public lands, it appears that the CDOW is planning for 6,290 (or 62.0% of the total) elk to run on private lands and for 8,510 (or 51.5% of the total) deer to run on private lands. This makes no sense and will not happen when such a small percentage of the lands in the resource area are privately owned (for instance, in Gunnison County only about 16% of the land is privately owned.) Private ownership will never consent to running so much of the big game populations on private lands.

3 Wildlife cannot discern public land from private land, so they will go where they want, and the 3,850 elk and 8,000 deer on public lands is artificially low and will be greatly exceeded. Big game use on public lands including riparian areas presently greatly exceeds the interim and long term goals and such intense use must bear substantial responsibility for range and riparian condition. It further points out the problem in the BLM exercising any reasonable influence over big game numbers.

Respectfully submitted,
 Kenneth P. Ochs

1. According to the information provided to us by CDOW, the 1990 hunt was very successful. The CDOW estimates that over 4,800 elk and 2,860 deer were taken, bringing numbers down to about 9,128 elk and about 13,206 deer. Those numbers represent the animals that survived the winter following the 1989 hunt(s). They do not include the new calves that were born in the early spring of 1990, however.

Please refer to the response to comments 12 and 13 of letter 50 for more information regarding Tables 2-16, A-1, A-2, and A-3, in the DRMP.

2. Please see the response to the previous comment, and the response to comments 12 and 13 of letter 50, regarding big game estimates. The BLM recognizes the conflict of big game use occurring on private lands during critical times of the year. We are also aware that CDOW long range herd for GMUs include all lands in the GMUs, not just public, or FS, or state lands. The BLM is confident that, under the correct circumstances, the recently initiated Habitat Partnership Program will lead to resolutions of some of these conflicts in the Planning Area.

3. Please see Appendix A in the PRMP for revised and corrected tables regarding BLM Long Range Herd Goals (and desired carrying capacities in the long term). Please also see the response to comment 12 of letter 50 for more information on the subject.

Please also refer to the last paragraph of the response to comment 41 of letter 38 regarding riparian and range conditions.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 79

1 through 4. See the responses to comments 1, 3, and 2 of letter 8, and 2 of letter 12, respectively.

June 15

Bill Bottomley:

79

- 1 I wish to comment on the RMP/EIS for the Gunnison Resource Area. I do not feel the draft plan does enough to protect the area's high scenic and ecological values.
- 2 The Lake Fork of the Gunnison should be reconsidered as a potential Wild and Scenic river. This river has outstanding visual, geologic, and recreational values that need to be preserved for future generations.
- 3 Please consider the Alpine Triangle, the lands of the East Gunnison, Celvoka Creek, and West Antelope Creek for ACEC designation.

79

- 4 Living adjacent to the Sangre National Forest, it has been my experience that motorcycles, ATV's, and jeeps ^{used to} be strictly restricted to existing roads only. I encounter destruction of flora and erosion problems from the insensitivity of motorized traffic in the forest.

Your position of power and influence concerning the future of our natural resources should be viewed with a spiritual reverence for preservation and conservation.

Sincerely

Dana Ivers

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to letter 80

1 through 5. See the responses to comments 2, 1, and 3 of letter 8, and 2 of letter 12, respectively.

Bill Bottomly, RMP Team Leader
BLM
2805 S. Townsend Ave.
Montrose, CO 81401

80

Michael Cockrell
P.O. Box 1253
Frisco, CO, 80443

June 13, 1991

Mr. Bottomly,

- 1 I write in reference to the draft RMP for the Gunnison Resource Area. First, I commend the BLM for recommending six ACECs, but would request that other areas, including Cebolla Creek, lands east of Gunnison and the area known as the alpine triangle, be added to the list of ACEC recommendations. This designation can serve to protect important habitat and wildlife corridors, scenic, recreational and historical values.
- 2 The Lake Fork of the Gunnison River should be recommended as suitable for Wild and Scenic designation. The corridor is heavily used for recreation and off-road use by the public, such as in geologic and visual values; this river deserves the protections offered by this designation.
- 3 I request that the BLM develop and enact policies that minimize impact on all resources. I insist that the BLM begin to emphasize recreation, ecological health, historical and aesthetic values in land management policies and practices. The preservation of unroaded areas is critical to the long term health of the ecosystem and for quality recreational experiences. I insist that these values be considered over and above those of resource extraction, including grazing management; the condition of rangelands in this resource area are reportedly in fair condition at best. That situation is unacceptable, and I ask that the BLM enact genuine, on-the-ground practices that restore rangelands to good condition, that improve and protect riparian habitat, even if grazing privileges need to be suspended.
- 4 I also insist that motorized vehicles be severely restricted to a few corridors, and highly support the closure of roads, trails and tracks used by vehicle users. I ask this because, as a public lands user, I have simply seen too many ongoing abuses of public land, including habitat fragmentation, erosion and sedimentation of streams and severe scarring of the landscape, all attributable to motorized vehicles; and roads being more roads!! To illustrate the problem, I refer to the Gunnison Basin Area maps distributed by the Forest Service; Excepting the area west of Lake San Cristobal and the Powderhorn Primitive Area, I cannot find a place 5 miles in diameter on BLM lands that is not dissected by a road. I request my comments be accepted as part of the public response to the draft document.

Very Sincerely,

Mike Cockrell

Responses to letter 81

1. Protection of the referenced values within the proposed Dillon Pinnacles ACEC are considered and provided for in the PRMP. Any acquisition of non-federal lands in the unit would be accomplished through fair market compensation.
2. Easements would be acquired following established policies and practices in BLM's 2100 manual series. Just compensation would always be a factor in any easement acquisition action.
3. Please refer to the response to comment 12 of letter 63. Also, the BLM's VRM inventory process is briefly summarized in Appendix C of the PRMP. Table S-1 in the DRMP, page S-16, contains an error under Alternative D regarding Visual Resources. VRM Class II acres total 311,598, not 341,598, as shown. Table 4-1 in the DRMP, page 4-82, also contains an error regarding Visual Resources under Alternative D. The acres following VRM Class III total 93,319, not 93,619, as shown.
4. Timber harvesting would only occur in riparian areas if wildlife and riparian values would be improved. Site conditions would in every case be considered before the decision is made to harvest in these areas. At that time, criteria would be developed as to how to improve these values, if the harvesting would occur.
5. The RMP serves to establish a general management framework for our actions in the Planning Area. Specific details about management, such as how to decide when a permit system would be necessary in the Powderhorn area, would be based on careful observations and monitoring of use, both commercial and private.

Gunnison County, Colorado

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Board of
COUNTY COMMISSIONERS

GUNNISON, COLORADO #1220

June 18, 1991

Mr. Alan L. Kesterke, District Manager
Montrose District
Bureau of Land Management
2505 South Townsend Avenue
Montrose, Co. 81401

Mr. Barry A. Tollefson, Area Manager
Gunnison Basin Resource Area
Bureau of Land Management
216 North Colorado Street
Gunnison, Co. 81230

Mr. Bill Bottomly, RMP Team Leader
Montrose District
Bureau of Land Management
2505 South Townsend Avenue
Montrose, Co. 81401

Gentlemen:

The Gunnison County Board of Commissioners thanks the Bureau of Land Management for the opportunity to participate in the public process of the formulation of planning issues, and to review the resulting Draft Resource Management Plan/ Environmental Impact Statement. The format and clarity of management alternatives presented in this document are credits to its preparers.

Having focused our review primarily on those areas and management activities proposed within Gunnison County boundaries, we offer the following comments, questions and recommendations:

- 1 --The Board supports the designation of the Dillon Pinnacles ACEC. Because reasons for the disparity in acreages between Alternatives D and E are unclear, we support neither alternative over the other, but add that geologic and scenic values should be maximized. Any acquisition of private lands which occurs as part of that designation should be accomplished through fair-market value compensation and/or land exchange.

COURTHOUSE SQUARE 300 EAST VIRGINIA GUNNISON, COLORADO 81230

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--The Board supports acquisition by the BLM of private inholdings within BLM lands, via fair-market value compensation and/or exchange, as well as transfers into private ownership of isolated or non-economic parcels which you have noted for disposal. We discourage significant cumulative loss of private land from the tax rolls, and encourage development of an acquisition/disposal program which results in a balance of public and private acreages exchanged, bought and sold.

--The Board supports acquisition of easements for public access, particularly for those areas cited as desirable for that purpose and which now do not have legal access (page 2-39), again to be accomplished through fair-market compensation and/or exchange.

--The Board supports continued management of the 320 acres in the Wildcat Creek drainage to protect the Town of Crested Butte's water supply.

--The Board supports management of archaeological resources as defined in Alternative "B" (and repeated in the "Preferred Alternative E"), which directs the building of an archeological data base, in addition to complying with existing legislation and policies protecting significant resources. Conflicts between these cultural resource sites and other future site-disturbing uses may be avoided if additional cultural resource data can be collected in field surveys.

--The Board supports the improvement of habitat conditions on those surveyed streams which have been identified as being "below potential" (page 2-27), if such improvement can be accomplished without significant detriment to other established uses. Such improvement of this one element of the ecosystem would ultimately benefit recreational users, as well as those terrestrial and aquatic animals which would be directly affected. We also support requirements within the Preferred Alternative that mitigation of site-specific riparian deterioration will be standard in all surface-disturbing activity plans, and that road construction within identified riparian areas will be kept to "an absolute minimum."

--The Board supports the concept of Alternative D's Visual Resources allocation, in which a majority of acreage falls into Classes II and III which retain or partially retain existing landscape, and in which changes to the basic landscape elements (caused by management activities) would range from "low and not evident" to "moderate and evident." Designation as Class IV should be limited to the site-specific projects whose impacts warrant it; blanket designation of Class IV areas would appear to violate the legal mandate to manage for protection of all resources (including visual resources).

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While the Preferred Alternative lessens the acreage proposed for Class IV from current management levels, it would allow some 39 percent of this planning area to be set aside for "major modifications of the characteristic landscape" from "...activities (which) may dominate the landscape and be the major focus of viewer attention." This conflicts with the Draft's own statement (page 2-35) that, "The demand for undisturbed or minimally disturbed visual resources in the planning area is moderate to high. Most recreationists come to the planning area to experience the natural settings and scenery of the southern Rockies."

Specific landmarks and/or management activities upon which these visual inventories have been made are not clear; we would suggest that further analysis refer to recognized visual qualities within certain management units, particularly evaluating travel routes, public areas, recreational trails and residential, resort or other recreational facilities from which management activities would be visible.

The disparity in total acreages included in the visual classification portion of Table S-1 (615,012 for Alternative D, 585,012 for all other alternatives) leaves some question about actual acreages proposed for individual classifications.

Additionally, we offer the following comments and questions:

--Criteria should be identified for determining how riparian and wildlife values will be improved by logging activities (page 3-103), and so allow commercial timber harvesting in those areas.

--What are threshold points to determine when recreational use levels--both commercial and private/non-commercial--will require permitting and mitigation and/or have caused "adverse environmental impacts" within the Powderhorn Primitive Area SRMA (page 3-113)?

--Further evaluation should occur of "remainders of public lands" which are proposed to be left open for motorized vehicular use; additional analysis should incorporate consideration of seasonal and year-long limitations for certain areas, addressing long-term (beyond the 10-12 year life of this plan) projected traffic volumes and types of vehicle use, existing and projected road locations, conditions and capacities.

The potential destructive impacts of off-road vehicles are well-known. No area should be open to ORV's until studies have been made to insure that the anticipated impacts will not be significant. An assumption of no resource damage in unstudied

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Details on a permit system would be outlined in either a Wilderness Management Plan (if it is designated wilderness) or a Recreation Area Management Plan (if it is not designated wilderness), and would be accompanied by an environmental assessment covering all factors involved in the permitting process.

6. Please refer to the response to comment 23 of letter 35.
 7. Please see the response to comment 2 of letter 35.
 8. The RMP recognizes the need for more management attention in the Hartman Rocks area. The interest shown by the City, County, local homeowners and various interest groups puts an even higher priority on coordinated action. We are going to leave the area in the ERMA in the PRMP, and attempt to secure funding to better manage the AREA, rather than designate the area as a SRMA.
 9. Please see the response to comment 23 of letter 38. The factors mentioned in the comment would be considered during any analysis of proposals to introduce moose on public lands.
 10. Please refer to the response to comment 6 of letter 63. In addition, we would solicit input from Crested Butte and other entities regarding facilities and improvements that would be proposed.
 11. If any part of the subject proposed project, or associated facilities, affects BLM managed lands, this agency would respond according to set policies and procedures, usually upon application to use public lands.
 12. The subject haul route alternatives would be completed during the Environmental Analysis stage after the DOE applies for a right-of-way. The BLMs' sage grouse guidelines would be considered during the analysis.
 13. The objectives of Alternative D warranted the no surface occupancy stipulations for identified lambing areas mentioned in the comment. The objectives of Alternative E, the Preferred Alternative, in the judgement of BLM, do not. If oil and gas activity occurs in an identified lambing area, the oil and gas lease procedures would permit BLM to impose up to a 60-day delay for protection of lambing bighorn sheep.
 14. The BLM estimates of use by activity that you refer to are generally based on our best estimates from observations over time, patrols, or from visitor contact. In the case of mountain bike use, we are certain that some areas currently get more than a low level of use (e.g. Hartman's Rocks) but the general trend on most BLM lands in the ERMA (460,000 acres) is low use by mountain bikers. At the same time we feel that the potential for mountain bike use in the ERMA is moderate to high. There are hundreds of miles of roads, two tracks and trails in the ERMA available to mountain bike users. The BLM is certainly willing to work with the mountain bike community to identify routes they feel would be attractive rides, and promote these routes in informational brochures. Please also see the response to comments 4 and 5 of letter 63.
- Regarding OHV demand and use, there are also some areas that get substantial use, but the ERMA as a whole is not heavily used by OHV recreationists. Vehicles are also used by a wide variety of other recreationists, such as hunters, fishermen, and sightseers. Although BLM considers these as two different categories of recreation users, the road and trail systems on public lands are managed for all the users of public land, the variety of conveyances they use, the recreation opportunities available, and the variety of experiences they seek.
15. Riparian areas that would be intensively managed in one alternative or another are identified on alternative maps. Our mapping scale does not permit the display of all riparian zones in our GIS data base.

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6 areas is irresponsible. Potential damage created by overuse, and/or seasonal misuse because vast areas have not been adequately reviewed for physical limitations benefits no user, including those whose main interests are in off-road vehicles.

7 --Table 2-1 should be updated to reflect 1990 Bureau of Census figures which may skew other statistical assumptions within this Draft. Attached to these comments is information extrapolated from current Bureau data, which may be helpful to you in making these corrections.

8 --The Hartman Rocks area has received much attention by the City of Gunnison and Gunnison County and nearby residents particularly within the past few months; this is an area which clearly qualifies for designation as a Special Recreation Management Area. The area is heavily used by users who are often in conflict with each other; because of the volume of use, and the different types of uses, safety is an issue, and adverse impact to area resources has been significant.

In addition to meeting these criteria, management of the area as an SRMA in concert with local government and private efforts would set a desirable and practical precedent for interjurisdictional land use administration and development.

9 --On what bases will the introduction of moose be considered in the Powderhorn Primitive Area SRMA? On what basis has this issue been included in the Draft? Analysis, if authorized, should obviously include assessment of this new population on private-land ranching activities and on other existing wildlife populations.

10 --Inclusion of a developed campground in the Slate River area would undoubtedly be welcomed by users and non-users alike. We would recommend that the BLM meet with Town of Crested Butte officials to determine how facilities might best be designed to meet area demands.

11 --Potential development of the Rocky Point pumped back storage project should be referenced in this document, particularly in light of transmission line corridor impacts on private and public lands.

12 --Have the U.S. Department of Energy's haul route alternatives for the Uranium Mill Tailings Remedial Action Program been considerations in the evaluation of sagegrouse habitat and population expansion in the management units south of the City of Gunnison?

13 --The No Surface Occupancy Stipulation protecting lambing areas for bighorn sheep in areas open to future oil and gas leasing should be included in the Preferred Alternative. This

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13 additional stipulation appears to complement a separate stipulation protecting bighorn sheep and their habitat (which is included in the Preferred Alternative).

14 --Table 2-27 lists mountain biking demands in the Gunnison ERMA as "low." Consistently over the past couple of years, mountain bikers have told us that use in the area, particularly in the Hartman Rocks area is substantial, and would increase if more terrain were accessible. Nearly twelve years ago, a recreational study conducted by Harvard University identified the potential for this kind of use in this area.

OHV demand is also listed as "low to moderate," when use appears to be greater than this indicates. User numbers may have increased since uses were surveyed.

15 --Identified riparian areas should be included on maps.

16 --A question was raised by the County Planning Commission concerning reclamation of the "community gravel pit" west of the City of Gunnison. Is reclamation planned? Required? Consideration might also be given to allowing gravel removal from areas where it has been deposited by erosion.

17 --Identification of hazard areas--specifically of abandoned mine shafts--and including them on maps, would be in the interest of public safety, particularly in light of projected increases in recreational use of this relatively unmonitored land.

18 --The rate at which Allotment Management Plans have been completed (28 of 146 in the basin) raises questions of whether or not there is adequate funding to provide staff hours to devise plans and monitor results. Lack of completion of these AMP jeopardizes both the individual rancher and the basin's ranching industry, which is a major economic player in this community. Has a realistic timetable for changes, revisions and implementation been devised so that these can be completed? Given the reality of variable funding for the agency, is this a realistic program?

19 --Grazing figures should be updated to 1990 levels.

20 --How was a fifteen percent increase across-the-board for implementation of any alternative determined? This seems to be in some conflict with an earlier statement (page 3-3) noting that Maximum Resource Enhancement and Maximum Production Enhancement Alternatives were not analyzed because, "...it is not practical to develop land use decisions and allocations based on what funds might or might not be available."

While this ideally is true, alternative cost allocation for capital improvements, maintenance, evaluation of new programs and monitoring of existing ones must be part of the determination of

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16. BLM assesses a 5¢/cubic yard reclamation fee on each cubic yard of gravel sold from the community pit; this fee goes into an account to be used by BLM to reclaim the pit area when the reserves of gravel are depleted.

The disposal of mineral materials (sand and gravel) is a discretionary action and would be permitted on a case-by-case basis on 666,530 acres of public lands Resource Area (92% of the Federal mineral estate in the planning area); any approval granted for the removal of mineral materials would be subject to protective stipulations identified in a site-specific environmental analysis.

17. Please see the response to comment 15 of letter 35.

18. Please see the responses to comment 33 of letter 38, and 2, 3, and 4, of letter 50.

19. Please see the response to comment 3 of letter 35.

20. The 15% increase estimate over current funding to implement any of the alternatives is an assumption arrived at by the planning team, and the economist on the team. Please also see the response to comment 9 of letter 35.

21. Coordination with Gunnison County, and applicable municipal governments, would occur in regard to the request in the comment.

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20 monitoring of existing ones must be part of the determination of which alternative is preferred. It would seem in the best interests of both the public and BLM administrators to have variable implementation plans within the selected management plan to accommodate what is acknowledged to be unpredictable future funding levels.

21 --We would request that the BLM regularly provide the County with maps of land disposals and acquisitions, which transactions may impact, or be impacted by, other development on private land.

The Board also refers to the Gunnison County Stockgrowers Association letter of May 20, and to the High Country Citizens' Alliance letter of June 12, which raise questions and comments on vital issues of importance to citizens of this County. We urge your careful review and consideration of the concerns and recommendations submitted by both these groups.

Again, we thank you for the opportunity to review and comment on this Draft, and look forward to working with you as you continue the process of revision and implementation.

Most sincerely,

Gunnison County Board of Commissioners

Fred Field
Fred Field, Chairman

Mario V. Petri
Mario Petri, Vice Chairman

R.A. Santarelli
R.A. Santarelli, Commissioner

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Responses to letter 82

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OF COUNSEL
JOHN S. HARTERS

June 20, 1991

VIA FEDERAL EXPRESS

Mr. Bill Bottomly
RMP Team Leader
Bureau of Land Management
2505 South Townsend Avenue
Montrose, CO 81401

Re: COMMENTS to Draft Gunnison Resource Management Plan/Environmental Impact Statement on behalf of Mr. Lamar Norsworthy and Mr. Stan Whinnery

Dear Mr. Bottomly:

On behalf of Mr. Lamar Norsworthy of the Trout Creek Ranch and Mr. Stan Whinnery of Whinnery Ranches (permittees), this letter offers comments to the Draft Gunnison Resource Management Plan/Environmental Impact Statement (DRMP/EIS). Although the comment period on the DRMP/EIS ended June 17, 1991, you stated in a telephone conversation with me on June 17, 1991, that you would accept my comments to the DRMP/EIS if received no later than June 21, 1991. On behalf of the above named permittees, thank you for your verbal extension of time and for the opportunity to comment on the Gunnison Draft Resource Management Plan and Environmental Impact Statement.

Mr. Lamar Norsworthy and Mr. Stan Whinnery are livestock operators with grazing permits and leases in the Gunnison Resource Area. Mr. Norsworthy owns or leases grazing rights in Bureau of Land Management (BLM) allotments 6105, 6107 and 6103. Mr. Norsworthy uses these leases and permits in his cattle operation. Mr. Whinnery owns or leases grazing rights in BLM allotments 6011, 6120, 6130, 6131, 6132, 6502, 6033, and 6034. Mr. Whinnery is dependent upon the use of his allotments for both his cattle and sheep operations. Without the full and unencumbered use of these allotments, neither permittee would own a viable ranch operation.

1. Please see the comments and responses to letter 76. As a result of public input and internal review, prescriptions for units 1, 2, 5, and 16 in Chapter Four of the PRMP contain additional language addressing livestock grazing management. Although one or several uses or resources would be specifically managed for in some units, the resources would not be managed to the exclusion of all other uses, and use of lands for a single purpose, unless specifically allocated, is neither implied nor intended in any of the prescriptions.
2. Please refer to the Wildlife Habitat Management and Livestock Grazing Management sections in Standard Management for the PRMP, Chapter Four, for clarification regarding allocation of new available forage.
3. Please refer to the response to comments 11, 15, 16, and 20 of letter 38, regarding carrying capacities and the relationship between CDOW and BLM regarding requests for reductions in population numbers. Also, please refer to the response to comment 13 of letter 50 for information regarding the manner in which elk population estimates are calculated during the year. Since 1983 the CDOW has been trying to hold elk numbers down to their long range herd goal of 9,000.

Recommendations were made in the DRMP to hold game populations within habitat carrying capacity on public lands (please see Table A-3, page A-1, in the DRMP). As a result of our monitoring studies, our primary concerns are with the long range herd goals for deer. In Table A-3, page A-1, in the DRMP, the BLM recommends lower interim herd goals for deer until shrub production and vigor increases. Please also see Appendix A in the PRMP.

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The Draft Gunnison RMP/EIS will dramatically affect the livestock operations of these permittees. In general, the DRMP/EIS (1) includes severe grazing restrictions on the use of the permittees' grazing allotments; (2) places permittees grazing allotments in the "I" category without first obtaining the scientific or monitoring data necessary to support the classifications; (3) proposes illogical riparian mitigation techniques that focus on eliminating livestock use rather than repairing deteriorated areas; (4) defines certain streams as embodying potential riparian areas even though those streams may fall outside of the definition of a riparian area promulgated by the Director, BLM; (5) restricts and reduces domestic sheep grazing numbers based on an unsupported theory that domestic sheep can cause disease in Big Horn sheep; (6) claims that the prairie dog is an "uncommon" species even though the Gunnison Area boasts historic black footed-ferret habitat including the main ferret food source, the prairie dog; (7) severely restrict mineral development; (8) supports an increase in wildlife populations even though wildlife habitat in the Gunnison Resource Area is in poor condition, often due to over sue by wildlife; and (9) proposed to acquire additional access into certain areas to the detriment of the permittees' property interest in those areas. The implementation of these restrictions will have a devastating affect on the ability of area permittees and lessees, including Mr. Norsworthy and Mr. Whinnery, to utilize their grazing allotments and to quietly enjoy their private property, rights and livestock operations. It is with this concern that Mr. Norsworthy and Mr. Whinnery offer the following comments:

I. Management for Recreation and Wildlife Values Cannot Dominate Livestock Grazing and Other Multiple Use Values

Although the BLM professes to follow the principal of multiple use in writing its DRMP/EIS, there are numerous portions of the document that do not reflect that commitment. The Gunnison DRMP/EIS defines "multiple use" as:

Management of the various surface and subsurface resources so that they are jointly utilized in the manner that will best meet the present and future needs of the public, without

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permanent impairment of the productivity of the land or the quality of the environment.

RMP/EIS at Glossary - 6.

Although multiple use does not mean that every use must be present on every acre, it does mean that each acre should be evaluated to determine its highest and best use so that that use will be made on that acre. With the multiple use definition in mind, the BLM should reconsider its DRMP/EIS decisions with regard to the following:

1. The BLM DRMP/EIS divides the Gunnison Resource Area into management units. Each management unit has a specific use or purpose which will dominate all other multiple uses. In each management unit, should a legitimate multiple use conflict with the dominant use of the area, that legitimate use would be modified or possibly restricted. DRMP/EIS at 3-2.

The restriction of legitimate multiple uses greatly concerns Mr. Norsworthy and Mr. Whinnery. For example, both permittees have livestock grazing allotments in management unit marked "E-1." Mr. Whinnery has grazing allotments located in management units E-5 and E-16 and Mr. Norsworthy has grazing allotments located adjacent into management unit E-2. When originally established as for livestock grazing the BLM determined that those locations are suitable for livestock grazing. However, the Gunnison DRMP/EIS statement of dominant uses in management units E-1, E-2, E-5, and E-16 do not include livestock grazing. Therefore, under the Gunnison DRMP, should livestock grazing in the BLM allotments located in those units conflict with the dominant use of wildlife or recreation, livestock grazing would suffer. Again, for grazing allotments to be established in these locations, the BLM had to make the determination that these lands were suitable for such grazing. The Gunnison DRMP now plans to restrict that grazing use. The permittees request that the dominate use of management areas E-1, E-2, E-5 and E-16 be altered to include livestock grazing.

2. Wildlife use also dominates over livestock grazing during the allocation of new forage. BLM policy and regulations have long mandated that those entities or groups who expend the energy and

4 and 5. Several studies document the problems that occur to bighorn sheep when domestic sheep are grazed in the same area. In addition to the studies referenced in the response to comment 38 of letter 50, we also have several additional studies conducted from 1982 to 1991 that were published in The Journal of American Veterinary Medical Association, Journal of Wildlife Diseases, that show the problem when domestic livestock are intermingled with bighorn sheep. Beside disease related problems, other areas of concern when managing for bighorn and domestic livestock occur in the utilization of forage, wild sheep and habitat displacement, and interbreeding.

Also, the recommendations in the DRMP and PRMP to eliminate domestic sheep grazing were made after a thorough consideration of all values involved.

Rather than attempting to create a 40% increase in recreation use in the Planning Area over the life of the plan in the Preferred Alternative, BLM, through the RMP, is responding to the increases in expected recreation use as a result of improvements and increases in nearby facilities, regional and local marketing, and natural population growths.

6. Allotment categorization is based on application of established criteria for conditions existing at the time of application. Please see the Livestock Grazing Management section of STANDARD MANAGEMENT in Chapter Four, in the PRMP, for information regarding evaluation of categorization. Please also note that application of some portions of the STANDARD MANAGEMENT section for grazing would not apply to M or C Allotments.
7. Please see the revised Livestock Grazing Management section of STANDARD MANAGEMENT for flexibility in the implementation of grazing recommendations in I Allotments.
8. Please see the response to comments 2, 3, and 4 of letter 50, and 6 of letter 69.
9. Minimum stubble heights and ranges for percent of forage utilization in riparian areas are recommended to help improve resource conditions, including for forage, in these areas. Please refer to in the Livestock Grazing Management section of STANDARD MANAGEMENT in Chapter Four of the PRMP for information regarding implementation of minimum stubble heights and percent of utilization, and flexibility in this implementation. Please also see the revised subsection titled "Monitoring and Range Readiness" in the section referenced above in this comment for recommendations regarding trend studies and the application of these and other data to livestock grazing management.
10. Please see the response immediately above.
11. Adjustments, such as reducing AUMs in an Allotment, would be made only if other solutions would not be successful in achieving the objectives in a particular management unit or area.
12. As a result of this and similar comments, and internal review, the Wildlife Habitat Management section of STANDARD MANAGEMENT has been revised in the PRMP to address habitat conditions and proper use levels by wildlife. Please see the response to comment 9 of this letter regarding implementing grazing recommendations..
13. The definition of riparian areas in the DRMP was stated as such to explain and define the areas that are considered riparian areas. The definition of riparian areas is from the Bureau Manual 1737 - Riparian and Wetland Area Management.

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effort to create additional forage on the federal lands will be allowed to utilize that additional forage. For example, if a rancher completes a seeding or brush treatment project or builds additional water ponds or tanks on his allotment, the current BLM policy and regulations would allow the rancher to utilize the additional forage created by his actions for livestock grazing.

2 However, the DRMP changes this long standing policy by directing that additional forage shall first go to satisfy watershed objectives then shall be divided between wildlife and livestock use. RMP/EIS at 3-105. The BLM DRMP/EIS takes all incentive away from ranchers, wildlife support groups, recreation groups or others to expend time, funding and effort to create additional forage on the federal lands. Once it is learned that benefactors no longer have the assurance that the forage increased by their efforts will be used in a manner consistent with their objectives, there will be no reason for individuals or groups to invest in the federal lands. The permittees request that the BLM follow their long standing policy of giving additional forage to those who develop that forage.

3. The DRMP/EIS contains conflicting goals and statements regarding wildlife population goals and the condition of wildlife habitat. The BLM DRMP/EIS admits that wildlife habitat many parts of the Gunnison area is in fair to poor condition. DRMP/EIS at 2-24, 2-26. In describing the condition of this habitat, the Gunnison DRMP/EIS states that the condition of winter browse is decreasing, riparian areas are overused, sagebrush in some areas is decreasing from overgrazing, and much of the forage is suffering from low plant vigor. DRMP/EIS at 2-24.

3 However, instead of requesting that the Colorado Division of Wildlife (CDOW) permanently decrease wildlife numbers to protect the remaining wildlife habitat, the BLM DRMP/EIS blindly adopts the CDOW goals for wildlife population numbers. DRMP/EIS at 2-24, 2-26. At best the BLM will only request temporary reductions in wildlife populations to revive the habitat. DRMP/EIS at 3-104. The BLM states that it will support wildlife populations increases to current resource damaging levels.

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3 Because of the condition of the resource and the increasing wildlife population numbers, in reality the BLM will be forced to (1) allow the habitat to continue to deteriorate or (2) remove livestock to allow room for increasing wildlife. The first option of allowing continued habitat deterioration directly conflicts with the BLM's mandate to care for the range resource. In the alternative, the second option, decreasing livestock use of the resource to allow for expanding wildlife populations, will not to produce the desired results of increased habitat for wildlife, especially deer and antelope either. According to most experts, deer and antelope do not compete for the same forage as livestock except for a few weeks in the spring. Deer and antelope eat forbs while livestock eat grasses. Therefore, removing all livestock grazing from the area will not result in increased wildlife habitat for these species. (It should also be noted that if livestock grazing allotments were in the poor condition of the wildlife habitat described above, livestock grazing would be eliminated or severely restricted from those allotments. If the BLM were interested in true multiple use, the BLM would require these same restrictions on the CDOW.)

4. As described above, livestock grazing has received less than equal treatment in the BLM DRMP/EIS. However, even worse treatment is given to owners of domestic sheep operations. For example, the DRMP/EIS cites numerous areas where domestic sheep grazing will be restricted or eliminated in favor of Big Horn sheep grazing. This is true even in areas where domestic sheep have traditionally grazed and the BLM wants to introduce or augment Big Horn sheep populations. DRMP/EIS 2-25. The BLM claims that the removal of domestic sheep is necessary to protect Big Horn sheep from disease. However, the BLM does not offer any evidence that domestic sheep cause disease in Big Horn sheep. Without offering such scientific proof of the assumed disease transfer, the BLM should not plan to reduce domestic sheep grazing.

5 Second, the BLM reduction of domestic sheep in favor of Big Horn sheep violates all multiple use mandates described above. Domestic sheep grazing is an important use in the Gunnison area and should be on equal footing with Big Horn sheep use.

14. The language on page 3-103 in the Riparian Zones section of Standard Management for the Preferred Alternative regarding water source developments means that, in riparian areas, modifications or relocations would be required, if the usage of these developments results in riparian hydrologic conditions being negatively impacted. Actual fencing of livestock water developments, such that livestock are not permitted access to these developments, is not a mitigation measure contained or implied in the Riparian Zones section, page 3-103. Please refer to the response to comments 4 and 7 of letter 38 for more information on impacts in riparian areas. In keeping with the intent of the introductory sentence in the Riparian Zones section, page 3-103, recreation use, wildlife use, road construction and maintenance, timber harvesting, and any other activity occurring in these important areas would be controlled if damage results to riparian values, including vegetation, soils, or water.

15. The BLM would follow all applicable laws, policies, and regulations when acquiring any access or easement.

16. The purpose of the sensitive species program on BLM managed lands in Colorado is to ensure that authorized actions on public lands do not contribute to the need to list an animal or plant species as threatened or endangered. The butterfly species named in the comment was listed as endangered by the USF&WS on June 24, 1991. Please see the response to comment 7 of letter 9 for more information. The BLM is obligated to manage all uses on public lands in order to comply with all applicable laws and policies regarding these special status species, regardless of the program or use that could potentially impact these species.

17. All of the comments we received on the DRMP were considered in the development of the PRMP. The DRMP or the PRMP are not decision documents that can be appealed. The recommended decisions or actions in the PRMP can be protested during a 30-day period following publication, however. Protest procedures are located at the front of the PRMP. Any subsequent decisions that are made to implement ROD/RMP recommendations or decisions can be appealed also, for example, proposed rights-of-way grants or long-term lease applications, adjustments in AUMs, or timber sales.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Mr. Dan Bostandy
June 20, 1991
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5

5. Planning a 40 percent increase in recreation use while enforcing a decrease in mineral development and merely keeping the status quo for livestock grazing is not an example of equal multiple use. DRMP/EIS at 3-106.

II. The Decisions Reducing Livestock in the Gunnison Area Use Lack a Legal, Regulatory or Technical Basis

Pursuant to the Federal Land Policy and Management Act (FLPMA) and the Taylor Grazing Act, livestock grazing is a viable and legitimate use of the federal lands. Upon enactment in 1936, the Taylor Grazing Act directed the BLM to consider which of its land was valuable for livestock grazing purposes, establish grazing districts offer grazing permit and administer those lands for the purposes of livestock grazing. 43 U.S.C. §315. The adoption of FLPMA in 1976 did not change that mandate. 43 U.S.C. §1701 (b).

In carrying out its statutory authority, the BLM has adopted numerous regulations and policies governing livestock grazing. Those regulations and policies include a requirement that the agency must complete three to five years of range or resource monitoring studies before the agency can remove or reduce livestock grazing on an allotment and that the agency must have accurate scientific or technical data on which to base its decisions.

However, the BLM DRMP/EIS does not contain the scientific, technical or regulatory basis for many of the decisions affecting livestock grazing. For example, Mr. Norsworthy has grazing permits and leases for allotments numbered 6103, 6105, and 6107. The BLM claims that each of these allotments is in an "Intensive" management "I" category.

6

There are several reasons that the "I" category is of concern to Mr. Norsworthy. First, the BLM has placed his allotments in the "I" category without proper scientific documentation. For example, allotment 6105 contains a total of 5701 acres. Of the acres receiving BLM monitoring, 3287 are classified as in "good" range condition. The remaining 7501 acres have not been classified. The allotment contains 0 acres with a range condition rating of fair or poor, yet the allotment remains in the "I" classification category. DRMP/EIS at B-7. Certainly the range condition of those acres that have been studied do not justify an "I" category.

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Additionally the BLM has not classified the remaining acres, therefore does not know the range condition of those acres. Again, the BLM does not have the technical basis to justify an "I" classification for allotment 6105.

The same problems of a lack of technical knowledge exist on Mr. Norsworthy's other two allotments. Allotment 6103 contains 18,009 acres. Only 2,933 of these acres have received technical range monitoring and of those 2,933 acres, 2,295 boast a good or fair range condition. The remaining acres in the allotment have not been classified. DRMP/EIS at B-7. Allotment 6107 contains 109,851 acres. Of those acres, one-half or 59,917 acres have been studied, and 40,546 acres boast good or fair condition ratings. Again the remaining acres have not been studied. DRMP/EIS at B-7. Again, the BLM does not have the scientific data required to place these allotments into an "I" category for management purposes.

6

Mr. Whinnery's allotments suffer from the same lack of scientific data as do Mr. Norsworthy's allotments. Mr. Whinnery owns allotments numbered 6011, 6033, 6034, 6120, 6130, 6131, 6132 and 6502. Of these eight allotments, five are in an "I" category and three are in a custodial or "C" category. Again, since the majority of the acreage in these allotments is unclassified and more acreage in each allotment falls into the "good" or "fair" range condition category, the BLM does not have the technical or monitoring data to support placing these allotments into these categorizations.

The permittees are concerned with the incorrect adoption of the "I" and "C" allotment categories for several reasons. First, these categorizations are simply incorrect. The BLM does not have the monitoring or technical data to support these categories, therefore it should not claim to have that data by assigning an arbitrary category to each allotment.

Second, allotments in the "I" and "C" categories are view by numerous environmental groups and others to be unfit for livestock grazing. Therefore, the BLM will receive pressure from these groups to remove or severely restrict livestock grazing from these allotments, regardless of the true condition of the allotment. The "I" categorization can also be used as an excuse to restrict livestock grazing, when such restrictions are merely meant to harass the operator rather than to protect the allotment. Although Mr. Norsworthy and Mr. Whinnery are not alleging that they are

7

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7 receiving this type of treatment, they are concerned that the inaccurate use of the "I" category will restrict the use of their allotments because of the categorization, not because the resource is in unsatisfactory condition.

8 An additional problem with the BLM management of livestock grazing is its attempt to "encourage" permittees to sign allotment management plans (AMPs). The DRMP/EIS states that one to two AMPs will be completed each year and that early turnout of livestock will be prohibited unless the allotment is managed by an AMP. Because the BLM regulations do NOT require that an AMP be signed by the permittee, the BLM should not try to "coerce" permittees to enter into an AMP by easing the grazing requirements for AMP holders. Even if each permittee honestly wanted an AMP, the BLM plan of writing one to two AMPs per year will assure a long wait for plan completion given the number of AMP's to be completed by the agency. DRMP/EIS at 3-105.

III. The Utilization Standards in the Gunnison DRMP/EIS should be Revised to Reflect the Current State of Scientific Knowledge regarding Plant Use and Growth and should Eliminate the Penalty to Livestock for Wildlife Use

9 Although the BLM DRMP/EIS does not plan a stated decrease in livestock grazing, the plan admits that adjustments (decreases) in livestock numbers will be required to satisfy the imposition of allotment utilization standards. DRMP/EIS at 3-105. Utilization standards are a monitoring tool designed to measure the percent of forage that has been consumed by livestock or wildlife during a specific period in relation to the total growth of a plant.

9 The BLM DRMP/EIS states that general utilization standards of "key species" shall be 40 percent to 60 percent by weight throughout the growing season. In riparian moist areas, utilization shall be held to 40 percent to 60 percent of the current year's growth, with a two and one-half inch minimum stubble height maintained throughout the growing season. DRMP/EIS at 3-105. In those riparian areas located in management units 14 and 15, the utilization standards shall be 40 percent to 60 percent of the current year's growth, with a minimum stubble height of 4 inches. DRMP/EIS at 3-128.

There are numerous legal and scientific reasons that the utilization standards proposed by the BLM are completely unreasonable and will act

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9 only as a tool to unnecessarily limit livestock grazing. First, it appears as if the BLM has implemented these utilization standards to describe the health of the allotment and to ascertain when livestock should be removed from the allotment. However, without trend studies, the use of any utilization standards in ascertaining the health of the allotment is meaningless. Utilization studies only show the amount of the forage taken at one point in time. Without additional trend data, there can be no measure of the condition of the allotment over time. Again, allotment health or "resource damage" must be measured over time with trend studies and cannot be ascertained with utilization studies alone.

10 The second problem with the imposition of these utilization standards is that they are unrealistic and will be used merely as a tool to remove livestock from an allotment before the end of the grazing period. The BLM states that utilization standards will be between 40 percent and 60 percent by weight. Therefore, the bulk of the scientific knowledge recognizes once a grass has attained seed ripe, it can sustain between 50 percent and 70 percent utilization without harm to its health. The utilization standards suggested by the Gunnison DRMP/EIS should consider the differences in forage strength during certain growth phases and revise the utilization standards accordingly; i.e., heavy utilization of the forage after seed ripe should be acceptable.

11 Third, the BLM DRMP/EIS suggests that reductions in livestock grazing will occur in order to reach the BLM's utilization goals. However, as stated above forage can sustain heavy utilization at certain times of the year without damage to plant health. Therefore, if the BLM was concerned about the health of the allotment only, the BLM could alter grazing livestock strategies, by implementing rest and rotation systems or altering on and off dates, in order to protect allotment health without reducing livestock numbers. The BLM DRMP/EIS should recognize that altering grazing strategies can substitute for livestock reductions in protecting allotment and plant health.

12 The fourth problem with the utilization standards in the DRMP/EIS is that they are cumulative. Cumulative forage utilization standards establish the amount of use that both livestock and wildlife can make of a single plant during the grazing season. For the livestock industry, this means that should the utilization standards for a key species in an allotment be reached because of a consumption of forage by wildlife before livestock

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are allowed to enter an allotment, the livestock will be removed or denied entrance into that allotment. In other words, under these utilization standards, once the maximum utilization level is reached, livestock grazing will no longer be allowed, regardless of the length of time that livestock have used the allotment or the overall health of the allotment.

12 Even though the DRMP/EIS claims that livestock numbers will not be reduced, the imposition of cumulative utilization standards will severely diminish or eliminate livestock grazing in allotments heavily used by wildlife. The permittees request that should the BLM determine that the imposition of utilization standards is necessary to protect the health of grazing plants, those standards should be applied only to livestock use. Livestock grazing should not suffer because of wildlife overuse on an allotment.

IV. Riparian Areas should be Defined and Managed Pursuant to the Bureau of Land Management Riparian Area Management Policy Issued January 22, 1987 by the Director, Bureau of Land Management

The Gunnison DRMP/EIS defines riparian areas as:

13 Those areas that are adjacent to intermittent and perennial streams, rivers, springs, bogs, ponds, lakes, reservoirs, and other bodies of water. These areas have visible vegetation or physical characteristics reflective of permanent ground or surface water influence. The soil moisture regime typical of riparian areas is responsible for the much higher plant production compared to surrounding sites.

DRMP/EIS at 2-16. Emphasis added.

This definition does not comply with the National BLM riparian area management policy issued January 22, 1987 by then-Director Robert Burford. This policy, which has not been repealed or amended, sets forth riparian a definition of riparian areas which excludes ephemeral or intermittent streams. The National riparian area definition states:

Riparian Area - an area of land directly influenced by permanent water. It has visible vegetation or physical characteristics reflective of permanent water influence. Lake

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shores and stream banks are typical riparian areas. Excluded are such sites as ephemeral streams or washes that do not exhibit the presence of vegetation dependent upon free water in the soil.

13 Bureau of Land Management Riparian Area Management Policy, from Robert Burford, Director, Bureau of Land Management, January 22, 1987. Emphasis added.

Again, this Bureau wide riparian definition has not been altered or withdrawn. The Gunnison Resource Area should not be allowed to ignore this direction from its Washington office and incorporate its own definition of a riparian area in the DRMP/EIS.

14 The permittees concern over the definition of a riparian area stems from the threat to livestock grazing once a riparian area is named. Although the BLM starts to outline a reasonable plan for riparian repair based on an inventory of each area and a determination regarding the cause of the riparian deterioration, once that cause is ascertained, the agency reverts to mitigation measures designed to reduce livestock grazing rather than tailor the repair to the cause. DRMP/EIS at 3-103. For example, suggested mitigation measures include fencing of livestock away from their water source, restriction of forage utilization levels applied only to livestock, closure and rehabilitation of roads and reclamation of disturbed areas. DRMP/EIS at G-1. Notably absent from these mitigation measures is an attempt to control wildlife use if they are causing riparian damage or a relocation of campgrounds or other recreation facilities if the location of those facilities causes undue pressure on the riparian area. The permittees request that riparian mitigation measures be altered to reflect riparian protection from all potential sources of riparian damage, including recreation and wildlife use and not merely select those mitigation measures detrimentally effecting the livestock grazing.

V. Without the Proper Controls and Protection for Wildlife and Livestock, the BLM Should Limit its Program to Create or Acquire Additional Access

The DRMP/EIS plans several additions to its access and transportation system. The DRMP/EIS states:

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Public access would be acquired into the Devil's Creek⁸² area for recreation management and administrative access would be acquired into the east-central part of the unit that includes Yeager Gulch and Skunk and Trout Creeks for commercial forest management. Public hiking access would be acquired into the Alpine Gulch drainage. Public access would be acquired between Lake City and Trout Creek and east of Colorado Highway 149, for recreation access to public lands within and adjacent to Management Unit E-2. Public access would continue to be acquired, as opportunities arise, to BLM and USFS management lands between Lake City and Red Bridge campground.

DRMP/EIS at 3-112.

15 Mr. Norsworthy and Mr. Whinnery are very concerned with this proposed access proposal. These permittees have grazing permits and leases in most of these areas so will suffer the brunt of livestock harassment, resource deterioration from increased recreation, and trespass. Additionally wildlife will suffer from increased recreation pressure. The BLM does not have the money nor the personnel to patrol these areas to ensure that private property such as livestock, remain safe. Before the agency pursues the acquisition of access into these areas, the BLM should complete a takings implication assessment pursuant to Executive Order 12630 to ensure that private property and private property rights will not be affected.

VI. The BLM Sensitive Species Program Should Not Act as a "Defacto" Recovery Program under the Endangered Species Act

16 The DRMP/EIS states that three listed endangered species reside within the Gunnison area. These three species have been duly listed as threatened or endangered species pursuant to the Endangered Species Act (ESA), 166 U.S.C. §1500. Because of the harsh controls placed on federal and private lands from the protection of a legally listed threatened or endangered species, the ESA mandates a careful and lengthy listing process to ensure that only those species that are truly threatened or endangered by man's activities are listed.

The BLM Sensitive Species Program acts must like the ESA program, but without the procedural safeguards to private property and federal land

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16 use. For example, even though the Uncompahgre fritillary butterfly is not a legally listed threatened or endangered species, livestock (sheep) grazing may be restricted because of habitat disturbance and trampling. DRMP/EIS at 3-116. In other words, livestock use of this area will be severely impacted, without offering to that permittee the opportunity for protection of the ESA process.

Additionally, the DRMP/EIS states that the butterfly's habitat is within a heavily used recreation area. However, recreation use is not restricted or managed to protect this same butterfly habitat. Certainly if the BLM were truly interested in protecting this sensitive species habitat, all harmful use of the habitat, including recreation, would be managed.

VII. Conclusion

17 In conclusion, the permittees request that the Gunnison RMP be rewritten pursuant to the legal and technical standards described above. This second draft should be resubmitted to the public for additional comment before it becomes a final, appealable document.

Thank you for consideration of these comments to the Draft Gunnison RMP/EIS and for granting to me an extension of time to file these comments. Although these comments include all issues of concern to the permittees, they reserve the opportunity to amend these comments as additional information becomes available. Should you have any questions, please don't hesitate to contact me.

Sincerely,

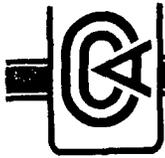
DRAY, MADISON & THOMSON, P.C.


Karen J. Budd

KJB/sr

cc: Mr. Stan Whinnery
Mr. Lamar Norsworthy
Chris Chella, Esq.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES



COLORADO CATTLEMEN'S ASSOCIATION

SUITE 220, WESTOCK EXCHANGE BUILDING DENVER, COLORADO 80202 TELEPHONE 333-1112

Response to letter 83

Thank you for your letter.

June 12, 1991

Mr. Barry Tollefson, Area Manager
Gunnison Basin Resource Area
Bureau of Land Management
216 North Colorado Street
Gunnison, CO 81238

83

Dear Mr. Tollefson:

The Colorado Cattlemen's Association would like to voice our support for and full endorsement of the comments submitted to you by the Gunnison County Stockgrowers Association (GCSA) regarding the BLM's draft RMP/EIS for the Gunnison Basin. The GCSA spent a considerable amount of time thoroughly reviewing this document and assessing the potential impact which it could have on local livestock producers.

~~We have enclosed a copy of the GCSA's comments for your information.~~
Thank you again for the opportunity to participate in this review process. Please don't hesitate to contact our office if you should have any questions about CLA's position in regards to this document.

Sincerely,

Terry Carlstrom
President

Dray, Madison & Thomson 84

W. PERRY DRAY
DOUGLAS R. MADISON
WILLIAM J. THOMPSON
RICHARD C. DYKMAN
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OF COUNSEL
JOHN E. MARTIN

June 28, 1991

Mr. Bill Bottomly
RMP Team Leader
Bureau of Land Management
2505 South Townsend Avenue
Montrose, CO 81401

RE: Amended Comments to Draft Gunnison Resource Management
Plan/Environmental Impact Statement on Behalf of Mr. Lamar
Norsworthy and Mr. Stan Whinnery

Dear Mr. Bottomly:

On June 20, 1991, the Bureau of Land Management (BLM or Bureau) received comments to the Draft Gunnison Resource Management Plan/Environmental Impact Statement on behalf of Mr. Lamar Norsworthy and Mr. Stan Whinnery. The purpose of this letter is to make three technical corrections to those comments.

1. The June 20, 1991 comments incorrectly state that Mr. Whinnery owns livestock grazing allotments located in management unit E-16. Those statements should be corrected to say that Mr. Whinnery owns livestock grazing allotments located in management unit E-15. Again, each place designated as management unit E-16 should be changed to reflect management unit E-15.
2. Mr. Whinnery also owns livestock grazing allotments located in management unit E-13. According to the BLM, Draft Gunnison Resource Management Plan, management unit E-13 generally contains livestock grazing allotments in the "I" category. As stated in Part II of the June 20, 1991 comments to the Draft Gunnison RMP, Mr. Whinnery and Mr. Norsworthy are concerned that the Bureau does not have the technical or scientific monitoring data to support a

Responses to letter 84

1. The comment is noted.
2. See the response to comment 6 of letter 82.
3. See the response to comment 3 of letter 82.

84

2 claim that livestock grazing allotments in management unit E-13 are in the "I" category.

3. Mr. Norsworthy and Mr. Whinnery would again like to reiterate that they are concerned with the excess numbers of big game wildlife, particularly elk, in the Gunnison Resource Area. These excess numbers of elk are causing resource and riparian damage. Before the BLM considers making further reduction in livestock grazing, it should "require" the Colorado Department of Wildlife to reduce elk numbers to acceptable levels.

Should you have any questions on these clarifications, please do not hesitate to contact me.

Sincerely,

DRAY, MADISON & THOMSON, P.C.

Karen J. Budd
 Karen J. Budd *by sc*

KJB/sr

cc: Chris Chella, Esq.
 Mr. Lamar Norsworthy
 Mr. Stan Whinnery.

STATE OF COLORADO

Division of Parks & Outdoor Recreation
 Colorado Natural Areas Program
 1313 Sherman Street, Rm. 618
 Denver, Colorado 80203
 Phone (303) 866-3437

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JUL - 1 1991

BLM-GUNNISON R.A.



Ray Baker
 Governor
 Ron C. Hodgin
 Director
 David W. Smith
 Program Administrator

June 27, 1991

Mr. Barry Tollefson, Area Manager
 Bureau of Land Management
 216 North Colorado
 Gunnison, Colorado 81230

Dear Barry:

Staff of the Colorado Natural Areas Program has reviewed the Gunnison Resource Area Draft Resource Management Plan and Environmental Impact Statement. We have the following comments on the draft Plan.

1 We recommend that the final Plan incorporate the proposed management direction and provisions described in Management Alternative D for riparian areas, special status plant and animal species and recreation management. In particular, the final Plan should note the recent listing of the Uncompahgre fritillary butterfly (*Boloris acrocnema*) as endangered by the U.S. Fish and Wildlife Service.

2 Several proposed areas of critical environmental concern deserve designation in the final Plan.

South Beaver Creek

3 The largest known population of the skiff milkvetch (*Astragalus microcymbus*), a plant known only from this part of Colorado (endemic, narrowly restricted range), occurs at the proposed South Beaver Creek ACEC/Research Natural Area. This plant is threatened by off-highway vehicle use and grazing. The plant is recommended for listing by the U.S. Fish and Wildlife Service under the Endangered Species Act. Skiff milkvetch is on List 1 (highest priority due to narrow geographic distribution, limited habitat availability and few populations) of the Colorado Plant Species of Special Concern list. The Colorado Department of Natural Resources and the BLM have signed a cooperative management agreement for South Beaver Creek. We recommend designation of at least 4565 acres as an ACEC/RNA as proposed in Alternative D.

Responses to letter 85

1. The PRMP incorporates many of the actions and recommendations from Alternative D regarding riparian areas, special status plant and animal species and habitats, and recreation management, but not all. See the description of the PRMP in Chapter Four for details.
2. See the response to comment 7 of letter 9. The pertinent sections in the DRMP have been changed to note this information. Thank you.
3. BLM feels that the management prescribed as a result of the recommended ACEC designations in the PRMP at Redcloud Peak and South Beaver Creek would provide the special management attention needed for these species and the habitat.

Colorado Natural Areas Council
 Robert R. Kelley, Chairman & Helen Taylor, Vice-Chairman
 Kirby Farley, Colorado Board of Parks and Outdoor Recreation
 The Jones, Member & Dennis Lutzell, Colorado Wildlife Commission
 Alden Narayan, Member & John Wilkes, Colorado Board of Land Commissioners

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APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Red Cloud Peak

85

The largest known population of the federally endangered Uncompahgre fritillary butterfly (500-1000 individuals) exists on the flank of Red Cloud Peak. We concur with the recommendation in the Plan to designate 5950 acres as an ACEC for butterfly habitat. The type locality for the butterfly at Uncompahgre Peak (USFS) is registered with the Colorado Natural Areas Program. The Program recommends that both butterfly populations at Red Cloud and Uncompahgre Peaks be included in a Colorado Natural Area for protection of the butterfly and its habitat.

Slungullion Earthflow

The Slungullion Earthflow is one of the best known, and well-studied, "slides" in the United States. It is proposed as a Colorado Natural Area; in fact, 351 acres of the upper earthflow on U.S. Forest Service land are designated a Colorado Natural Area. Addition of 1407 acres of BLM land recommended for ACEC designation in the Plan will complete the official recognition of the geologic importance of the Slungullion Earthflow to Colorado and the nation.

We concur with proposed ACEC designations for the Alpine, Haystack Cave and American Basin to provide management guidance to these scenic, biologically diverse and fragile areas. This package of ACECs in the Gunnison Resource Area contains a minimum representation of its spectacular natural values. Protecting these areas for present and future generations to visit and enjoy.

Sorry about our tardy response to the draft Plan. Too many balls in the air; I dropped this one. Thanks for a good job on the ACEC and species of special concern in the draft Plan. Be sure to let me know if we need to discuss our comments further.

Sincerely,



David W. Kuntz
Director
Colorado Natural Areas Program

dwk:00668



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405

86

Ref: BWM-EA

Alan L. Kesterke
District Manager
Bureau of Land Management
Montrose District Office
2465 South Townsend
Montrose, Colorado 81401

JUN 21 1991

SEARCHED	INDEXED	SERIALIZED	FILED
Received JUN 18 1991 BLM Montrose Colo.			

RE: Gunnison Resource Area
Resource Management Plan
and Draft EIS, Colorado

Dear Mr. Kesterke:

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act, the Region VIII Office of the Environmental Protection Agency has reviewed the Draft EIS for the Gunnison Resource Area Resource Management Plan and offers the following comments for your consideration.

Of primary interest to EPA are the plans adopted by BLM for the protection and enhancement of riparian areas, including wetlands and the important aquatic habitat within the portion of the Gunnison River basin drainage administered by BLM. The proposed Preferred Alternative (Alternative E) provides reasonable accommodation of commodity recovery, recreational values, and the protection of natural values. However, some aspects of Alternative D, which emphasizes a higher degree of protection, enhancement, and maintenance of natural values while providing a sustaining level of production of regional commodities, should be further evaluated in the Final EIS for the purpose of better riparian management. In particular, additional aquatic habitat protection and enhancement of biodiversity might be afforded within the Gunnison RMP with, 1) additional consideration of Areas of Critical Environmental Concern (ACECs) especially along streams, 2) expansion of river corridor protection through the provisions of the Wild and Scenic River Act; and, 3) further limitations on livestock management within riparian zones.

There are several Areas of Critical Environmental Concern (ACECs) along streams proposed in Alternative D which are not proposed for the preferred alternative. Consider, for example, the proposed ACEC along Cebolla Creek. The Cebolla Creek area meets the screening criteria since it has regional and nationally significant habitat primarily for Bighorn Sheep. In addition, Bighorn Sheep could be affected by disease carried by domestic sheep. Thus, there is a known threat to the natural resource

Responses to letter 86

1. See the response to comment 2 of letter 8. In addition, riparian area management for unit D-6, a recommended ACEC, and for the applicable part of unit E-10, would be accomplished according to Standard Management on pages 3-70 and 3-103, respectively. Those two sections are very similar. See also Management Unit 10 in the description of the PRMP for the management recommended for this area containing bighorn sheep habitat.
2. See the response to comment 37 of letter 50. Before any surface disturbance would occur on the public lands in unit D-1 that are not included in the unit E-8 recommended as an ACEC, BLM would request technical assistance from USF&WS regarding any potential impacts to; and mitigation for skiff milkvetch populations.
3. The BLM considered the contribution that the Lake Fork makes to the scenery in Segment A. The river is an important, but not major, element in the landscape and scenery of the area, which is dominated by steep mountains and valleys.

After further consideration, the BLM's conclusion in Appendix I of the DRMP, regarding the unsuitability of Segment A for inclusion into the National Wild and Scenic Rivers System, remains unchanged. The segment is not recommended for designation in the PRMP.

Hinsdale County officials oppose Wild and Scenic designation for Segment A for several reasons, including the potential erosion of a small tax base by acquisition of private lands. Other reasons include a concern that increased visitation would result in degradation of the resources in the segment, and a concern regarding implied or actual water rights issues.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

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1 values along Beaver Creek. The final EIS could specifically
display the relative potential affect upon this herd versus
continuing to provide the limited sheep grazing allotment in that
area. Also consider that the proposed South Beaver Creek ACEC
2 which contains populations of the skiff milkvetch, which has been
listed as a "Category II" plant recommended for endangered status
by the Fish and Wildlife Service, is not fully included as an
ACEC in the preferred alternative. Alternative D includes the
South Beaver Creek ACEC some 5000 acres larger than the ACEC
proposed for South Beaver Creek under preferred Alternative E.
3 Since the natural values here are also threatened by continued
grazing practices, the Final EIS should more thoroughly
investigate the relative economic and non-use values of these
alternative management approaches.

The RMP includes analysis of the eligibility, classifica-
tion, and suitability of the Lake Fork of Gunnison under BLM's
"Guidelines for Fulfilling Requirements of the Wild and Scenic
Rivers Act." Accordingly, only Segment A, the upper segment of
the Lake Fork was considered eligible for wild and scenic
designation. In part, this conclusion was based upon the free
flowing nature of the stream and the fact that this area is
associated with outstanding scenic values within BLM's Alpine
Triangle Special Recreation Management Area (SRMA) which has over
one-half million visitor-days annually. BLM concludes; however,
that this visitation is not river dependent since there is no
4 recreational boating and only limited fishery use. BLM may be
ignoring a contributing element of the scenic beauty in this
regard. Further, Appendix I indicates that this segment of the
river could be managed under the recreational classification
without acquiring private lands with relatively simple management
since BLM incorporates river protection within the SRMA. Support
from the Colorado Division of Wildlife indicating that Lake Fork
possesses "outstandingly remarkable scenic, fishery and wildlife
values" was received in 1980. Support from county officials for
recreational classification could be tied to maintenance of the
SRMA without concern for the loss of tax base. BLM should
re-evaluate the suitability of the upper segment of the Lake Fork
for inclusion in the Wild and Scenic River system as part of the
Final EIS process. Finally, only the remaining segment of the
Lake Fork was assessed under the Wild and Scenic Rivers Act.
Other significant stream segments within the planning area must
also be studied under the "Guidelines" process, or at least the
Final EIS should address why this analysis was not considered for
Cebolla Creek, Cochetopa Creek, South Beaver Creek, Tomichi
5 Creek, the Taylor River and all other appropriate streams within
the planning area.

4 The Final EIS should assess further limitations on timber
and livestock management within riparian zones. It is
particularly troubling that the proposed livestock grazing
management provides for a simplistic approach for just 2 1/2-inch

2

- Please refer to the response to comment 1 of letter 72. In addition,
the BLM did consider other streams in the Planning Area during the
study process. Please refer to page 1-9 in the DRMP for details
regarding Cebolla and Cochetopa Creeks. The BLM found that
neither of these streams were eligible due to a lack of
outstandingly remarkable characteristics. The Taylor River in not
within the Planning Area, and BLM manages no lands on this
stream. The other creeks referenced in the comment, and many
others were examined, and were found not eligible for inclusion.
Please refer to Attachment 2, Appendix I, in the PRMP, for a
complete list of streams that were analyzed in the study process,
and the reasons they were found not eligible.
4. Please see the revised Livestock Grazing Management section of
STANDARD MANAGEMENT in them PRMP. The 2 1/2 inch
minimum stubble height is for key herbaceous plants, the majority
of which would be grasses. Woody plants would not be included.
The 2 1/2 inch minimum is intended as an area wide guideline to
prevent damage to riparian areas caused by over use by livestock.
More intensive grazing strategies would be implemented on a site
specific basis with regard to the particular livestock operation and
the type and condition of the riparian areas. Forest management
would be practiced in riparian areas only after careful consideration
of the riparian values. In the judgement of BLM, the restrictions on
timber harvesting in riparian areas in the Preferred Alternative are
adequate to protect riparian values.
 5. Thank you for the suggestions. They were considered in the
development of the PRMP. The PRMP does contain many
strategies for livestock grazing in the Planning Area, for the life of
the plan.

85

4 stubble height for much of the riparian areas with 4-inch stubble
height applied elsewhere. In particular, it is not clear if such
stubble height measurements might be applied to stream-side woody
vegetation such as willows which certainly would be inappro-
5 priate for successful water quality, fishery, and range
management.

5 The RMP is the appropriate place to present a fully
detailed, planned grazing strategy. It would be expected that
detailed guidance for the utilization of riparian pastures should
be accomplished on the entire watershed with close coordination
with the Forest Service and private land owners. Among the
features a planned grazing strategy could include but not
necessarily be limited to are: 1) livestock removal in early
July to allow for regrowth, 2) summer limits of herbaceous forage
to less than 40 to 50 percent of current growth, 3) autumn use of
stream-side vegetation limited to 30 percent with the stubble
remaining at the end of the grazing season meeting the 4 to
6-inch stubble height criterion throughout the planning area,
4) season-long grazing should be limited to areas with access
control, such as, special pasture areas; and, 5) any critical
fishery habitats which includes most of the unique Gunnison
Resource Area, should be limited to stubble heights greater than
6 inches. (See Lewis H. Myers, 1989, "Grazing and riparian
management in southwestern Montana", Gresswell, Barton, Keshner,
eds., and "Practical approaches to riparian resource management:
an educational workshop", May 8-11, 1989, U.S. Department of the
Interior, Bureau of Land Management, Billings, Montana.)

Based on the procedures EPA uses to evaluate the adequacy of
the information in the EIS, and the environmental impacts of the
proposed action and alternatives, the Draft EIS for the Gunnison
RMP and Draft EIS will be listed in the Federal Register in
category EC-2. This means EPA has environmental concerns with
the proposed alternative based upon options that BLM has that
could further improve riparian area management and that
additional information is needed in the Final EIS as outlined
above.

Please contact Weston Wilson of my staff at 303/293-1439,
if we can further explain our concerns with the proposed plan.

Sincerely,


Robert R. DeSpain, Chief
Environmental Assessment Branch

cc: Chris Turk, National Park Service, Denver
Todd Robertson, Colorado Environmental Coalition, Denver

3

Town of Crested Butte 87

P.O. Box 39
Crested Butte, Colorado 81224
-A National Historic District-

Phone: (303)349-5338

July 1, 1991

Mr. Alan L. Kesterke, District Manager
Montrose District
Bureau of Land Management
2505 South Townsend Avenue
Montrose, CO 81401

Mr. Barry A. Tollerfson
Gunnison Basin Resource Area
Bureau of Land Management
Gunnison, CO 81230

Mr. Bill Bottomly, RMP Team Leader
Montrose District
Bureau of Land Management
2505 South Townsend Avenue
Montrose, CO 81401

Gentlemen:

The Crested Butte Town Council thanks the Bureau of Land Management for the opportunity to review the Draft Resource Management Plan/Environmental Impact Statement for the Gunnison Resource Area.

Most of our comments are based on issues raised by the Gunnison County Commissioners since we did not receive a copy of the plan until June 7, 1991 from the Gunnison County Planning Office. We have not had adequate time to review the whole document.

1. The Town agrees that livestock grazing should continue to be prohibited to help maintain the Town's water supply on the 320 acres on Wildcat Creek.
2. Like Gunnison County, we too are puzzled by the statement that commercial timbering could be allowed near or in riparian areas if wildlife values would be improved. Please give an example of that or do you plan to develop criteria to determine how this could occur?
3. Although off-road vehicle use is not proposed for the BLM lands in our immediate vicinity, we also agree with the County that the potential destructive impacts of off-road

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2. vehicles are well-known. No area should be open to ORV's until studies have been made to insure that the anticipated impacts will not be significant. An assumption of no resource damage in unstudied areas is irresponsible. Potential damage created by overuse, and/or seasonal misuse because vast areas have not been adequately reviewed for physical limitations benefits no user, including those whose main interests are in off-road vehicles.
3. 4. As suggested by the County, we would welcome a discussion with you about the proposed campground in the Slate River area to discuss the type, users, numbers and amount of amenities to be provided in such a campground. We recommend such a meeting be publicized to get additional input from other members of the public in this area.
4. 5. Potential development of the Rocky Point pumped back storage project should be referenced in this document, particularly in light of transmission line corridor impacts on private and public lands.
5. 6. Table 2-27 lists mountain biking demands in the Gunnison ERMA as "low." Consistently over the past few years, mountain bikers have commented that use in the area, is substantial, and would increase if more terrain were accessible. Nearly twelve years ago, a recreational study conducted by Harvard University identified the potential for this kind of use in the area. Crested Butte is known nationally as a mountain bike mecca. We do not understand how you came to your conclusion about mountain bike demand. In addition, we would appreciate any additional assistance you can provide in maintaining access to the "lowerloop" mountain bike trail which uses some BLM land in the Slate River area.
6. 8. We also agree that identified riparian areas should be identified on maps. In addition, we support the Bureau's decision to inventory riparian areas and prioritize their values to help determine site-specific management strategies. We especially support the concept that new water sources would be developed...with concern for the protection of riparian areas.
7. 9. The rate at which Allotment Management Plans have been completed (28 of 146 in the basin) raises questions of whether or not there is adequate funding to provide staff hours to devise plans and monitor results. Lack of completion of these AMPs jeopardizes both the individual rancher and the basin's ranching community. Has a realistic timetable been devised so that these AMPs can be completed? Given the reality of variable funding for the agency, is this a realistic program?

Responses to letter 87

1. One method of improving wildlife values while harvesting timber near riparian areas is to thin conifers adjacent to riparian areas in order to stimulate aspen growth, which would be available to beaver to help restore degraded riparian areas. Cutting of aspen in riparian areas would stimulate aspen sprouting, which could be used by elk and deer as winter forage. In addition, please see the responses to comment 4 of letter 81, and comment 11 of letter 63.
2. See the response to comment 23 of letter 35.
3. Please refer to the response to comment 6 of letter 63. In addition, we would solicit input from Crested Butte and other entities regarding facilities and improvements that would be proposed.
4. Please see the response to comment 11 of letter 81.
5. Please refer to the response to comment 14 of letter 81. In addition, the access problems on the "lower loop" mountain bike trail, based on our knowledge, concern conflicts between riders and private landowners. We have worked with mountain bikers in the area to obtain access across livestock fences we are constructing on public lands. Please contact us if we can be of assistance to you in these matters regarding public lands. Please also see the response to comments 4 and 5 of letter 63.
6. See the response to comment 15 of letter 81.
7. Please see the responses to comment 33 of letter 38, and 2, 3, and 4 of letter 50.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

87

Thank you again for the opportunity to review and comment on this draft. We look forward to meeting with you and working with you during the process of revision and implementation.

Sincerely,

Wesley A. Light
Wesley A. Light, Mayor

ROY ROYER
Governor



OFFICE OF THE STATE ENGINEER
DIVISION OF WATER RESOURCES

1313 Sherman Street, Room 818
Denver, Colorado 80203
(303) 866-3581
FAX (303) 866-3589

May 10, 1991

JERIS A. DANIELSON
State Engineer

88

RECEIVED

MAY 13 1991

DEPARTMENT OF
NATURAL RESOURCES

Responses to letter 88

1. The DRMP addresses resources on BLM managed lands only. If access is required across BLM managed lands, owners or users of water developments on private lands would continue to be permitted to apply for rights-of-way.
2. The only potential hydropower site under active consideration in the Planning Area is Union Park, to the best of our knowledge. The site would not effect any lands managed by BLM.

MEMORANDUM

TO: Steve Norris, Department of Natural Resources

FROM: Hal D. Simpson, Deputy State Engineer *Hal D. Simpson*

SUBJECT: Gunnison Resource Area Draft Management Plan and Environmental Impact Statement

We have reviewed the above referenced document. Several management proposals along with their projected impacts have been presented. We offer the following comments:

On page 3-6 - Soil and Water Resources - "Efforts to maintain watershed developments, i.e. in-channel structures and springs in good physical condition to reduce accelerated erosion will be continued."

1 | In relation to water resources, we note that numerous federal, municipal, and privately owned water diversion and storage structures are located within the management area. The document would be more complete if the existence of these structures was acknowledged, and provisions for required access and maintenance were recognized.

On page 3-54 - Water Power and Storage Sites - "The planning area would be open to the location of water power and storage reservoirs. Invented and identified potential water power and storage reservoir sites would be restrictively managed for these uses."

2 | Although Appendix "N" lists water resource developments which apparently belong to the Bureau of Land Management, there is no listing or map of the reservoir sites mentioned above. We consider hydropower development at the few feasible sites in the state to be in the interest of the state of Colorado and of national interest; therefore, we recommend that a listing or map of the designated water power or storage sites be added to the document.

HDS/JTS:c1f/69251

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

ORAL COMMENTS AND RESPONSES

Speakers at the public hearings held in Gunnison and Lake City are identified in Table P-2 below, along with the number of individual comments BLM responded to. The number assigned to each speaker is also shown.

The actual pages of the hearing transcripts applicable to each speaker's comments are reprinted following Table P-2, with speaker's key numbers shown in the

top right corner of each transcript page for the Lake City and Gunnison hearings, respectively. Each oral comment by the speakers on the transcript pages is highlighted by a bold, vertical bar and a number. The response to these comments is published beside the transcript pages. If a comment has already been responded to, the applicable response is referred to. The responses may be printed on succeeding pages, however, in order to economize on the number of pages required to be printed.

Table P-2

KEY TO ORAL STATEMENTS AND NUMBERS ASSIGNED TO INDIVIDUAL STATEMENTS AT PUBLIC HEARINGS IN GUNNISON AND LAKE CITY

NAME OF INDIVIDUAL SPEAKER	NUMBER ASSIGNED TO SPEAKER	NUMBER OF INDIVIDUAL COMMENTS
GUNNISON PUBLIC HEARING APRIL 17, 1991		
John Parker	G 1	1
Yosi Lutwak	G 2	4
Stan Irby	G 3	1
LAKE CITY PUBLIC HEARING APRIL 18, 1991		
Ed Toner	L 4	1
Stan Whinnery	L 5	4
Ralph Clark III	L 6	9
Bill Hall	L 7	3

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to oral statement G 1

G 1 20

1 MR. TOLLEFSON: Parker.
 2 MR. PARKER: Parker.
 3 MR. BERMAN: Parker. John, would you--
 4 MR. PARKER: Sure. My name is John Parker,
 5 and I wouldn't say I represented the business community
 6 in Lake City. I don't think anybody could make that
 7 statement. But I--first of all, I'd like to really
 8 thank you all for the amount of time and effort you've
 9 put into the Lake City area and all the time and the
 10 study and all the things you're planning on doing up
 11 there. I think you'll probably have a lot more interest
 12 in it tomorrow tonight. Unfortunately, I'll be out of
 13 town. That's the reason I'm here tonight.

14 But with the purchase of the Ryan Ranch and
 15 the access up to Powderhorn from that side, plus the
 16 scenic byways and the alpine triangle and the
 17 designation for the scenic 149 from Creede and something
 18 else, but anyway--I can't remember--it's going to bring
 19 more and more pressure in that whole area of your
 20 management. And right now, the Forest Service has, for
 21 some time, maintained a full-time person up there. And
 22 although you all have more land and more, probably, to
 23 worry about, BLM hasn't seen fit to have a full-time
 24 person up there. And really, I think a lot of the
 25 resource suffers as a result of it because we have a lot

1. The Gunnison Resource Area uses a centrally located office in Gunnison to manage activities on 585,012 acres of public land spread over a much larger area. The diverse resources we manage necessitate the skills of a variety of resource specialists. The BLM Recreation Specialist in Gunnison works to establish and maintain ties with Lake City. While this is perhaps not the best situation, we hope it meets the basic needs of the BLM, the city and the county. In the PRMP, BLM recommends that the possible construction of a joint BLM-Forest Service facility be pursued and evaluated. If the facility is constructed, BLM would more than likely assign at least one permanent BLM position, and perhaps several seasonal employees, to Lake City.

G 1 21

1 of theories and plans about where we want people and
 2 where we don't want people. But there's nobody there
 3 to, number one, tell them not to or, number two, do
 4 anything about it if they do, basically, on the whole.

5 And I also feel like the community needs
 6 somebody there that just doesn't come and work and goes
 7 back, to become more part of the community and
 8 understand where it is. So I guess more or less what I
 9 feel is that to put in place and manage what you say
 10 you're going to do means one of two things: Ideally,
 11 somebody that's going to live in Lake City. If not, it
 12 needs a person that works out of Gunnison who says, and
 13 everybody up there knows, "That is my responsibility,
 14 and I'm your man and/or woman" and can build a kind of
 15 relationship and rapport up there. And I think there's
 16 a lot of support from the community to help you do what
 17 you're doing, because it's all to our economic
 18 well-being. And basically, we'd like to see it done
 19 right and feel like it would build more teamwork and
 20 relationship up there to get it done if we had that kind
 21 of a designated person or person that lived up there.

22 MR. BERMAN: Thanks, John. The next person
 23 is--indicated as a maybe is Yosi--

24 MR. LUTWAK: Lutwak.

25 MR. BERMAN: Could you spell your first

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

G 2 22

1 name and last name.

2 MR. LUTWAK: Y-o-s-i L-u-t-w-a-k. I have a
3 few comments to make to save my writing. One is about
4 the game numbers in units--I think 54 and 66. You have
5 the Division of Wildlife recommendation that elk will be
6 3,000 and deer will be 6800. Right now deer are about
7 3800. So it's almost doubling the number of deer in our
8 area. And nobody from the DOW is here today, so I can
9 say I already hit four deer this early spring and
10 smashed the front end of my car twice. There are deer
11 everywhere, and it costs us a lot of money. They're
12 eating everything. You go out there, it's cropped down
13 to the bottom. I think you are the landowner, and you
14 need to designate animal land area and not the Division
15 of Wildlife. I think it's already overcarrying, and
16 it's becoming a problem.

17 My opinion's also that they should pay for
18 it. I think there should be--the program of charging
19 outfitters is really, in my opinion, misled. I think
20 that part of the license fee should go to the BLM for
21 managing the land, because that's where the money comes
22 from. And I know it's a political issue, but I think it
23 does need to be stressed that whoever makes money out of
24 deer and elk needs to pay for managing that land. And
25 I'd like to see the BLM write down numbers of their

Responses to oral statement G 2

1. The CDOW provides funds for the management of wildlife habitat on lands managed by BLM and other agencies through cooperative agreements. In 1991, the CDOW contributed \$3,000.00 to BLM for habitat improvement projects, and in 1992 they will contribute approximately \$12,000.00 more.
2. Please see the response to comment 3 of letter 35.
3. Please refer to the response to comments 7 and 10 of letter 51.
4. Please refer to the response to comment 2 of letter 51.

G 2 23

1 estimate of how much it can carry rather than DOW does
2 that.

3 Data that you used for the grazing
4 allotments is pretty old. I think it was taken in 1977.
5 And it was after the drought--about a decade and a half
6 ago. I think it's out of date, and it was done in the
7 year after the worst drought this country has seen. And
8 I don't think you can base a lot of this stuff on this
9 old data. If you make any decision about grazing or
10 wildlife, I think you need newer data, and that hasn't
11 been followed as I think it should have.

12 Indian Creek, which is out in Powderhorn,
13 is designated as a fishery stream. And I talked, I
14 think, last week with Art Hayes about it. First of all,
15 it is not a fishery stream. As far as anybody knows, it
16 never has had fish in it. So I don't think it should be
17 designated a fishery stream. It may be designated an
18 interzittent stream that should be turned into a stream,
19 but not designated as a stream that has fish in it,
20 because nobody has ever seen fish in it.

21 As I talked with Art, the problem that
22 Indian Creek has, why it is intermittent, is probably
23 because it was overlogged, and it's very bare, comparing
24 to the rest of the area. And it--so it has a very fast
25 melting period, and then it dries up, and that's

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

G 2 24

1 probably why it doesn't have any fish surviving in it.
 2 I've been fighting you guys for two years from logging
 3 up there, and one of my main issues is it melts too
 4 fast. So you want to limit the cows because the forage
 5 turns into the riparian area, which means moving the
 6 cows out. But I don't see you doing any other efforts
 7 to turn it into a fisheries stream. I think it should
 8 not be logged. I think that's the main problem that we
 9 have is it melts too fast, and you have pressure from
 10 somebody, I guess, to log it. And it's very easy to
 11 say, well, leave the stubble high, 4 inches, because
 12 then the ranchers don't have to worry about it, but we
 13 don't have to stop logging.

14 If you're serious about turning a stream
 15 into a--what you call it, a fishery stream, then it
 16 should be really serious. And you should do whatever it
 17 takes, not just get the cows off it. And maybe getting
 18 the cows off it earlier will do good, but it's not the
 19 only thing that needs to be done there. There are a lot
 20 of other things that need to be done.

21 MR. HERMAN: You have one minute left.

22 MR. LUTWAK: Okay. The last thing is your
 23 SRMA thing for the--I forgot what it stands for, but
 24 managing the area from above Lake City all the way down
 25 to Lake Fork. A few years ago we had a fight about it,

G 2 25

1 of separating the lower Lake Fork from the upper Lake
 2 Fork. It is totally different country. The upper there
 3 is tundra, and the lower land is like the rest of
 4 Gunnison County. And even your studies show that most
 5 of Lake Fork does not fit the designation of wild and
 6 scenic, while the upper end may. So I would like to
 7 make a comment, again, that it should be separated. It
 8 should not be one game management up there with a long
 9 snake coming down north; that it should be separate. It
 10 should not be under the same management plan.

11 That's all I have to say. Thank you.

12 MR. HERMAN: Thank you. Would anybody else
 13 like to make any comments at this time?

14 MR. IRBY: I'm Stan Irby, president of
 15 Gunnison Stock Growers, and I'd like to make one comment
 16 at this time dealing with your planning issues and
 17 criteria. You dealt with livestock and the management
 18 of livestock in the first three issues in this item.
 19 But on No. 4, we've got, in view of the importance of
 20 recreation and tourism for local economies, what steps
 21 can be taken to improve recreation diversity and
 22 opportunities while preserving the resources necessary
 23 for desirable recreation settings? I think we need to
 24 include in that statement, "In view of the importance of
 25 recreation and tourism and agriculture and the

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to oral statement G 3

25

G 3

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22 *opportunities while preserving the resources necessary*
23 *for desirable recreation settings? I think we need to*
24 *include in that statement, "In view of the importance of*
25 *recreation and tourism and agriculture and the*

- 1. Please see the response to comment 40 of letter 38 regarding Issue No. 4 in the DRMP.

26

G 3

1 integration of those items for local economies," and
2 then continue with "what steps can be taken to improve
3 recreation diversity and opportunities for agriculture
4 and tourism to maintain the current level in the
5 economy?" I think in time we're going to see, as we see
6 more encroachment on federal lands and on private lands,
7 as far as the restrictions that we're faced with, you
8 guys are going to be in a position that you need us as
9 much as we need you. If we lose the ability to run
10 livestock on the BLM lands, it puts a great deal of
11 hardship on us as far as staying in the business in this
12 country. If we aren't in the business in this country,
13 we're going to lose the steady value that we provide for
14 the valley. A lot of irrigated meadows will not exist.
15 There may be home sites on them. It depends on what
16 happens. But I'd like to see that included in an issue
17 and part of the criteria in this planning statement.

18 MR. HERMAN: Okay. Thanks. Stan, is
19 there--would anybody else like to make a comment? If
20 there are no other comments, let the record show that I
21 closed these proceedings at 8:02. The proceedings are
22 now closed.

23 (WHEREUPON, the public hearing was closed
24 at 8:02 p.m.)
25

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Responses to oral statement L 4

L 4 18

1 plan is developed, we would develop a special
2 management plan for each of those units that would
3 address management to deal with whatever issue was the
4 focus of that, that particular unit.

5 Thanks, Arden, I skipped over that when I
6 was talking about management units. With that, I think
7 I'll turn it back to Ken and let him go on with the
8 hearing.

9 MR. HERMAN: We'll get into the part of
10 the hearing now where we take testimony. And again,
11 please keep your testimony to five minutes or less.
12 Are there any federal or state representatives that
13 would like to testify? I see that there's not any. Is
14 there any local agencies that would like to testify? I
15 have, here, Ed from the county commissioners. Would
16 you like to testify?

17 MR. TONER: I'm Ed Toner, Hinsdale County
18 Commissioner and president of the Colorado Water
19 Congress. I have a couple items that I'd like to pass
20 on. And the first one, I'd certainly like to commend
21 the BLM, all of you, and, certainly, the Department of
22 the Interior for your public statement on the water
23 issues, in recommending that there be no express water
24 rights in your downstream BLM-recommended wilderness
25 areas. I think that is just, really, what is very

L 4 19

1 necessary, and I want to commend the Department of the
2 Interior for that. That's very necessary.

3 The other thing that I--and this is going
4 to be a commendation also--just what Barry was saying
5 there at the last, on the recommendation of wild and
6 scenic river. That is probably one of the--waterwise,
7 is one of the most orneriest bills that has ever been
8 passed by our Congress, in the very fact that when you
9 do put in a wild and scenic river, you've just opened
10 it up and publicized it, for every person in the world
11 to come there and tramp it down, you know, destroy the
12 very pristine thing that you're trying to preserve.
13 And by not designating it as a wild and scenic river,
14 you've really done a great job.

15 And those are the two statements I wanted
16 to make. Thank you.

17 MR. HERMAN: Thank you, Ed. Are there any
18 other local officials that would like to talk at this
19 time? If there are none, the next person I have on the
20 list is Stan. You had a question mark. Would you care
21 to make some comments?

22 MR. WHINNERY: Yes. My name is Stan
23 Whinnery, and I represent Whinnery Ranch and the San
24 Juan Range Users Association. And throughout all of
25 the alternatives, including the preferred, there seems

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

L5 19

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23 Whinnery, and I represent Whinnery Ranch and the San
24 Juan Range Users Association. And throughout all of
25 the alternatives, including the preferred, there seems

L5 20

1 to be things that were printed, that there was a link
2 between the lungworm and bighorn sheep and domesticated
3 sheep passing that on. I'd like to state for the
4 record that almost all the sheep that are ran in the
5 San Juan mountains are all vaccinated and dewormed, for
6 lungworm especially, and almost every other disease
7 that is known to domestic sheep.

8 Secondly, on livestock trailing and stuff,
9 I think that's an issue that needs to be looked at even
10 more, on public input and sentiment-type stuff.

11 Also, on the wildlife--I mean, the
12 Uncompahgre Butterfly, you've moved--in some of the
13 plans, you've moved vehicle traffic and
14 grazing-livestock usage. But the one thing that needs
15 to be considered, especially in the Silver Creek
16 Drainage by Burrows Park, is the foot traffic; that the
17 BLM had built a trail that almost passes right near the
18 butterfly breeding ground. So I think that needs to be
19 looked at.

20 And, you know, other things that apply to
21 grazing, four-inch stubble height, some areas that's
22 going to be a difficult thing to maintain without
23 drastic measures.

24 And that's about all I have to say. Thank
25 you.

Responses to oral statement L 5

1. The BLM also has a concern regarding hikers and recreationists that pass through habitat utilized by the Uncompahgre fritillary butterfly. To reduce potential impacts, the recreation program in 1990 rerouted a portion of the trail. We plan to continue monitoring the recreation activity in the area.
2. Please see the revised Livestock Grazing Management section of STANDARD MANAGEMENT in the PRMP.
3. Please refer to the response to comment 1 and 2 of letter 20. The prescription for the referenced unit is changed in the PRMP.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

L5 21

1 MR. BOTTOMLY: Mr. Whinnery, may I ask a
2 clarifying question?

3 MR. WHINNERY: Um-hum.

4 MR. BOTTOMLY: Regarding the livestock
5 trailing you gave us to lead off your presentation,
6 could you give us a little more insight on what we need
7 to look into.

8 MR. WHINNERY: For instance, in 1930 on
9 the Ridge Stock Driveway, which is the Forest Service
10 land, there were 140,000 sheep that went up the Ridge
11 Stock Driveway. 1991, there were 4,000 sheep went up
12 the Ridge Drive. And that's not a high-usage area by
13 the public.

14 The other side of the coin is American
15 Basin, Cinnamon Pass, Engineer Pass. Those are highly
16 used by public, and they're also used by less than
17 10,000 sheep. Certain areas like American Basin, I'm
18 not against moving the sheep--so to speak,
19 out-of-sight, out-of-mind type of a theory or
20 management plan--either in early, before the people,
21 the public, arrive or there after the public leaves,
22 you know. I think to abolish it completely is kind of
23 asinine.

24 But really, that's what I mean. It can
25 all be worked out. I believe that as far as the sheep

3

L6 22

1 raisers and the cattle people--the sheep raisers that
2 are in the San Juan Range Association--are concerned, I
3 believe they're willing to work on some kind of a deal
4 in that.

5 MR. BOTTOMLY: Thank you.

6 MR. HERMAN: The next person that I have
7 is Ralph Clark. Did you wish to make a statement?

8 MR. CLARK: Yes, I did. My name is Ralph
9 Clark. I'm from Gunnison, and I'm representing
10 myself. I, too, want to commend the document. I think
11 you've done a superb job. I will be commenting later
12 in more detail, but at this point, perhaps, just
13 covering some generalities and a couple specifics.

14 First, I certainly appreciate the time
15 that you have this open for review. It is a long
16 document. I've read about four-fifths of it, and
17 there's a lot there that needs to go back and be
18 studied.

19 Also, now more specifically, in terms of
20 roads, I'd suggest someplace in the final that there be
21 a consideration given to maintenance of roads. One of
22 the difficulties you've had recently with the wet
23 hunting season is a lot of tearing up of the roads and,
24 as a consequence, a lot of erosion, sediment lost,
25 along the road surface. Some way of maintaining that

1

Responses to oral statement L 6

1. Roads would continue to be maintained based on priorities and funding. Please also see the responses to comments 22 and 23 of letter 35.
2. Please see the response to comments 2 and 3 of letter 35.
3. An overview of water quality conditions within the Gunnison Resource Area can be found on page 2-12 of the DRMP.

The BLM is not presently involved in water quality studies in the Gunnison Resource Area. However, the BLM does have an active water quality inventory and monitoring program in the resource area, with a short-term goal of establishing baseline water quality conditions. Please also see the response to comment 4 of letter 35.

4. In the judgement of BLM, the Riparian Zones management for the Preferred Alternative, and that in the PRMP, is sufficient to provide for the control of recreation and other activities in the event that negative impacts to riparian values is occurring. Please refer to the responses to comment 14 of letter 82, and comments 22 and 23 of letter 35.
5. The Dry Gulch riparian area and the associated watershed are being evaluated for the potential to improve the watershed condition, livestock forage and to reduce sedimentation to downstream lands.
6. Please refer to the response to comment 5 of statement 6. In addition, Management activities in Long Gulch are detailed in a watershed activity plan titled "Long Gulch Sediment Control and Riparian Habitat Improvement Project" - reference number CO-037-EA5-002. Copies of the plan are available from the Gunnison Resource Area Office.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

L6 23

would be very useful, in terms of planning for sediment control.

There needs to be, I think, some updating of the data. Certainly, the census has indicated very different figures from the figures you got from the State demographer, at least for Gunnison County. I think for some of the others also. I think it would be helpful if you could update the data with regard to the grazing. I believe most of that comes from the 1987 range management--I forget the title of it. But somehow or another, if you could include current-use levels, current or perhaps even tracking, in terms of certain allotments, what the use of record has been since 1987 up to the current would be helpful. The same probably would be true of recreation use.

Down the road, it would also be helpful, I think, to give some indication of water quality and perhaps the indication of being able to participate in some water-quality studies. As you know, in the Gunnison Basin there are some that are about to be undertaken, as well as those that are ongoing.

I certainly support, very strongly, the emphasis on the riparian management. I think that's needed. I think that it would be very helpful toward protection, restoration, and enhancement. Certainly,

7. The existing situation regarding The Lake Fork of The Gunnison River is different than that on the Dolores River. A majority of the Lake Fork is along private lands, and fishing use is moderate while rafting and kayak use is low to moderate. Commercial outfitters outside the local area do not use the stream to a great degree because of the short use season and unpredictable flows. The current and projected levels of use, and the accompanying lack of serious commercial use problems do not indicate a strong necessity to limit and further regulate river use. Many aspects of river management pertaining to the Dolores River are contained in the Alpine Triangle Recreation Area Management Plan. If situations along the Lake Fork change in the future, BLM would reexamine the existing management policies and consider other management options.

8. Please see the response to comment 2 of letter 8 regarding the East Gunnison potential ACEC. In the PRMP, the area was not recommended for designation for the reasons stated in the subject response.

9. Please see the response to written comment 8 of letter 63.

L6 24

also, the emphasis on erosion control. I think at some point in the final, there needs to be further consideration for management of recreational use.

Again becoming a bit more specific, I'm not clear, really, with respect to the preferred alternative, what the plans are for the Dry Gulch area. Certainly, I, as you know, have indicated my personal interest in cooperating with the BLM and the DOW for improvement of the Dry Gulch area. Grazing usage on that area has dropped. And certainly, this appears to be an opportunity to begin the restoration of that basin.

Also, that basin is the producer of a tremendous quantity of sediment. And perhaps something similar to what has been done on Long Gulch might be appropriate for the Dry Gulch Basin. In terms of the document, I think it would be helpful to include a bit of a description on Long Gulch and what happened and the management principles behind it, to further explain the frequent references to that particular site.

I would suggest, for the Lake Fork, doing something similar to what's been done on the Dolores. I think that the river management study that recently was done is an excellent document, and I think it would be very helpful on the Lake Fork.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

L 6 25

The ACECs, I guess I'm sort of biased. I would encourage use of the ACEC designation for the area somewhat northeast, or at least northeast of Gunnison, north of U.S. 50, and, basically, the Dry Gulch, Cabin Creek, and so on area.

And also, in terms of my interest in water, I'm rather fascinated and would encourage explanation of the concept of getting instream rights for the water flows. If you can do it, it sounds great. I think you'd be setting a precedent that would be very helpful for the protection of the riparian habitat and fishery resource. And I would encourage you to pursue that effort in the areas that you've indicated in the document. Thank you.

MR. HERMAN: Thank you.

MR. BOTTOMLY: Ralph, may I ask one clarifying question, please. I'm sure you'll be more specific in your written comments regarding the specific grazing data that needed to be updated. But just for my benefit, at this point in time, are you referring to actual use, annual actual use: statistics, et cetera?

MR. CLARK: Yes. Let's see if I can dig out the--I think it's the Gunnison--this is a--

MR. BOTTOMLY: The Range Program Summary?

L 7 26

MR. CLARK: The Range Program Summary Update. And the figures that were given in the appendix for this document, basically, are the '87 figures that come out of here. There ought to be some more current figures, I think.

MR. BOTTOMLY: Thank you.

MR. HERMAN: Thanks. That's the last of the people that indicated, when they signed up, that they would like to provide testimony. Is there anybody else here that would like to provide testimony?

MR. HALL: I'm Bill Hall, Lake City, and I'm in the real estate business. I own some ranches, although I'm not a rancher. And I'm a taxpayer, maybe primarily.

In regard to range management, with some experiences just in the last few days, I would like to state for the record that it sure would be a lot easier on all the ranchers if we had some common guidelines to go by between the BLM and the Forest Service. I know that's not something you all can do, and I know that dividing it up in sections of the country never got through Congress a few years ago. But it certainly is a mess right now to try to deal with both agencies, particularly if they're both involved in the same grazing allotment. Right now, I'd certainly like for

Responses to oral statement L 7

1. Thank you for the comment. This issue is always a concern among the two agencies, and not only regarding livestock management. We will continue to work on coordination for better resource management.
2. Please refer to the response to comment 1 for oral statement G 1.

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

L7 27

1 it to be the BLM that rules.

2 The second thing is, I have been involved
3 in the potential recreation and activity center here in
4 Lake City, which is mentioned again in this report. I
5 think it would be great for Lake City, and I'd love to
6 see that. I'm a little concerned that there's no money
7 in the budget for that. I don't know if there is even
8 within the ten years, but maybe we could get something
9 done in the time frame.

10 Places that that would possibly be
11 suitable for in Lake City are limited. There was an
12 offer to the BLM and Forest Service and the County
13 combined, I think a couple years ago, at a reduced
14 price. And nobody could make the decision or had the
15 money to do that. The Forest Service does own some
16 property in town. It was suggested that that could be
17 at least sold off to the public, to provide the money
18 to buy the other piece. I understand the Forest
19 Service regulations would not allow that. If they sell
20 that, they have to use that money for something else
21 which, again, doesn't make any sense to me.

22 But I think that brings me to the next
23 point, and that is that even if you are going to build
24 a center here, I think the County has got to look at,
25 Are you taking some more land off the tax rolls that

L7 28

1 the remaining few taxpayers have to support? I think
2 we have to figure a way to compensate this County by
3 putting other lands back on the tax rolls, if you're
4 taking lands off.

5 The recent acquisition of the ranch out
6 here to the north is great for the public to get into
7 the high country. I have no problem with that. But I
8 do have a problem with taking it off the tax rolls
9 without, in some way, lessening the burden of the local
10 taxpayer. I think that's got to be something we've got
11 to address, because we're going to die in this county
12 if we don't. Our taxes went up on vacant land,
13 unagricultural, 20 percent last year; on residential,
14 14 percent. It doesn't take very long for that to run
15 everybody out.

16 Thank you.

17 MR. HERMAN: Thank you. Would anybody
18 else like to have testimony? If not, I thank you all
19 for showing up and particularly those who testified.
20 And if there are no other public comments, let the
21 record show that these proceedings are closed at 8:13.
22 And with that, we'll go on with more informal,
23 one-on-one discussions with anybody.

24
25

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

DISTRIBUTION OF THE DRMP

Over 600 copies of the DRMP were distributed to individuals, federal, state, and local agencies, elected officials, private interest and other groups and organizations, schools, businesses, libraries, land users, and others. Distribution was by use of volume mailing by the printer and in response to individual requests for the document. Copies of the document were also available for public review and distribution in the BLM's offices in Denver, Gunnison, and Montrose.

The cover letter in the DRMP solicited comments from all recipients and reviewers. The distribution list for the DRMP is included below.

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APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

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Assistant Secretary
Bolling Air Force Base

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United States Department of Energy

Grand Junction, CO

Oak Ridge, TN

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Bear Claw Ranch

Black Canyon Corner

Bratton & Associates

Buttes Resources Company

Club 20

Coal Creek Angling Service

Colorado Counties, Incorporated

Colorado Ute Electric Association

Crested Butte Rafting

Delta/Montrose Electric Association

Design Shop

Earth Sciences, Inc.

Forest Queen Mine

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

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High Country Outfitters Inc.
High Country River Rafters
Homestake Mining Company
Hugh Corrigan IV, Atty at Law
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Bomar, Jimmie
Braden, Dennis
Bullington, Burton J.
Bullington, Sandra M.
Cassidy, John V.
Chuchuru Brothers
Cimarron Land
Cole, Junior A.
Cole, Roger
Coleman, Melvin
Collins, Russell
Collins, Russell H.
Colorado-Utah
Crosson, David L.
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Delany, Robert
Deltonto, Joe
Denison, Jerry
Dunbar Ranches
Elze, Richard & Ochs
Elze, William
Fandrigh, J.W.
Field, Fred
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Glivar, James F.
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Harris, Elma L.
Hazard, Helen Estate

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Howard, Michael R.
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Irby, Stan
Jiminez, Joe II
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Leonard, Ralph E.
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Lester, Freeman
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Phelps, Lawrence
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Reece, Peggy Lue
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Ryan, James H.
Sammons, Jim
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Seay, Charles E.
Sharp, Robert N.
Snyder, Terrell

Soderquist, Andrew A.
Soderquist, Dean L.
Soderquist Ranches
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Spann, Virgil and Lee
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Stratman, James
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Taramarcaz, Lee
Vader Cloverleaf Ranch
Vader, Harry
Vader, P&J Ranch
Van Tuyl Ranches
Veo, Mae
Vickers Brothers
Ward, J. S.
Ward Ranches, Inc.
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Whinnery, Robert
Wilson, John Adams
Wilson, Richard B.
Wilson, Wendell
Wisely Family Trust
Wright, Burton
Yocum, Grace E.
Youmans, Cora
Youmans, Joseph
Youmans, Patrick I.

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Colorado Environmental Coalition
Colorado Mining Association
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Colorado Native Plant Society
Colorado Off-Hwy. Vehicle Coalition
Colorado Timber Industry Association
Colorado Trail Riders
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Gunnison County Stockgrowers' Association
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APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

Hinsdale County Historical Society
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KREX Television
KREY TV
KSTR AM & FM Radio
KVLE FM Radio
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Silver World Publishing
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The Chronicle

PERSONS

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Gibbs, Phillip Paul
Goodhue, Dennis D.
Greenwood, Walter P.
Gregory, Lee
Hall, Dan
Hall, Denis B.
Hall, William and Ruthanna
Hansen, John

APPENDIX P - COMMENTS ON THE DRMP AND BLM RESPONSES

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Hodges, Jay
Hogue, Claudia
Holcomb, Michelle
Holderfield, Thomas L.
Hurd, Robert
Hyde, Bob
Inge, Bob
Jameson, Hugh S.
Johnson, Ken
Johnson, Wade
Jones, Doug
Juiata, Cristi
Julianskodje, Beth
Keables, T.
Keidel, Jeffry
Kenyon, Tom
Kilgore, Mrs. Herman G.
Kuhn, Russ
Laird, Hubert
Larson, Steve
Lehr, Paula J.
Lannes, Dewey
Lorah, Darrel G.
Mall, James
Marencik, Pam
Markey, Joseph W.
Martin, Amy
Mason, Edna
Mason, Philip
Maurus, John K.
Maxson, William & Mary
McConkey, A.
McCormick, Don E.
McCulloch, Robert W.
McLain, David
Naslund, Dave
Oehlkers, Ron
Olson, Paul G.
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Ft. Lewis College
Rocky Mountain Biological Lab
Rocky Mountain Law Foundation
University of Colorado
University of Illinois
University of Nevada-Reno
Western State College

APPENDIX Q

RECOMMENDATIONS FOR ACTIVITY PLAN PREPARATION, REVISION, OR UPDATING

This Appendix consolidates recommendations made in Chapter Four regarding the preparation or updating of a variety of activity level plans, such as Recreation Area Management Plans (RAMPs) or Cultural Resource Management Plans (CRMPs). Also included are the recommendations from Chapter Four regarding the preparation of integrated, comprehensive, and coordinated multi-resource level activity plans. The plans are referred to in the PRMP as Coordinated Resource Management Activity Plans (CRMAs). This Appendix also consolidates the recommendations made in Chapter Four that would require certain or all resources to be incorporated or considered during the preparation, revision, or updating of either single resource activity level plans or CRMAs. The actions under the header "ACTIVITY PLAN RECOMMENDATIONS IN THE STANDARD MANAGEMENT SECTION" would, unless otherwise noted, apply to the entire Planning Area. The actions under the header "ACTIVITY PLAN RECOMMENDATIONS IN MANAGEMENT UNIT PRESCRIPTIONS" would apply to specific Management Units. Any proposed single resource activity plan could be combined into a CRMA if appropriate.

ACTIVITY PLAN RECOMMENDATIONS IN THE STANDARD MANAGEMENT SECTION

RECOMMENDATIONS TO PREPARE, DEVELOP, UPDATE, OR REVISE ACTIVITY PLANS

- page 4-5: **Wildlife Habitat Management.** The Habitat Management Plan (HMP) for the Planning Area would be revised and implemented consistent with BLM's Fish and Wildlife Plan for Colorado - Program for the Decade. The HMP would prescribe land use and species management guidance for the mutual benefit of wildlife, fish, special status plant and animal species and habitat, and other resources on public lands. Objectives of the revised HMP would include, but would not be limited to, methods to manage public lands to help meet, within carrying capacities of the habitat, CDOW long-range herd goals, maintain or improve vegetation communities to benefit both game and non-game wildlife, implement a program to increase the quantity and quality of crucial big game winter range, and implement cooperative plans and projects with CDOW and other organizations to maintain or enhance big game and/or upland game habitats.
- page 4-11: Existing and future activity plans, such as AMPs or CRMAs, would, based on staffing capabilities, be evaluated and either modified or revised as necessary, using a coordinated, interdisciplinary approach. New activity plans would also be developed with interdisciplinary input and consultation with permittees and other affected interests. Activity plans would incorporate allotment specific objectives for maintaining or improving livestock forage, wildlife and fish habitat, and riparian areas. Activity plans would also prescribe management actions including grazing practices, range improvements, changes in season of use, and other management actions to achieve allotment specific objectives. Innovative or non-traditional management strategies would also be considered.
- page 4-12: One Planning Area-wide Forest Management Plan (FMP) would be completed that would incorporate and update the two existing FMPs.
- page 4-13: A CRMA for the Alpine Triangle SRMA would be prepared that incorporates appropriate actions contained in the existing Recreation Area Management Plan

APPENDIXES

(RAMP) and the prescriptions for Management Units 1, 4, 5, 6, and that part of unit 15 located in the SRMA.

- page 4-13: In Management Unit 2, public lands in the Powderhorn Primitive Area SRMA would be managed for primitive and semi-primitive, non motorized recreation and scenic opportunities and for the maintenance and enhancement of natural values. A RAMP would be prepared and would include goals within BLM's Recreation 2000: A Strategic Plan.
- page 4-14: Protection of cultural resources would be considered in all activity plans.
- page 4-14: Wilderness Management Plans would be prepared for any area(s) designated and the area(s) would be managed as wilderness.
- page 4-15: A land sale/disposal activity plan would be prepared for Category I lands, indicating disposal techniques, priorities, and implementation timing.
- page 4-15: The transportation plan map would be updated.
- page 4-16: A site-specific burn plan and Environmental Analysis (EA) would be prepared prior to authorizing any prescribed burns.

RECOMMENDATIONS TO INCLUDE, INCORPORATE, OR IDENTIFY CERTAIN RESOURCES/RESOURCE USES IN ACTIVITY PLANS

- page 4-2: Specific, desired plant communities would be identified in activity plans. Exceptions to a late seral ecological status needed to meet objectives would be identified in activity plans.
- page 4-2: Site-specific riparian management strategies, projects, or improvements would be included in activity plans and would be implemented by priority, as to be determined by riparian area inventories.
- page 4-8: In Management Units 14 or 15, the 4 inch stubble height requirement would be incorporated into all existing activity plans in these two management units, since existing plans do not adequately address riparian concerns. When outdated activity plans are evaluated, modified, or revised, riparian concerns would address the following management guidance: site specific objectives would be consistent with riparian area goals established in this plan for Management Units 14 and 15.
- page 4-8: In all riparian areas, except in units 14 or 15, the 2½ inch stubble height would be incorporated into all existing AMPs or other activity plans. When outdated activity plans are evaluated, modified, or revised, riparian concerns would address the following guidance: site specific objectives would be consistent with riparian area goals established in this plan, including the maintenance, restoration, or improvement of riparian conditions (hydrologic, soil, and vegetation) and natural values.

page 4-9: *Range Improvements*

Structural and non-structural range improvements such as fences, water developments, burns, spray treatments, and others would continue to be identified and prescribed in activity plans or grazing agreements. This would facilitate livestock management to achieve specific management and resource objectives defined in activity plans or agreements.

page 4-12:

Range readiness would be incorporated into existing AMP's utilizing the criteria specified in Appendix B. This would provide flexibility for early turnout on areas that have adequate time for plant and riparian system recovery. On allotments with AMP's or other activity plans, plan objectives and actions would also be considered when determining turnout dates. However, readiness criteria for allotments with AMP's or other activity plans would be specific to the allotment and/or areas within it. Range readiness criteria as documented in Appendix B would be used until specific criteria can be incorporated into each AMP or other activity plan.

page 4-12:

Monitoring

- 9) Ecological site inventories for uplands and riparian areas would be conducted in preparation for activity plans as needed on category "I" allotments. This would be done as part of the activity plan preparation process, and as funding and personnel allow.

page 4-16:

Activity plans would consider the remediation of known hazards.

ACTIVITY PLAN RECOMMENDATIONS IN MANAGEMENT UNIT PRESCRIPTIONS

RECOMMENDATIONS TO PREPARE, DEVELOP, UPDATE, OR REVISE ACTIVITY PLANS

page 4-18:

In Management Unit 1, and the Alpine Triangle Special Recreation Management Area (SRMA), A CRMAPP would be prepared, incorporating the management actions in the existing RAMP, Recreation 2000 goals and the back country byway, the Alpine Loop Cultural Resource Management Plan (CRMP), historic site management, visual resource management, and the resources in all management units in the Alpine Triangle SRMA.

page 4-19:

In Management Unit 1, the Alpine Loop CRMP would be prepared to direct the development, maintenance, stabilization, and interpretation of these appropriate historic resources for passive, non-consumptive recreation opportunities in Management Unit 1. This plan would be incorporated into the CRMAPP for the unit and the Alpine Triangle SRMA. Interpretation would emphasize the protection of historic sites, buildings, and facilities in order to prevent vandalism. Management for units 4, 5, 6, and part of unit 15 would be incorporated into the CRMAPP.

page 4-21:

In Management Unit 2, the Powderhorn Primitive Area SRMA, a Recreation Area Management Plan (RAMP) would be prepared, emphasizing the enhancement of natural values and primitive recreation opportunities.

APPENDIXES

- page 4-26: In Management Unit 7, the West Antelope Creek ACEC, a CRMAPP would be prepared. Management for unit 9 would be incorporated into the CRMAPP.
- page 4-28: In Management Unit 8, the South Beaver Creek ACEC, an integrated ACEC management plan would be prepared.
- page 4-29: In Management Unit 10, a HMP would be prepared.
- page 4-32: For Management Unit 12, a HMP or a CRMAPP would be developed focusing on overall habitat improvement and intensive habitat management. The plan would include treatments and projects in uplands and riparian ecosystems to increase the production and composition of bitterbrush, serviceberry, mountain mahogany, willows, and cottonwoods. Methods would include shrub plantings, burning, and techniques to convert decadent sagebrush stands to stands dominated by young sagebrush plants in the uplands.
- page 4-33: In Management Unit 13, activity plans, such as CRMAPPs or AMPs, would be developed, and existing AMPs would be updated as needed using CRMAPP standards and procedures. Existing range improvements and treatments would be maintained and new range improvements and treatments would be developed according to updated or new activity plans.
- page 4-36: For Management Unit 15, the Resource Area HMP would be revised to include the recommendations in the Management Unit prescription.

RECOMMENDATIONS TO INCLUDE, INCORPORATE, OR IDENTIFY CERTAIN RESOURCES/RESOURCE USES IN ACTIVITY PLANS

- page 4-23: For Management Unit 4, the American Basin ACEC, specific and detailed management would be included as part of the CRMAPP to be prepared for the Alpine Triangle SRMA, Management Unit 1.
- page 4-24: For Management Unit 5, the Redcloud Peak ACEC, specific management of resources would be incorporated into the CRMAPP to be prepared for the Alpine Triangle SRMA, Management Unit 1.
- page 4-25: For Management Unit 6, the Slumgullion Earthflow National Natural Landmark ACEC, specific management for resources, including interpretation of the earthflow and other natural values in the unit, would be included in the CRMAPP to be prepared for the Alpine Triangle SRMA, Management Unit 1.
- page 4-27: In Management Unit 7, the West Antelope Creek ACEC, non-conflicting and compatible livestock management objectives, projects, and mitigating measures would be incorporated into new activity plans, such as AMPs, HMPs or CRMAPPs, before being implemented.
- Page 4-28: For Management Unit 9, the Dillon Pinnacles ACEC, specific management actions would be included in the CRMAPP for unit 7.

APPENDIX Q

- page 4-31: In Management Unit 11, sagebrush treatments and management to improve sage grouse habitat would be incorporated into all activity plans, such as AMPs or CRMAs, and their design, implementation, and management would incorporate as a minimum the sage grouse habitat management guidelines in Appendix A. Deviations from these guidelines may be granted by the authorized officer if it can be demonstrated that short term impacts would be offset by long term benefits to sage grouse and their habitat.
- page 4-34: In Management Unit 13, activity plans developed that involve lands at High Mesa, Hartman Rocks, and Big Mesa would include and consider management objectives for all resources, including recreation management.
- page 4-35: In Management Unit 14, riparian improvement strategies and/or projects would be included in all CRMAs and other activity plans and implemented.

**ACRONYMS,
GLOSSARY,
AND
REFERENCES**

ACRONYMS

ACEC:	Area of Critical Environment Concern	MBF:	Thousand Board Feet
ALMRS:	Automated Lands and Minerals Record System	MFP:	Management Framework Plan
AMP:	Allotment Management Plan	MSA:	Management Situation Analysis
APD:	Application for Permit to Drill	NEPA:	National Environmental Policy Act
ARPA:	Archaeological Resources Protection Act	NPS:	National Park Service
AUM:	Animal Unit Month	NRHP:	National Register of Historic Places
BLM:	Bureau of Land Management	NSO:	No Surface Occupancy
BOM:	Bureau of Mines	NWPS:	National Wilderness Preservation System
BOR:	Bureau of Reclamation	NWASRA:	National Wild and Scenic Rivers Act
CEC:	Colorado Environmental Coalition	ONA:	Outstanding Natural Area
C&MU:	Classification and Multiple Use Act	OHV:	Off-Highway Vehicle
CDOW:	Colorado Division of Wildlife	PLO:	Public Land Order
CEQ:	Council on Environmental Quality	RAMP:	Recreation Area Management Plan
CFR:	Code of Federal Regulations	RAP:	Resource Area Profile
cfs:	cubic feet per second	R&PP:	Recreation and Public Purposes Act
CNAP:	Colorado Natural Areas Program	RCA:	Resource Capability Analysis
CNRA:	Curecanti National Recreation Area	RCL:	Resource Capability Level
CRMP:	Cultural Resources Management Plan	RMP:	Resource Management Plan
CRMAP:	Coordinated Resource Management Activity Plan	RNA:	Research Natural Area
DOE:	Department of Energy	RS:	Revised Statute
EA:	Environmental Assessment	ROD:	Record of Decision
EIS:	Environmental Impact Statement	RPS:	Rangeland Program Summary
EMS:	Existing Management Situation	RVD:	Recreation Visitor Day
EPA:	Environmental Protection Agency	SCS:	Soil Conservation Service
ERMA:	Extensive Recreation Management Area	SRMA:	Special Recreation Management Area
FERC:	Federal Energy Regulatory Commission	T&E:	Threatened and Endangered
FLPMA:	Federal Land Policy and Management Act	TDS:	Total Dissolved Solids
FMP:	Forest Management Plan	TPCC:	Timber Production Capabilities Classification
FMU:	Forest Management Unit	TSP:	Total Suspended Particulates
FR:	Federal Register	USC:	United States Code
GAG:	Geologic Advisory Group	USDA:	U.S. Department of Agriculture
GMU:	Game Management Unit	USDI:	U.S. Department of the Interior
GIS:	Geographic Information System	USFS:	U.S. Forest Service
GRA:	Gunnison Resource Area	USFWS:	U.S. Fish and Wildlife Service
HMP:	Habitat Management Plan	USGS:	U.S. Geological Survey
IBLA:	Interior Board of Land Appeals	VRM:	Visual Resource Management
IGMC:	Interim Grazing Management Criteria	WAPA:	Western Area Power Administration
IMP:	Interim Management Policy (Wilderness)	WSA:	Wilderness Study Area
KGS:	Known Geologic Structure	WSR:	Wild and Scenic River
kv:	kilovolt		

GLOSSARY

ACCELERATED SOIL LOSS. Soil loss that is a direct or indirect result of historic and present human activities. Accelerated soil loss is that which occurs in addition to the soil loss attributable to natural processes acting on undisturbed landscapes.

ACTIVE GRAZING PREFERENCE. That portion of the grazing preference expressed in Animal Units per Month (AUMs), that are available to be licensed for use during any one grazing year.

ACTIVITY PLAN. A site-specific or resource/resource use plan which precedes project implement, construction, or actual development, usually emphasizing a single resource or use on public lands; the most detailed level of BLM planning.

AIR QUALITY CLASSES. Classifications established under the Prevention of Significant Deterioration portion of the Clean Air Act which limits the amount of air pollution considered significant within an area. Class I applies to areas where almost any change in air quality would be significant; Class II applies to areas where the deterioration normally accompanying moderate well-controlled growth would be insignificant; and Class III applies to areas where industrial deterioration would generally be insignificant.

ALLOCATE. To define allowable resource use and related levels of production or use to be maintained.

ALLOTMENT MANAGEMENT PLAN (AMP). A concisely written program of livestock grazing management, including supportive measures if required, designed to attain specific multiple-use management goals in a grazing allotment.

ALLOTMENT CATEGORIZATION. As an aid in prioritizing grazing allotments for grazing management system development, all allotments have been tentatively placed into one of three categories: (1) Maintain or "M"; (2) Improve or "I"; and (3) Custodial or "C". Allotments within each category do not have to meet all the criteria to be managed according to the category objectives. Category criteria are:

AUTHORIZE. To grant permission, usually of a discretionary nature, to engage in an allowable use.

"M" (MAINTAIN) CATEGORY CRITERIA. Present range condition is satisfactory; allotments have moderate or high resource production potential (or trend is moving in that direction); no serious resource-use conflicts/controversy exist; opportunities may exist for positive economic return from public investments; and present management appears satisfactory.

"I" (IMPROVE) CATEGORY CRITERIA. Present range condition is unsatisfactory; allotments have moderate to high resource production potential and are producing at low to moderate levels; serious resource-use conflicts/controversy exist; opportunities exist for positive economic return from public investments; and present management appears unsatisfactory.

"C" (CUSTODIAL) CATEGORY CRITERIA. Present range condition is not a factor; allotment have low resource production potential and are producing near their potential; limited resource-use conflicts/controversy may exist; opportunities for positive economic return on public investments do not exist or are constrained by technological or economic factors; and present management appears satisfactory or is the only logical practice under existing resource conditions.

ALLOTMENT. An area of land where one or more operators graze their livestock. It generally consists of public lands but may include parcels of private or state-owned lands. The number of livestock and period of use are stipulated for each allotment.

ALLOWABLE CUT. The amount of timber which can be harvested on an annual or decadal basis consistent with the principle of sustained yield. The allowable cut includes all planned timber harvest volumes exclusive of such products as Christmas trees, branches, and cones.

ALLUVIAL SOIL. A soil developing from recently deposited alluvium and exhibiting essentially no horizon development or modification of the recently deposited materials.

ALLUVIUM. Clay, silt, sand, gravel, or other rock materials transported by flowing water. Deposited in comparatively recent geologic time as sorted or semisorted sediment in riverbeds, estuaries, floodplains, lakes, and shores, and in fans at the base of mountain slopes.

AMBIENT AIR QUALITY. The state of the atmosphere at ground level as defined by the range of measured and/or predicted ambient concentrations of all significant pollutants for all averaging periods of interest.

ANIMAL UNIT MONTH (AUM). The amount of forage necessary to sustain one cow or its equivalent for a period of one month.

APPLICATION. A written request, petition or offer to lease lands for the purpose of oil and gas exploration and/or the right of extraction.

AQUATIC. Living or growing in or on the water.

AREA OF CRITICAL ENVIRONMENTAL CONCERN (ACEC). An area established through the planning process as provided in FLPMA where special management attention 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; or to fish and wildlife resources or other natural systems or processes; or to protect life and afford safety from natural hazards.

BEST MANAGEMENT PRACTICE. A practice, or a combination of practices, determined by a state or a designated planning agency to be the most effective, practicable means of preventing or reducing the amount of pollution generated by nonpoint sources to a level compatible with water quality goals.

BIG GAME. Larger species of wildlife that are hunted, such as elk, deer, bighorn sheep, and pronghorn antelope. Unless otherwise noted, big game in this RMP/EIS refers to elk and deer.

BLM LAND. Land administered by the Bureau of Land Management.

BLOWOUT. A small area from which wind erosion has removed all or almost all of the soil and soil material.

BOARD FOOT. Measure of amount of timber equivalent to a piece 12" x 12" x 1".

CANDIDATE SPECIES. Any species not yet officially listed but which are undergoing a status review or are proposed for listing according to Federal Register notices published by the Secretary of the Interior or the Secretary of Commerce.

CANOPY. The continuous cover of branches and foliage formed collectively by the crowns of adjacent trees and other woody growth.

CLEAR-CUT. The removal of an entire stand of trees in one cutting. Reproduction is obtained artificially, by natural seeding either from adjacent stands or from trees cut in the clearing operation. This harvest method creates a new even-aged stand of trees.

CLIMAX PLANT COMMUNITY. The final vegetative community that emerges after a series of successive vegetational stages. It represents the highest ecological development of a plant community capable of perpetuation under the prevailing climate and soil conditions.

COAL UNSUITABILITY CRITERIA. Regulations developed by the BLM which use the ability of an area's surface resources to accept or absorb the impact of coal mining activities as a means to determine the suitability or unsuitability of the area for coal mining.

COMMERCIAL FOREST LAND(S). Forest land (of all species of trees) which is producing or is capable of producing 20 cubic feet per acre per year.

CONDITIONAL FIRE SUPPRESSION. Areas where the intensity of fire suppression actions is not fixed and will vary with the conditions existing at the time the fire starts. These areas are managed on a least-cost basis.

CONDITIONS OF APPROVAL. Conditions or provisions (requirements) under which an Application for Permit to Drill or a Sundry Notice is approved.

CONTIGUOUS. Lands or legal subdivisions having a common boundary; lands having only a common corner are not contiguous.

CONTROLLED SURFACE USE (CSU). Use and occupancy is allowed (unless restricted by another stipulation), but identified resource values require special operational constraints that may modify the lease rights. CSU is used for operating guidance, not as a substitute for the NSO or Timing stipulations.

COORDINATED RESOURCE MANAGEMENT ACTIVITY PLAN (CRMAPP). An activity level plan completed for more than one resource in a given area/site, usually when conflicts or potential conflicts could occur between various resource activities.

CRUCIAL WILDLIFE RANGE. Parts of the habitat necessary to sustain a wildlife population at critical periods of its life cycle. This is often a limiting factor on the population, such as breeding habitat, winter habitat, etc.

CULTURAL RESOURCE INVENTORY CLASSES. Types of inventories to determine the existence, significance, and other characteristics of cultural (historical and archeological) resources. Cultural resource inventories are categorized as Class I, II, or III.

CLASS I. An existing data survey. This is an inventory of a study area to (1) provide a narrative overview of cultural resources by using existing information, and (2) compile existing cultural resources site record data on which to base the development of the BLM's site record system.

CLASS II. A sampling field inventory designed to locate, from surface and exposed profile indications, all cultural resource sites within a portion of an area so that an estimate can be made of the cultural resources for the entire area.

CLASS III. An intensive field inventory designed to locate, from surface and exposed profile indications, all cultural resource sites in an area. Upon its completion, no further cultural resources inventory work is normally needed.

CULTURAL RESOURCES. Those fragile and non-renewable remains of human activity, occupation, or endeavor reflected in districts, sites, structures, buildings, objects, artifacts, ruins, works of art, architecture, and natural features that were of importance in human events.

CUMULATIVE IMPACTS. The collective and aggregate impacts of all actions affecting a particular resource.

DIRECTIONAL DRILLING. Drilling borehole wherein course of hole is planned before drilling. Such holes are usually drilled with rotary equipment at an angle to the vertical and are useful in avoiding obstacles or in reaching side areas or mineral estate beneath restricted surface.

DISPOSAL. Transfer of ownership of a tract of public land from the United States to another party through sale, exchange, transfer under the Recreation and Public Purposes Act, or desert land entry.

DIVERSITY. The relative abundance of wildlife species, plant species, communities, habitats, or habitat features per unit of area.

EASEMENT. Right afforded a person or agency to make limited use of another's real property for access or other purposes.

ECOLOGICAL SITE. A distinctive geographic unit that differs from other kinds of geographic units in its ability to produce a characteristic natural plant community. An ecological site is the product of all the environmental factors responsible for its development. It is capable of supporting a native plant community typified by an association of species that differs from that of other ecologic sites in the kind or portion of species or in total production.

ECOLOGICAL STATUS. The present state of vegetation of a range site in relation to the potential natural community for the site. Ecological status is use independent. It is an expression of the relative degree to which the kinds, proportions, and amounts of plants in a community resemble that of the potential natural community. The four ecological status classes correspond to 0-25, 26-50, 51-75, or 76-100 percent similarity to the potential natural community and are called early seral, mid seral, late seral, and potential natural community, respectively.

ECOSYSTEM. Collectively, all populations in a community, plus the associated environmental factors.

ENDANGERED SPECIES. Any species which is in danger of extinction throughout all or a significant portion of its range.

ENVIRONMENTAL ASSESSMENT (EA). A concise public document prepared to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. It includes a brief discussion of the need for the proposal, alternatives considered, environmental impacts of the proposed action and alternatives, and a list of agencies and individuals consulted.

ENVIRONMENTAL IMPACT STATEMENT (EIS). A formal public document prepared to analyze the impacts on the environment of a proposed project or action and released for comment and review. An EIS must meet the requirements of NEPA, CEQ guidelines, and directives of the agency responsible for the proposed project or action.

EPHEMERAL STREAM. A stream that flows occasionally because of surface runoff, but is not influenced by permanent ground water.

EXCEPTION. Case-by-case exemption from an oil and gas lease stipulation. The stipulation continues to apply to all other sites within a leasehold to which the restrict criteria applies.

EXISTING MANAGEMENT SITUATION, AND RESOURCE CAPABILITY ANALYSIS. This is available for review at BLM's Colorado State Office, Montrose District Office, and Gunnison Resource Area Office.

EYRIE. A cliff nest of a raptor.

FEDERAL LAND POLICY AND MANAGEMENT ACT OF 1976 (FLPMA). Public Law 94-579 signed by the President on October 21, 1976. Establishes public land policy for management of lands administered by the Bureau of Land Management. FLPMA specifies several key directions for the Bureau, notably (1) management be on the basis of multiple-use and sustained yield, (2) land use plans be prepared to guide management actions, (3) public lands be managed for the protection, development, and enhancement of resources, (4) public lands be retained in federal ownership, and (5) public participation be utilized in reaching management decisions.

FISHERY, FISHERY STREAM. A body of water capable of producing and sustaining fishery populations.

FORAGE. All browse and herbaceous forbs that are available to grazing animals.

FORB. A nonwoody herbaceous plant.

FOREST LANDS. Lands which are, or are capable of being, at least 10 percent stocked by forest trees and are not currently developed for nonforest use.

FOREST MANAGEMENT. The application of business methods and technical forestry principles to the operation of a forest property.

FOREST MANAGEMENT UNIT. A specific geographic area for which a FMP would be prepared and in which intensive management of commercial forest land(s) would occur.

FOREST MANAGEMENT PLAN (FMP). A detailed activity plan identifying the objectives and techniques used to harvest the forest resource of a specific area.

FRAGILE SOIL. Category of problem sites composed of soils that have moderate to high water holding capacities, moderate to slow permeability, and can be severely degraded by compaction, slumping and sliding, and erosion.

FRAGILE SOIL/SLOPE GRADIENT. Problem sites where unstable landforms and unstable or erosive soils are made more vulnerable to degradation by steep slopes.

GRAZING SYSTEM. Scheduled grazing use and non-use of an allotment to reach identified goals or objectives by improving the quality and quantity of vegetation.

GROUND COVER. The area of ground surface occupied by the stem(s) of a range plant, as contrasted with the full spread of its herbage or foliage, generally measured at one inch above soil level.

GROUND WATER. Water beneath the land surface, in the zone of saturation.

GROWING SEASON. Generally, the period of the year during which the temperature of vegetation remains sufficiently high to allow plant growth.

HABITAT MANAGEMENT PLAN (HMP). A written and approved activity plan for a geographical area which identifies habitat management activities to be implemented in achieving specific objectives of planning decisions.

HABITAT. A specific set of physical conditions that surround a single species, a group of species, or a large community. In wildlife management, the major components of habitat are considered to be food, water, cover, and living space.

HAZARDOUS MATERIALS. Hazardous materials are any of the materials classified as hazardous waste, as defined in 40 CFR 261.3. The definition in the CFR includes numerous categories of materials that could be harmful to health, safety, or property.

HAZARD SITES/AREAS. Locations, features, or characteristics of locations that require caution because of the nature of these locations or sites. Examples are waterfalls, cliffs, abandoned mines, quarries, or steep highwalls at active or abandoned surface mining operations.

HEAVY GRAZING. A comparative term which indicates that the stocking rate of a pasture is relatively greater than that of other pastures. Often erroneously used to mean overuse. *cf.* light and moderate grazing.

IMPACT. The effect, influence, alteration, or imprint caused by an action.

INDIGENOUS. Born, growing or produced naturally (native) in an area, region, or country.

INFILTRATION RATE. Maximum rate at which soil under specified conditions can absorb rain or shallow impounded water, expressed in quantity of water absorbed by the soil per unit of time.

INTENSIVE FIRE SUPPRESSION. Areas where a full complement of equipment and work force is used to contain, control, and suppress wildfire.

INTERIM GRAZING MANAGEMENT CRITERIA. A set of conditions applicable to forage utilization and range-readiness that governs how much forage can be consumed by grazing animals on public land and when livestock grazing can help in the spring on public land.

INTERIM MANAGEMENT POLICY (IMP). The Department of Interior policy that mandates the BLM to manage lands under wilderness review so as not to impair wilderness values and to protect the right of Congress to make the wilderness designation decision.

INTERMITTENT STREAM. A stream that does not flow year-round but has some association with ground water for surface or subsurface flow.

INTRUSION. A feature (land and water form, vegetation, or man-made structure) that is generally considered out of context with the characteristic landscape.

INVADER. Plant species that were absent or present in very small amounts in undisturbed portions of the original vegetation of a specific range site and will invade following disturbance or continued overuse.

INVERTEBRATE. An animal lacking a backbone or spinal column.

KEY AREA. A relatively small portion of a rangeland selected because of its location, use, or grazing value as an area on which to monitor the effects of grazing use. It is assumed that key areas, if properly selected, will reflect the effects of current grazing management over all or a part of a pasture, allotment, or other grazing unit.

KEY SPECIES. (1) those species which must, because of their importance, be considered in a management program; or (2) forage species whose use serves as an indicator to the degree of use of associated species.

KNOWN GEOLOGIC STRUCTURES (KGS). A trap in which an accumulation of oil and gas has been discovered by drilling and which is determined to be productive. Its limits include all acreage that is presumptively productive (43 CFR 3100.0-5 (a)).

LAND TREATMENT. All methods of artificial range improvement and soil stabilization such as reseeding, brush control (chemical and mechanical), pitting, furrowing, water spreading, etc.

LEASE NOTICE. Provides more detailed information concerning limitation that already exist in law, lease terms, regulations, or operation orders. A Lease Notice also addresses special items the lessee would consider when planning operations, but does not impose new or additional restrictions.

LEASABLE MINERALS. Those minerals or materials designated as leasable under the Mineral Leasing Act of 1920. They include coal, phosphate, asphalt, sulphur, potassium and sodium minerals, and oil and gas. Geothermal resources are also leasable under the Geothermal Stream Act of 1970.

LITHIC SITE. An archeological site containing debris left from the manufacturer, use, or maintenance of flaked stone tools.

LOCATABLE MINERALS. Minerals or materials subject to claim and development under the Mining Law of 1872, as amended. Generally includes metallic minerals such as gold and silver, and other materials not subject to lease or sale (some bentonites, limestone, talc, some zeolites, etc.). Whether or not a particular mineral deposit is locatable depends on such factors as quality, quantity, mineability, demand, and marketability.

LOCATION. Perfecting the right to a mining claim by discovery of a valuable mineral, monumenting the corners, completing discovery work, posting a notice of location, and recording the claim.

LONG-TERM. In this document, refers to the time period extending beyond the 10 to 12-year life of the plan. Long-term impacts would occur over a 20-year period.

MANAGEMENT FRAMEWORK PLAN (MFP). A land use plan that establishes land use allocations, multiple-use guidelines, and management objectives for a given planning area. The MFP planning system was used by the BLM until about 1980.

MANAGEMENT SITUATION ANALYSIS (MSA). An unpublished companion document to this RMP that provides the background documentation for the development of alternatives. The MSA consists of the Resource Area Profile.

MASS WASTING. Dislodging and downslope transport of earthen material as a unit, such as in landslides, rockslides, and earthflows.

MINERAL ESTATE (MINERAL RIGHTS). The ownership of minerals, including rights necessary for access, exploration, development, mining, ore dressing, and transportation operations.

MINERAL MATERIALS. Common varieties of sand, building stone, gravel, clay, moss rock, etc., obtainable under the Minerals Act of 1947, as amended.

MINERAL ENTRY. Claiming public lands (administered by the BLM) under the Mining Law of 1872 for the purpose of exploiting minerals. May also refer to mineral exploration and development under the mineral leasing laws and the Material Sale Act of 1947.

MINING LAW OF 1872. Provides for claiming and gaining title to locatable minerals on public lands. Also referred to as the "General Mining Laws" or "Mining Laws."

MITIGATION. Alleviation or lessening of possible adverse effects on a resource by applying appropriate protective measures or adequate scientific study.

MODIFICATION. Fundamental change to the provisions of a lease stipulation, either temporarily or for the term of the lease. A modification may, therefore, include an exemption from or alteration to a stipulated requirement. Depending on the specific modification, the stipulation may or may not apply to all other sites within the leasehold to which the restrictive criteria applied.

MONITORING. The orderly collection, analysis, and interpretation of resource data to evaluate progress toward meeting management objectives.

MONOCLINE. A geologic structure in which the strata are all inclined in the same direction at a uniform angle of dip.

MULTIPLE-USE. Management of the various surface and subsurface resources so that they are jointly utilized in the manner that will best meet the present and future needs of the public, without permanent impairment of the productivity of the land or the quality of the environment.

NATIONAL REGISTER OF HISTORIC PLACES (NRIIP). A listing of architectural, historical, archeological, and cultural sites of local, state, or national significance, established by the Historic Preservation Act of 1966 and maintained by the National Park Service.

NATIONAL ENVIRONMENTAL POLICY ACT OF 1969 (NEPA). Public Law 91-190. Established environmental policy for the nation. Among other items, NEPA requires federal agencies to consider environmental values in decision-making processes.

NATURALNESS. Refers to an area that "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable" (sec. 2(c) of the Wilderness Act of 1964).

NO SURFACE OCCUPANCY (NSO). A fluid mineral leasing stipulation that prohibits occupancy or disturbance on all or part of the lease surface in order to protect special values or uses. Lessees may exploit the oil and gas or geothermal resources under leases restricted by this stipulation through use of directional drilling from sites outside the no surface occupancy area.

NO SURFACE DISTURBANCE. Defined on a case-by-case basis when the activity plan for an area is developed. In general, an activity would be allowed so long as it does not interfere with the management objectives of the area.

NON-FOREST LANDS. Areas within the forest lands that are incapable of maintaining at least 10 percent stocking of forest trees (native woody plants that regularly attain a height of 20 feet or more), and those lands which have been converted to non-timber uses. Examples are rock outcrops, roads, and urban areas. These lands are excluded from the timber production base.

NONGAME SPECIES. Those species not commonly harvested either for sport or profit.

OFF-HIGHWAY VEHICLE (OHV). This term replaces "off-road vehicle (ORV)", and means any motorized vehicle capable of or designed for travel on or immediately over land, water, or other natural terrain.

OFF-HIGHWAY USE DESIGNATIONS (OPEN, LIMITED, AND CLOSED).

OPEN. Designated areas, routes, roads, and trails where unrestricted OHV use may occur (subject to operating regulations and vehicle standards set forth in BLM Manuals 8341 and 8343).

LIMITED. Designated areas, routes, roads, and trails where the use of off-highway vehicles is subject to restrictions, such as limiting the number or types of vehicles allowed, dates and times of use (seasonal restrictions), limiting use to existing routes, roads, and trails, or limiting use to designated routes, roads, and trails. Under the "limited to designated routes, roads, and trails" designation, use would be allowed only on routes, roads, and trails that are signed for such use. Combinations of restrictions, such as limiting use to certain types of vehicles during certain times of the year, are possible.

CLOSED. Designated areas, routes, roads, and trails where the use of off-highway vehicles is permanently or temporarily prohibited. Emergency use of vehicles is allowed.

OUTSTANDING NATURAL AREA (ONA). An area established to preserve scenic values and natural wonders. The preservation of these resources in their natural condition is the primary management objective.

OVERSTORY. That portion of a plant community consisting of the taller plants on the site; the forest or woodland canopy.

PATENT. A grant made to an individual or group conveying fee simple title to selected public lands.

PATENTED CLAIM. A claim on which title has passed from the federal government to the mining claimant under the Mining Law of 1872.

PERENNIAL STREAM. A stream that has year-round surface flows.

PERIOD OF USE. The time period that a pasture or other area in a grazing allotment is actually used for livestock grazing, as compared with the period when use is anticipated or planned. The period of use could be less or more time than anticipated use, or could occur at different times.

PERMEABILITY. The condition of being porous; containing openings or interstices through which outside properties can pass.

PLANNING AREA. The geographical area for which land use and resource management plans are developed and maintained.

POTENTIAL NATURAL COMMUNITY (PNC). The biotic community that would become established if all successional sequences were completed without interferences by man under the present environmental conditions. Natural disturbances are inherent in development. Includes naturalized non-native species.

PRESCRIBED FIRE (PRESCRIBED BURNING). Application of fire to natural fuels under specific conditions of weather, fuel moisture, soil moisture, smoke, and other conditions intended to produce the intensity of heat and rate of spread required to accomplish certain objectives of wildlife habitat or livestock grazing management, and/or hazard reduction.

PRIMITIVE AND UNCONFINED RECREATION. Non-motorized and undeveloped types of outdoor recreation.

PUBLIC LAND. Any land and interest in land (outside of Alaska) owned by the United States and administered by the Secretary of the Interior through the Bureau of Land Management (BLM).

RANGE CONDITION. See ecological status.

RANGE SITE. A kind of rangeland with a specific potential natural community and specific physical site characteristics, differing from other kinds of rangeland in its ability to produce vegetation and to respond to management. Range sites are defined and described with soil, species composition, and production emphasis. Range site is synonymous with ecological site.

RANGELAND. A kind of land which supports vegetation useful for grazing on which routine management of that vegetation is through manipulation of grazing rather than cultural practices. (Rangeland include natural grasslands, savannas, shrublands, most deserts, tundra, alpine communities, coastal marshes, riparian zones, and wet meadows. Rangeland includes lands revegetated naturally or artificially to provide a plant cover which is managed like native vegetation.)

RAPTORS. Bird of prey with sharp talons and strongly curved beaks, e.g., hawks, owls, vultures, eagles.

RECLAMATION. Returning disturbed lands to a form and productivity that will be ecologically balanced and in conformity with a predetermined land management plan.

RECREATION AREA MANAGEMENT PLAN (RAMP). An activity plan detailing specific recreation facilities, resource, and management actions to be implemented in a Special Recreation Management Area.

RECREATION VISITOR DAY (RVD). Aggregation of 12 visitor hours, where a visitor hour is the presence of one or more persons on lands and water for outdoor recreation purposes for continuous, intermittent, or simultaneous periods aggregating 60 minutes (one person for one hour).

RECREATION OPPORTUNITY SPECTRUM (ROS). A method for classifying the land by setting opportunity, according to the ability of the land to provide various types of physical, social, and managerial settings to satisfy the desires and expected behavioral preferences of the users.

RECREATION AND PUBLIC PURPOSES ACT (R&PP). This Act authorizes the Secretary of the Interior to lease or convey public lands for recreational and public purposes under specified conditions to states or their political subdivisions, and to nonprofit corporations and associations.

RECREATION PROJECT PLANNING. The most detailed level of recreation planning that includes, among other information, all required construction plans for an entire campground, picnic area or other sites, an individual recreation facility, or other recreation related projects, such as signing or parking lots. A recreation project plan could be developed for construction within an existing site or a proposed site. A narrative would accompany these plans.

RESOURCE MANAGEMENT PLAN (RMP). A land use plan that establishes land use allocations, multiple-use guidelines, and management objectives for a given planning area. The RMP planning system has been used by the BLM since about 1980.

RESOURCE AREA. A geographic portion of a BLM District that is the smallest administrative subdivision in the BLM.

RESOURCE VALUE RATING (RVR). The value of vegetation present on a range site for a particular use or benefit. Resource value ratings may be established for each plant community capable of being produced on a range site, including exotic or cultivated species. On a given range site, each use (or potential use) has a separate resource value rating because that rating is based on classification of plants according to their value for a specific use. Some examples: A resource value rating for forage useful for cows and calves during the spring grazing season could be based on proper use factors (PUF's) or a more general assigning of plant species to good, moderate, or poor categories of forage value. Resource value ratings could then be based on production, cover, density, or frequency of plants in the different categories. A resource value rating for cover useful for a pronghorn fawning area might be based on density or cover of plants of a certain height or size class, without regard to plant species. A resource value rating related to scenic beauty might be based on such factors as abundance of flowering species, species with fall color, evergreens, or diversity of growth forms.

REST-ROTATION. A prescribed pattern of grazing use that provides sequential rest for various parts of the range unit for at least an entire year.

RIGHTS-OF-WAY CORRIDOR. A designated parcel of land, either linear or areal in character, that has been identified through the land use planning process as the preferred location for existing and future rights-of-way grants and would accommodate more than one type of right-of-way or one or more rights-of-way that are similar, identical, or compatible.

RIPARIAN ZONE. Riparian zones are a form of wetland transition between permanently saturated wetlands and upland areas. These areas exhibit vegetation or physical characteristics reflective of permanent surface or subsurface water influence. Lands along, adjacent to, or contiguous with perennially and intermittently flowing rivers and streams, glacial potholes, and the shores of lakes and reservoirs with stable water levels are typical riparian areas. Excluded are such sites as ephemeral streams or washes that do not exhibit the presence of vegetation dependent upon free water in the soil.

RIPARIAN RESOURCE VALUE RATING. A riparian resource value rating evaluates progress toward meeting site-specific management objectives. A rating system is based on site potential and management objectives for the riparian ecological site. Rating criteria will differ for a given site where management objectives differ.

ROADLESS. Refers to the absence of roads that have been constructed and maintained by mechanical means to ensure regular and continuous use.

ROADS. Vehicle routes which have been improved and maintained by mechanical means to ensure relatively regular and continuous use. (A way maintained strictly by the passage of vehicles does not constitute a road.)

SALEABLE MINERALS. Minerals, such as common varieties of sand, stone, gravel, cinders, pumice, pumicite, and clay that may be acquired under the *Materials Act* of 1947, as amended.

SALINITY. Refers to the solids such as sodium chloride (table salt) and alkali metals that are dissolved in water.

SCOPING PROCESS. An early and open public participation process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.

SEDIMENT YIELD. The amount of sediment produced in a watershed, expressed as tons, acre-feet, or cubic yards of sediment per unit of drainage area per year.

SENSITIVE SPECIES. A species included on the sensitive species list developed by the Colorado State Office pursuant to section CL of Instruction Memorandum No. 80-722 and approved by the State Director.

SERAL STAGE. The present state of vegetation of an ecological site in relation to the potential natural community for the site. Vegetation status is the expression of the relative degree to which the kinds, proportions, and amounts of degree to which the kinds, proportions, and amounts of plants in a community resemble those of the potential natural community. The classes are potential natural community, late seral, mid-seral, and early seral.

SERAL COMMUNITY. One of a series of biotic communities that follow one another, in time on any given area. Seral community is synonymous with seral stage, successional community, and successional stage.

SHEET EROSION. The removal of a fairly uniform layer of soil from the land surface by runoff water.

SHORT-TERM. In this document, short-term refers to the 10 to 12-year life of the approved RMP. Short-term impacts would occur within that time period.

SOIL HORIZON. A layer of soil approximately parallel to the soil surface with comparatively uniform characteristics.

SOIL ASSOCIATION. A mapping unit used on general soil maps in which two or more defined taxonomic units occurring together in a characteristic pattern are combined.

SOLITUDE. The state of being alone or remote from habitations; isolation. A lonely or secluded place. Factors contributing to opportunities for solitude may include size, natural screening, topographic relief, vistas, physiographic variety, and the ability of the user to find a secluded spot.

SPECIAL STIPULATIONS. Additional specific terms and conditions that change the manner in which operations may be conducted on a lease or modify the lease rights granted. This term may also apply to other land use authorizations, i.e., rights-of-way grants.

SPECIAL RECREATION MANAGEMENT AREA (SRMA). An area that possesses outstanding recreation resources or where recreation use causes significant user conflicts, visitor safety problems, or resource damage.

SPLIT ESTATE. Lands where the surface and mineral estates have been severed and are under different ownership (i.e., private surface/Federal minerals).

STREAMBANK (AND CHANNEL) EROSION. The removal, transport, deposition, recutting, and bed load movement of material in streams by concentrated water flows.

SUITABILITY. As used in the Wilderness Act and in the Federal Land Policy and Management Act refers to a recommendation by the Secretary of Interior or the Secretary of Agriculture that certain federal lands satisfy the definition of wilderness in the Wilderness Act and have been found appropriate for designation as wilderness on the basis of an analysis of the existing and potential uses of the land.

SUITABLE COMMERCIAL FOREST LANDS. Lands determined to have the capability of sustaining long-term timber production.

SUPPLEMENTAL VALUES. Resources associated with wilderness which contribute to the quality of wilderness areas.

SUSTAINED YIELD. The achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the public lands consistent with multiple-use.

TERRESTRIAL. Living or growing in or on the land.

THREATENED SPECIES. Any species or significant population of that species likely to become endangered within the foreseeable future throughout all or a significant portion of its range. Usually includes only those species that have been recognized and listed as threatened by federal and state governments, but may include species categorized as rare, very rare, or depleted.

TIMBER PRODUCTION CAPABILITY CLASSIFICATION (TPCC). A classification system based on a forest inventory designed to rate an area's suitability for production of timber or woodland products.

TIMBER. Standing trees, downed trees, or logs which are capable of being measured in board feet.

TIMING LIMITATION (SEASONAL RESTRICTION). Prohibits surface use during specified time periods to protect identified resource values. The stipulation does not apply to the operation and maintenance of production facilities unless the findings of analysis demonstrate the continued need for such mitigation and that less stringent, project-specific mitigation measures would be insufficient.

TOTAL DISSOLVED SOLIDS (TDS). Salt, or an aggregate of carbonates, bicarbonates, chlorides, sulfates, phosphates, and nitrates of calcium, magnesium, manganese, sodium, potassium, and other cations that form salts.

TREND. The direction of change in ecological status or in resource value ratings observed over time. Trend in ecological status is described as "toward" or "away from" the potential natural community or as "not apparent." Appropriate terms are used to describe trend in resource value ratings. Trends in resource value ratings for several uses on the same site at a given time may be in different directions, and there is no necessary correlation between trends in resource value ratings and trend in ecological status.

TRESPASS. Any unauthorized use of public land.

UNDERSTORY. That portion of a plant community growing underneath the taller plants on the site.

UNIQUE PLANT ASSOCIATIONS. Plant communities which (1) occur only in Colorado, (2) are common elsewhere but are represented by only a few occurrences in Colorado, (3) could easily be eliminated from Colorado, or (4) are considered to be their natural state.

UNIVERSAL SOIL LOSS EQUATION. A formula for predicting soil loss resulting from sheet and rill erosion caused by rainfall.

UTILIZATION. The proportion or degree of current year's forage production that is consumed or destroyed by animals (including insects). May refer either to a single plant species, a group of species, or to the vegetation as a whole. Utilization is synonymous with use.

VALID EXISTING RIGHTS. Legal interests that attach to a land or mineral estate that cannot be divested from the estate until that interest expires or is relinquished.

VANDALISM. Willful or malicious destruction or defacement of public property; e.g., cultural or paleontological resources.

VEGETATION MANIPULATION. Planned alteration of vegetation communities through use of prescribed fire, plowing, herbicide spraying, or other means to gain desired changes in forage availability, wildlife cover, etc.

VEGETATION TYPE. A plant community with immediately distinguishable characteristics based upon and named after the apparent dominant plant species.

VERTEBRATE. An animal having a backbone or spinal column.

VISUAL RESOURCE MANAGEMENT CLASSES. VRM classes identify the degree of acceptable visual change within a characteristic landscape. A VRM classification is assigned to public lands based on the guidelines established for scenic quality, visual sensitivity, and visibility. The management objectives for visual resources in each VRM Class are:

VRM CLASS I. This classification preserves the existing characteristic landscape and allows for natural ecological changes only. Includes Congressionally authorized areas (wilderness) and areas approved through the RMP where changes to the landscape would be restricted, would be very low, and would not attract attention.

VRM CLASS II. This classification retains the existing characteristic landscape. The level of change in any of the basic landscape elements due to management activities should be low and not evident.

VRM CLASS III. This classification partially retains the existing characteristic landscape. The level of change in any of the basic landscape elements due to management activities may be moderate and evident.

VRM CLASS IV. This classification provides for major modifications of the characteristic landscape. The level of change in the basic landscape elements due to management activities can be high. Such activities may dominate the landscape and be the major focus of viewer attention.

VRM CLASS V. This classification applies to areas where the characteristic landscape has been so disturbed that rehabilitation is needed to improve scenic quality. Generally considered an interim short-term classification until rehabilitation or enhancement is completed, note from SLRA p., F-1.

VRM CLASS II R, III R, AND IV R. These classifications denote lands that contain visual intrusions to the extent that rehabilitation is necessary to improve the scenic quality to the level where applicable class objectives (II, III, or IV) could be applied. Upon rehabilitation, the lands would be managed as per the noted VRM Class (II, III, or IV).

VISUAL RESOURCE MANAGEMENT (VRM). The inventory and planning actions taken to identify visual resource values and to establish objectives for managing those values, and the management actions taken to achieve the visual resource management objectives.

VISUAL SENSITIVITY. Visual sensitivity levels are a measure of public concern for scenic quality and existing or proposed visual change to the landscape.

VISUAL RESOURCES. The visible physical features within and on a landscape, (topography, water, vegetation, animals, structures, and other features) that comprise the scenery of the area.

VOLUNTARY NON-USE/SUSPENDED. That portion of the total grazing preference, expressed in AUMs that is being temporarily withheld from active grazing use.

WAIVER. Permanent exemption from a lease stipulation. The stipulation no longer applies anywhere within the leasehold.

WATERSHED. Topographical region or area delineated by water draining to a particular water course or body of water.

WAY. A vehicle route established and maintained solely by the passage of motor vehicles. A way is not a road.

WETLANDS. Those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and which, under normal circumstances, do support a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands include marshes, swamps, lake bogs, muskegs, wet meadows, estuaries, and riparian areas.

WILDERNESS MANAGEMENT POLICY. Policy document prescribing the general objectives, policies, and specific activity guidance applicable to all designated BLM wilderness areas. Specific management objectives, requirements, and decisions implementing administrative practices and visitor activities in individual wilderness areas are developed and described in the wilderness management plan for each unit.

WILDERNESS INVENTORY. An evaluation of the public land in the form of a written description and a map showing those lands that meet the wilderness criteria as established under Section 603 (a) of FLPMA and Section 2 (c) of the Wilderness Act. The lands meeting the criteria will be referred to as WSAs.

WILDERNESS AREA. An area formally designated by Congress as a part of the National Wilderness Preservation System.

WILDERNESS STUDY AREA (WSA). An area determined to have wilderness characteristics. Wilderness study areas will be subject to interdisciplinary analysis and public comment to determine wilderness suitability. Suitable areas will be recommended to the President and Congress for designation as wilderness.

WILDERNESS CHARACTERISTICS. Identified by Congress in the Wilderness Act of 1964; namely, size, naturalness, outstanding opportunities for solitude or a primitive and unconfined type of recreation, and supplemental values such as geological, archaeological, historical, ecological, scenic, or other features.

WITHDRAWAL. An action which restricts the use of public land and segregates the land from the operation of some or all of the public land and mineral laws. Withdrawals are also used to transfer jurisdiction of management of public lands to other federal agencies.

WOODLANDS. Plant communities in which trees, often small and characteristically short-bowled relative to their depths of crown, are present but form only an open canopy, the intervening areas being occupied by lower vegetation, commonly grass. Woodland forests contain major and minor forest products (or any wood fibre) that has, or may have, merchantability.

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