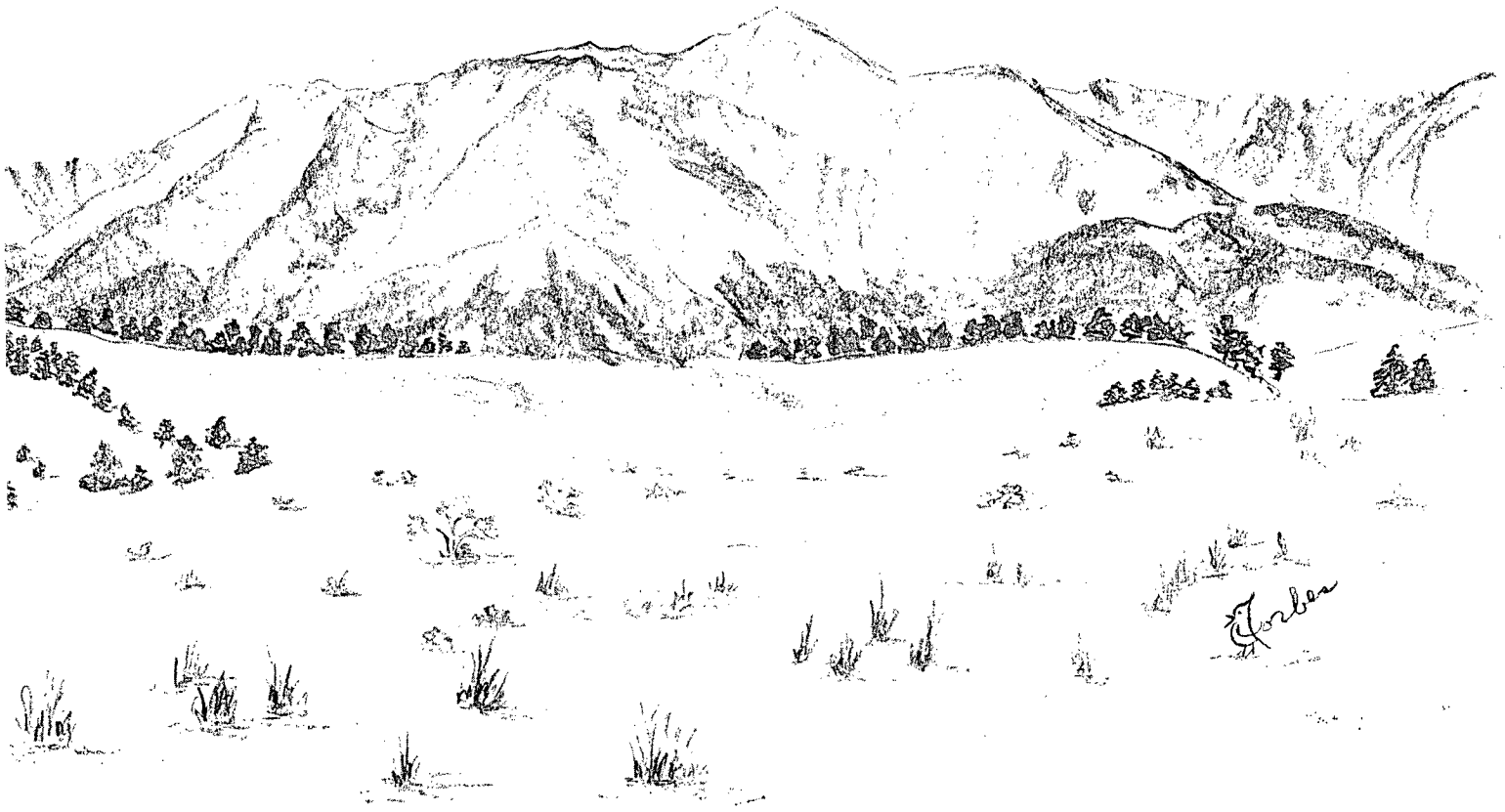
United States Department of the Interior
Bureau of Land Management
Cañon City District
Colorado

FES 91-22

September 1991

SAN LUIS RESOURCE AREA

Proposed Resource Management Plan and Final Environmental Impact Statement



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
CANON CITY DISTRICT OFFICE
P.O. BOX 2200
CANON CITY, COLORADO 81215-2200

TAKE PRIDE IN AMERICA

September 1991

Dear Reader:

Enclosed for your review is the San Luis Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS). The proposed resource management plan, referred to as the proposed plan, is a refinement of the Preferred Alternative in the Draft San Luis Resource Management Plan/Environmental Impact Statement. Public comments were analyzed and corrections and clarification of wording have been incorporated into this document. The proposed RMP and final EIS are published in an abbreviated format and are designed to be used in conjunction with the draft RMP/EIS, which was released in September 1989.

This plan is the proposed action of the Bureau of Land Management. With the exception of the wilderness study area recommendations, all parts of this proposed plan may be protested in accordance with the planning regulations, 43 CFR 1610.5-2. See Chapter 1 for more detailed information.

We wish to thank all those individuals, groups, and agencies who were involved in our eleven user input groups, who attended our public meetings, briefings, open houses, etc. and who took time to provide either oral or written comments on the draft RMP/EIS during the last several years. Certainly, without this meaningful input, the proposed plan and final environmental statement would not be as sound as we believe it is now.

Sincerely,

for Donnie R. Sparks
District Manager

SAN LUIS

PROPOSED RESOURCE MANAGEMENT PLAN

FINAL ENVIRONMENTAL IMPACT STATEMENT

SEPTEMBER 1991

FES 91-22

Prepared by:

United States Department of the Interior

Bureau of Land Management

Colorado State Office

Cañon City District Office

San Luis Resource Area Office

for **Donnie R. Sparks**
District Manager
Cañon City District

Bob Moore

Bob Moore
State Director
Colorado State Office

PROPOSED RESOURCE MANAGEMENT PLAN

and

FINAL ENVIRONMENTAL IMPACT STATEMENT

for the

SAN LUIS PLANNING AREA

Alamosa, Conejos, Costilla, Rio Grande, and Saguache Counties, Colorado

Draft ( ) Final (X)

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

1. Type of Action: Administrative (X) Legislative ( )

2. Abstract: This is the proposed resource management plan and final environmental impact statement for the San Luis Planning Area of the San Luis Resource Area.

This document responds to public comments on the Draft San Luis Resource Management Plan and Environmental Impact Statement. It incorporates all changes made to the draft RMP/EIS, and based on public comments and internal BLM review, refines and modifies the draft RMP/EIS Preferred Alternative. The modified Preferred Alternative is the Bureau of Land Management proposed resource management plan.

This document incorporates by reference the draft RMP/EIS, which was released in September 1989; the draft RMP/EIS must be used in conjunction with the proposed RMP and final EIS.

3. For further information on this proposed plan and final environmental impact statement, contact Joe Kraayenbrink, Area Manager, Bureau of Land Management, San Luis Resource Area, 1921 State Street, Alamosa, Colorado 81101; telephone 719-589-4975.

4. Protests to this proposed plan must be addressed to the Director, BLM, in the Washington Office and postmarked within 30 days of the date of publication of the Notice of Availability by the U.S. Environmental Protection Agency in the Federal Register.

SUMMARY

SUMMARY

The San Luis Proposed Resource Management Plan identifies the future management of BLM-administered lands and subsurface minerals within the San Luis Resource Area in south-central Colorado. The proposed plan is a modified version of the Preferred Alternative presented in the Draft San Luis Resource Management Plan and Environmental Impact Statement (RMP/EIS), published in September 1989. A summary of the proposed plan by affected resource or resource use follows.

Fluids Minerals Management

Approximately 259,000 acres (41 percent) of the planning area are open to leasing with standard terms and conditions. (See Mineral Decisions Map in the back of this document.)

Approximately 342,000 acres (55 percent) of the planning area are open to leasing with various limitations; e.g., seasonal restrictions.

Approximately 17,000 acres (3 percent) of the planning area are open to leasing with a no surface occupancy stipulation.

Approximately 3,600 acres (1 percent) of the planning area are closed to leasing.

Locatable Minerals Management

Approximately 601,000 acres (97 percent) of the planning area are open to mineral entry and development.

Approximately 17,000 acres (3 percent) of the planning area are withdrawn from mineral entry and development. (See Mineral Decisions Map in the back of this document.)

Mineral Materials Management

Approximately 599,000 acres (97 percent) of the planning area are open for disposal of mineral materials.

Approximately 22,000 acres (3 percent) of the planning area are closed to disposal of materials. (See Mineral Decisions Map in the back of this document.)

Paleontological Resources

A continual effort to provide intensive inventory and protection, interpretation, and management of these resources will be accomplished within the planning area. A public educational fossil interpretative site (a large area near Clayton Cone) will be provided within the planning area.

Riparian Resources Management

Good to excellent condition will be maintained on approximately 1,400 acres of riparian vegetation within the planning area. Fair or poor condition will be improved on approximately 400 acres of riparian vegetation, and an approximate 15 acres of poor condition riparian vegetation will remain the same. Approximately 1,400 acres of historic wetlands will be redeveloped, and about 1,400 additional acres of potential riparian vegetation will be inventoried.

Livestock Grazing Management

About 32,400 AUMs will be available for domestic livestock grazing on BLM-administered lands within the planning area. Of the estimated potential increase of 11,500 AUMs within the planning area during the next 20 years, about 4,600 AUMs or 40 percent will be made available to livestock. The remainder will be for support of the ecological base and wildlife, if needed.

Wildlife and Fish Habitat Management

Waterfowl and shore bird populations on lands administered by BLM will increase significantly during the next 20 years. About 48,000 AUMs will be available to support the wildlife on BLM-administered lands. Of the estimated potential increase of 11,500 AUMs within the planning area during the next 20 years, about 6,900 AUMs or 60 percent will be made available to wildlife and support of the ecological base, if needed; the remainder will be available to livestock. Stress on big game will be reduced on approximately 342,000 acres of crucial winter habitat. About 73.5 miles and 180 acres of warm and cold water fisheries habitat will be available.

Forest and Woodland Management

Approximately 5,800 acres or 98 percent of the commercial operable forest will be available for harvest. Annually, 34 acres of forest, or 185 Mbf, will be replaced through regeneration harvest. Approximately 12,000 acres or 96 percent of the productive operable woodlands will be available for harvest. Annually, this will be about 53 acres of harvested area or 477 cords. In addition, the age class/growth condition and access of forest and woodlands on lands administered by BLM will improve.

Lands Ownership Adjustment Management

Emphasis will be to retain and manage the majority of BLM-administered lands in the SLRA. Approximately 5,300 acres could be available for disposal by public sale and other means. An additional 352,000 may be available for disposal, preferably by exchange, when disposal is in the public interest. Adjustments to lands administered by BLM under the second category will probably be infrequent. Land disposal will not occur in the designated ACECs, WSAs, and SRMAs within the SLRA. Category I and II criteria are shown in chapter 3 and on the Realty Action Decisions Map in the back of this document.

Some potential zones of acquisition have been tentatively identified to consolidate land ownership patterns, improve manageability, protect or enhance sensitive resources or other public land values, etc. These zones, shown on the Realty Action Decisions Map in the back of this document, are non-Federal lands identified for acquisition only from willing landowners or agencies at fair market value to satisfy important public interests

Lands Withdrawal Management

Existing withdrawals will be retained except for the water-power/storage withdrawals in the 2,640 acres on the 22-mile Rio Grande River Corridor determined suitable for wild and scenic river designation. A new withdrawal will be recommended to protect the river corridor values, whether or not designation as a wild and scenic river occurs. The existing withdrawal for the Blanca area will be expanded to include all 9,147 acres within this special wildlife and recreation area. New withdrawals will be recommended for six eligible national register historic place (NRHP) sites, and retention of the existing withdrawal on Cumbres Toltec Scenic Railroad site will also recommended.

Lands Access Acquisition

All access acquisitions would be directed by the access priority ranking criteria; access benefiting BLM and other resource agencies, access needs identified within various CRMAPs, access needs identified for the Rio Grande River Corridor, and access needs identified within the area-wide support services management plan (SSMP).

Lands Rights-of-Way Management

All utility corridors will be designated per the Western Utilities Group (WUG) plan, except areas of critical environmental concern (ACECs) and exclusion areas. All other BLM-administered lands will be open for consideration for development of major utility facilities with stipulations on a case-by-case basis. (See Realty Action Decisions Map in the back of this document.)

Areas of Critical Environmental Concern

Approximately 142,000 acres were identified for special management. Designation of 131,000 acres (93 percent) for special management will occur. These acres include Sand Castle Area ACEC; San Luis Hills Area ACEC; Blanca Area ACEC; Trickle Mountain Area ACEC; Rio Grande River Corridor ACEC (which includes all portions determined eligible and suitable as an addition to the National Wild and Scenic River System); Elephant Rocks Area ACEC; Cumbres and Toltec Scenic Railroad ACEC; Los Mogotes Area ACEC; and Ra Jadero Canyon ACEC. Areas of Special Concern Decisions Maps are in the back of this document. About 11,200 acres (7 percent) will not be designated as areas for special management.

Recreation Management

About 27,600 acres (5 percent) of the lands administered by BLM in the planning area will be managed for intensive recreation; i.e., the Rio Grande River Corridor (4,595 acres), Penitente Canyon (7,529 acres), Zapata Falls Area (6,302 acres), and Blanca (9,147 acres) special recreation management areas. About 493,000 acres or 95 percent will be managed for extensive recreation opportunities.

About 173,000 acres or 33 percent of lands administered by BLM in the planning area will be managed as open to off-highway vehicle (OHV) use, and about 342,000 acres or 66 percent will be open with limitations to OHV use. There will be 5,300 acres or 1 percent closed to OHV use (shown on Special Concern Maps in the back of this document).

Wild and Scenic Rivers

There are 2,640 acres on 22 miles of the Rio Grande River Corridor identified as suitable for designation as an addition to the National Wild and Scenic River System. The river corridor contains significant values that deserve some enduring form of protection. This protection could be through wild and scenic river designation, national conservation area designation, or some other appropriate means. All 2,830 acres of land administered by BLM determined eligible for designation have been placed under interim management to protect those free-flowing and outstandingly remarkable values within the corridor. Interim management will be in effect until Congressional action occurs or until November 17, 1995, whichever occurs first. If congressional action does not occur, these lands will be managed as directed within this land use plan.

Visual Resource Management

Approximately 19,000 acres of Visual Resource Management (VRM) Class II lands will become class III lands during the life of the plan. About 22,500 acres of class III lands will be managed under class II guidelines. The remainder of the area in class II, III, and IV will be managed to maintain those visual characteristics.

Historical Resources and Archaeological Resources

Significant cultural values on 19 sites will be protected under Section 106 of the National Historic Preservation Act of 1966. Sites eligible for National Register of Historic Places (NRHP) status will be nominated. Public awareness of these sites will be enhanced. Five cultural resource management plans (CRMPs) will be completed for active site interpretation and protection. These significant sites will be retained under BLM administration.

Special Status Plant and Animal Values

Management actions will be considered in activity plans to enhance, recover, or re-establish these special plant and animal resources. These resources will be specifically addressed in eight CRMAPs. Clearances will be conducted for all proposed surface-disturbing actions.

Waterpower/Storage

Management actions to maintain the physical potential for the development of waterpower/storage sites on BLM-administered lands within the planning area will continue. One exception to this will be the recommendation to terminate the withdrawals for the Rio Grande River Corridor. An evaluation of all potential sites will be accomplished, and recommendations for new withdrawals be proposed as needed.

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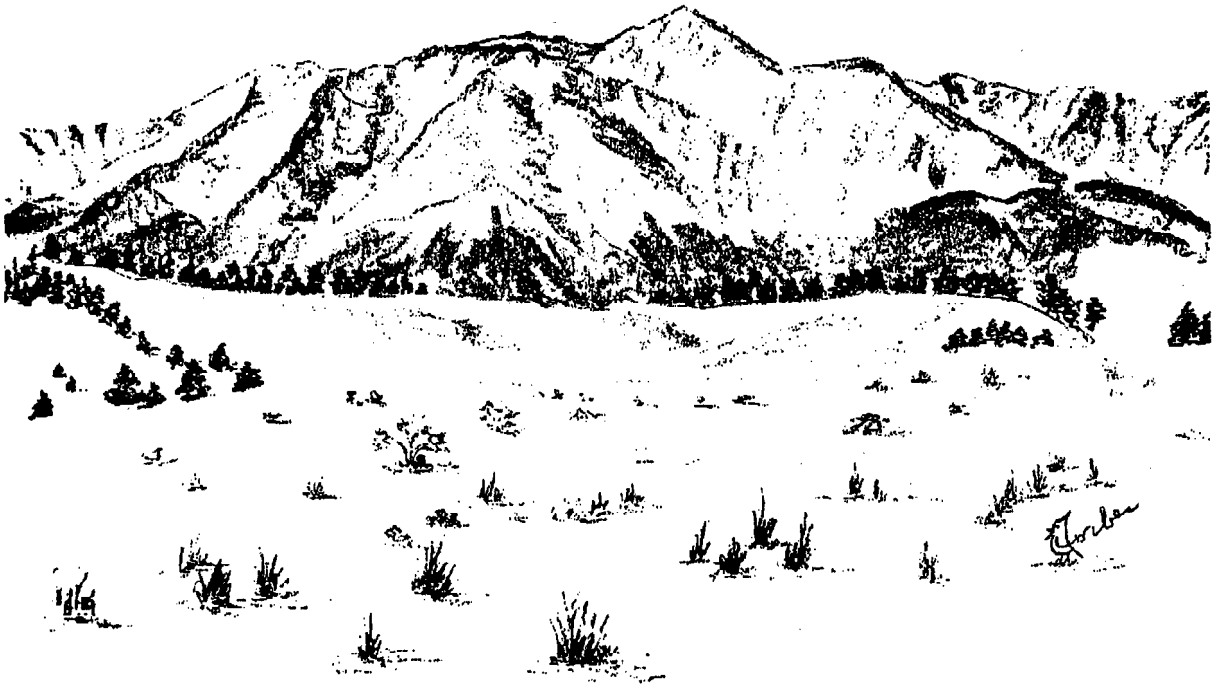

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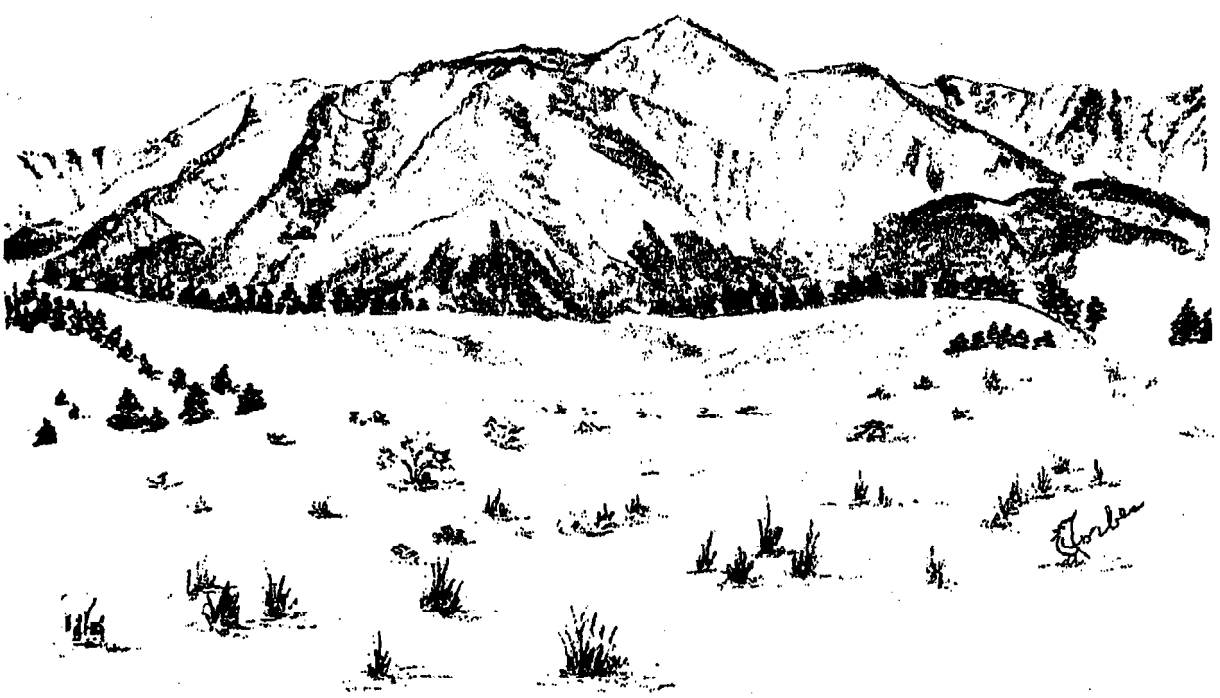
CHAPTER 1
INTRODUCTION



CHAPTER 1
INTRODUCTION

This San Luis Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS) has been prepared in accordance with planning regulations issued under the authority of the *Federal Land Policy and Management Act* of 1976 (FLPMA). Included in this document are the public comments on the Draft San Luis RMP/EIS of September 1989, the Bureau of Land Management (BLM) responses to the public comments, the changes and corrections to the draft RMP/EIS, and the proposed resource management plan.

The proposed RMP identifies the future management of the lands administered by the BLM in the San Luis Planning Area in south-central Colorado. The BLM has administrative responsibility for the land and resource management on 520,677 surface acres and 621,000 acres of subsurface mineral estate within the planning area. (See Mineral Decisions, Realty Action Decisions, and Areas of Special Concern Decisions Maps in the back of this document.)

The RMP will meet the BLM statutory requirement for a master land use plan as mandated by Section 202 of the *Federal Land Policy and Management Act* (FLPMA) and the requirements of the *Wild and Scenic River Act* (16 U.S.C. 1271). The approved RMP will replace all land use planning in the Saguache and San Luis Management Framework Plans (MFPs) of 1973 and 1975 respectively.

PLANNING AREA LOCATION

The San Luis Resource Area (SLRA) of the Cañon City District encompasses 520,677 acres of BLM surface estate land in the San Luis Valley, which is in the south-central part of Colorado (see Maps 1-1 and 1-2). The valley is approximately 122 miles long and about 74 miles wide extending from the Continental Divide on the northwest to the New Mexico State line on the south. Also, about 102,000 acres of subsurface mineral estate are managed by BLM in the resource area for a total of approximately 621,000 acres (Map 1-3).

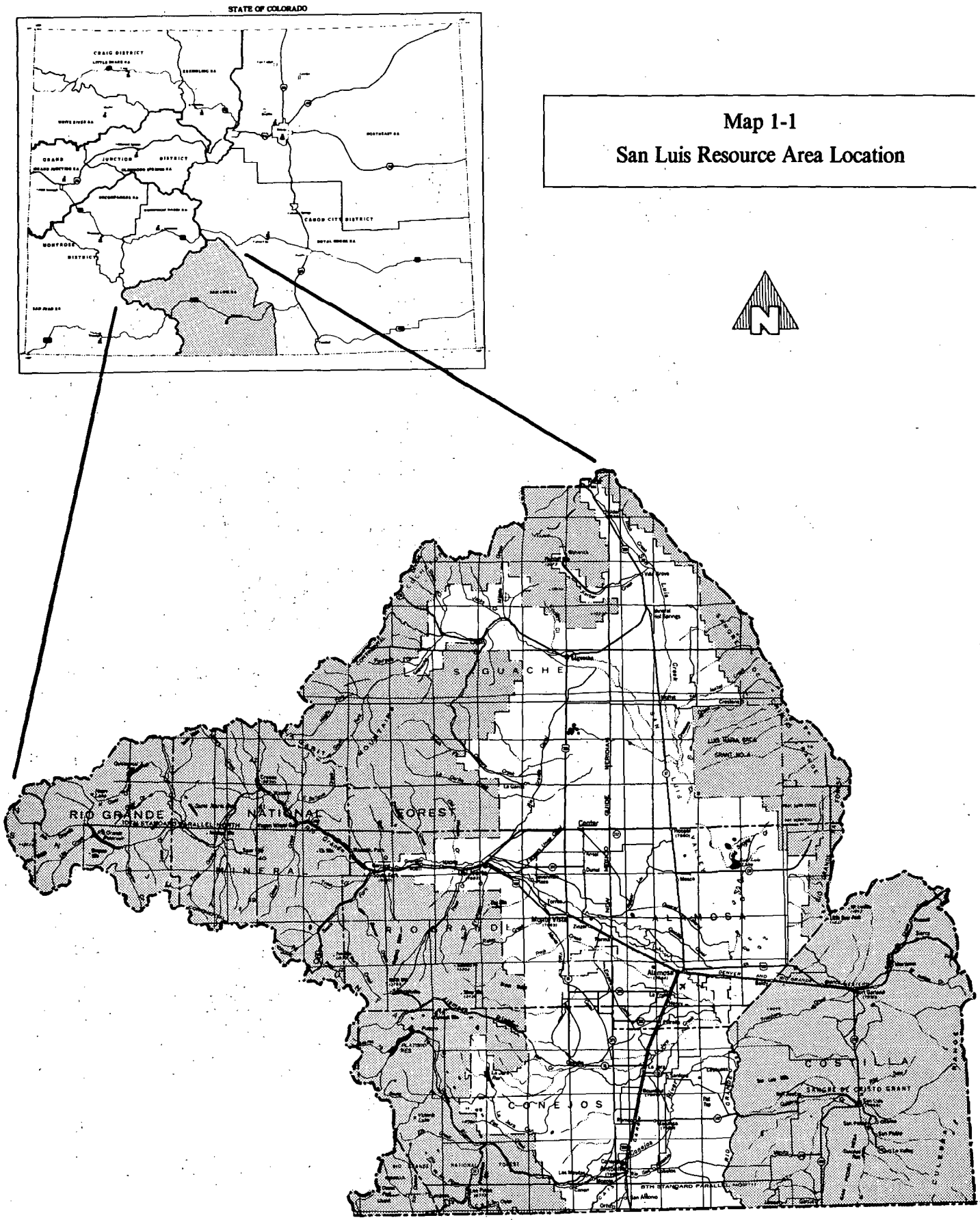
For purposes of analysis in this proposed RMP, a planning area has been designated, which is bordered on three sides by the Rio Grande National Forest and is within all or part of Saguache, Alamosa, Rio Grande, Conejos, and Costilla Counties. Of the total 1,971,000 acres in the planning area, approximately 54 percent is privately owned, less than 1 percent is managed by the U.S. Forest Service, about 4 percent is managed by the U.S. Park Service, about 2 percent is managed by the U.S. Fish and Wildlife Service, about 11 percent is administered by various state agencies (i.e., Colorado Division of Wildlife, Colorado Land Board Commission, etc.), about 2 percent is managed by other Federal agencies, and about 27 percent is managed by BLM. In addition, the BLM manages an additional 101,926 acres or about 5 percent as subsurface mineral estate, which underlies state and private surface land ownership. Fluid mineral leasing decisions for Federal mineral estate within the Rio Grande National Forest boundary will be the responsibility of the USFS in coordination with BLM and will be addressed in their planning and environmental process.

RELATIONSHIP TO THE PREFERRED ALTERNATIVE

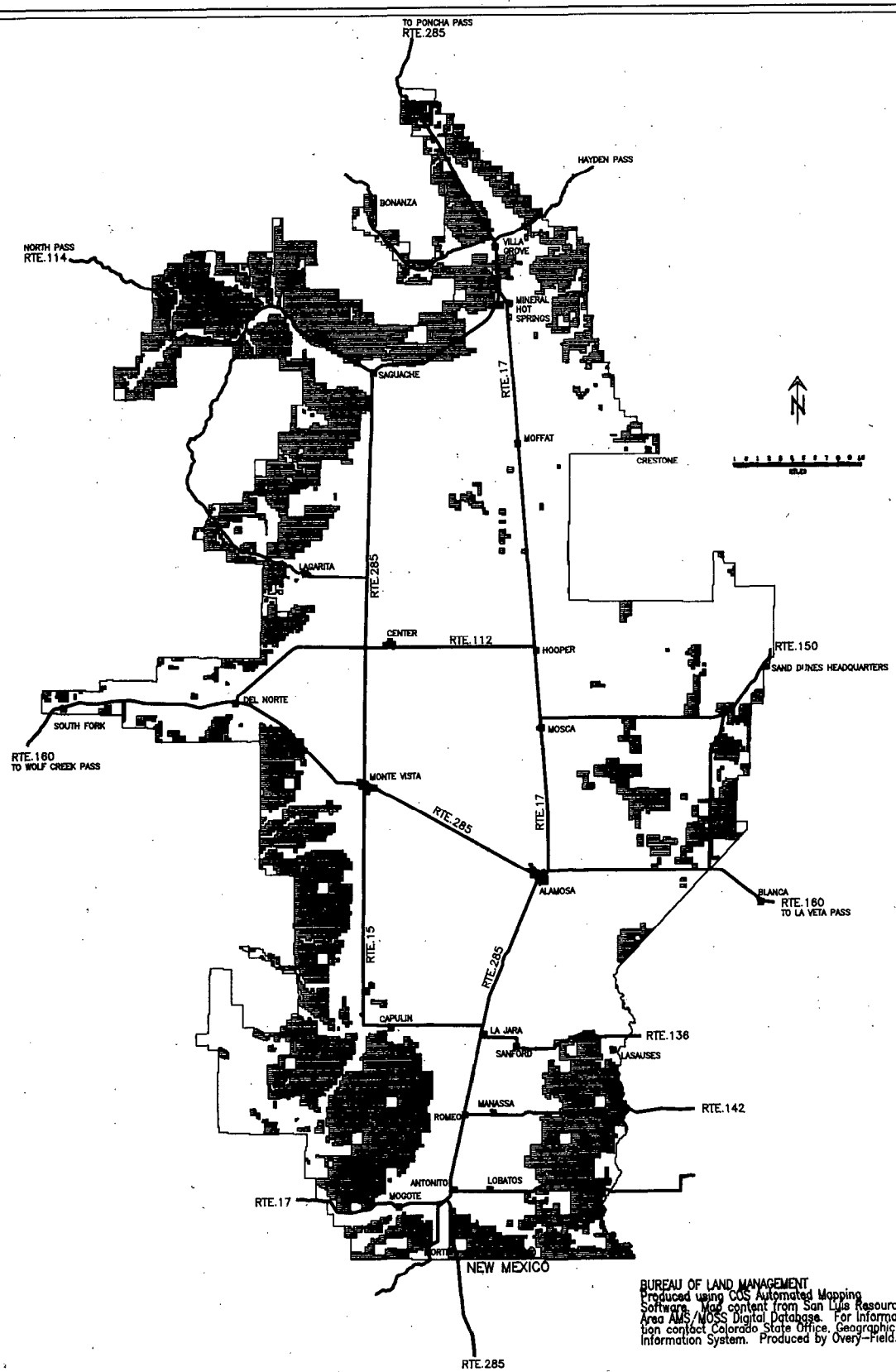
The proposed plan is very similar to the Preferred Alternative, which was analyzed in the draft RMP/EIS; however, some changes were made in response to public comments and internal BLM review. The major issues that precipitated these changes are as follows:

National Conservation Area (NCA) Proposal

There is an existing proposal to designate an NCA along the Rio Grande River Corridor within the Taos Resource Area. If this NCA becomes a reality, the Cañon City District will consider a joint study to determine a recommendation for the adjoining river corridor in Colorado. Changes in the proposed RMP/final EIS state that we believe NCA management is appropriate and viable especially in conjunction with a New Mexico NCA action. The Colorado portion alone may have sufficient resource significance to warrant a national area designation. The Flat Top Area, the San Luis Hills, the Piñon Hills, the entire river corridor up to Lasauses Cemetery, the wild and scenic river proposal, along with the New Mexico proposed NCA, would be combined into a new larger proposal. Language has been added in the proposed RMP/final EIS addressing the desirability of this congressional designation to protect the combined significant values in this area.

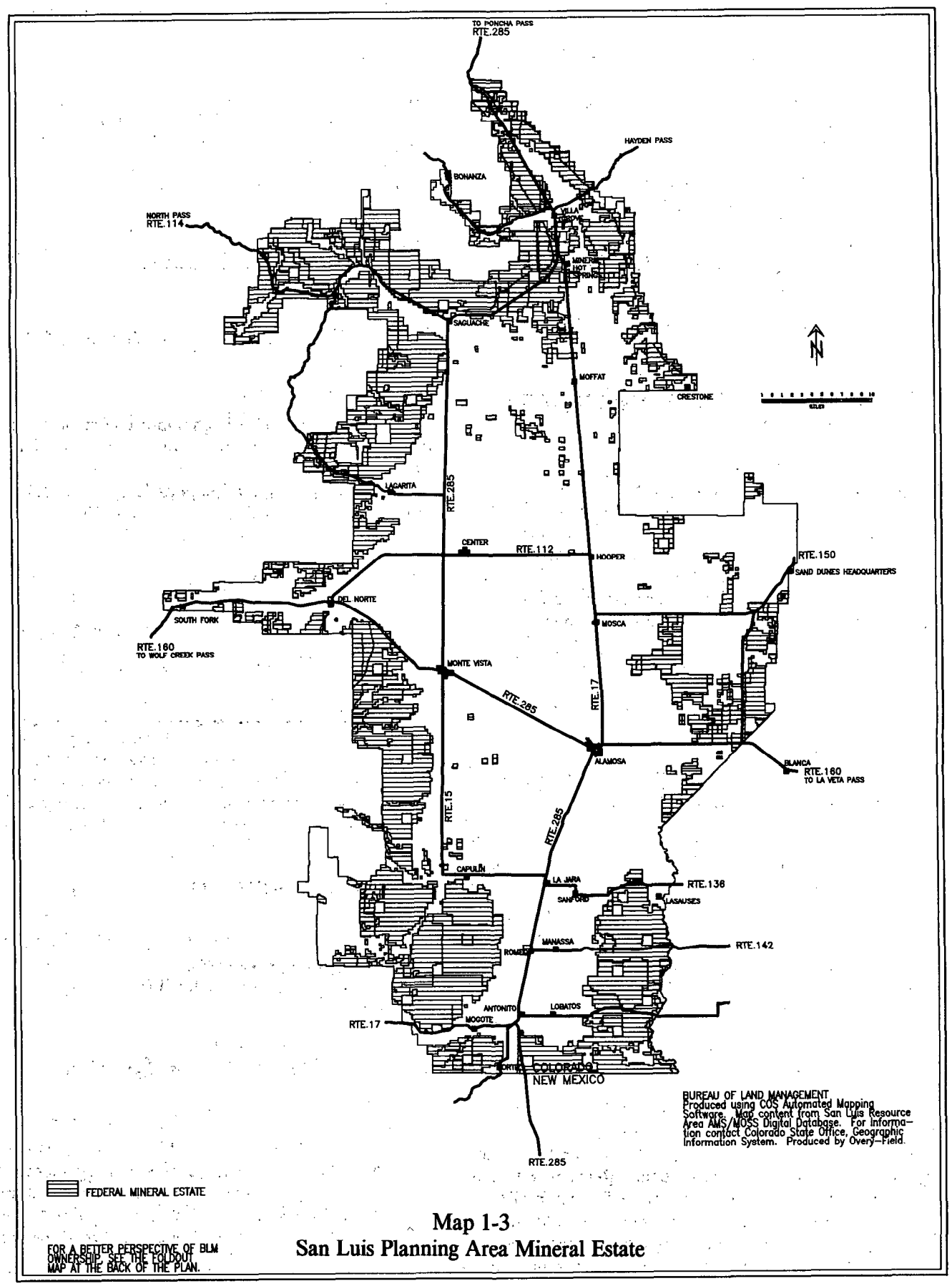


Map 1-1
San Luis Resource Area Location



Map 1-2
San Luis Resource Planning Area Location

FOR A BETTER PERSPECTIVE OF BLM OWNERSHIP, SEE THE FOLDOUT MAP AT THE BACK OF THE PLAN.



Map 1-3
San Luis Planning Area Mineral Estate

FOR A BETTER PERSPECTIVE OF BLM OWNERSHIP, SEE THE FOLDOUT MAP AT THE BACK OF THE PLAN.

Recreation Management

Two special recreation management areas (SRMAs), Penitente Canyon and Zapata Falls, were added as a result of input from internal BLM and public reviews.

Penitente Canyon SRMA has recently developed as a premier sport climbing area attracting visitors from across the U.S. and Europe. Use has reached approximately 10,000 visitor days annually and is expected to continue increasing necessitating intensive management. The focal point of the Zapata Falls SRMA is a 50-foot waterfall plunging through a narrow canyon. This highly scenic area is located adjacent to the major access route to the Great Sand Dunes National monument.

Wild and Scenic River Recommendation

All streams considered are now listed in the study report (Appendix A), and BLM rationale is explained as to why they were not considered to be eligible. All 41 miles of the Rio Grande River study corridor have been determined eligible by the wild and scenic river study team because of new information on wildlife values/visual resources/scenic viewshed/recreation values. The team stated, however, that Segment A would be considered suitable if 1) the U.S. Fish and and Wildlife Service (USF&WS) supported designation of this segment and 2) an agreeable cooperative management plan among USF&WS, BLM, and landowners could be developed.

In subsequent discussions with USF&WS, serious concerns were raised regarding their ability to properly manage and develop the refuge to meet their wetlands and waterfowl objectives should the refuge portion be designated as wild and scenic. Furthermore, because BLM controls so little of the river frontage, BLM management believes it would be extremely time consuming and costly to achieve cooperative management. The final management determination for the Rio Grande River, therefore, is as follows: Segments A, B, and C are determined eligible; Segments A and B are classified scenic, and Segment C is classified wild. Segments B and C are suitable; however, Segment A is not.

Clearly, Segments B and C (22 miles north of the New Mexico State line) contain significant values deserving of some enduring form of protection. This protection could be through wild and scenic river designation, national conservation area designation, or some other Federal legislative form of enduring protection. A Federal Register Notice for interim management of the Rio Grande River as a wild and scenic river was published on November 16, 1990 (Attachment 7, Appendix A). This protective management will continue for a period not to exceed 5 years from date of publication or until such time as a final decision has been made, whichever occurs first.

The water rights/quality write-up within the proposed RMP/final EIS has been enhanced to show as clearly and as succinctly as possible that: 1) The recommendation will not impact the valid existing rights including the water rights; and 2) The existing water conditions present are sufficient for the biological perpetuation of the stream environment.

Appropriate changes concerning the Rio Grande River are reflected in the study report, Appendix A, in this proposed RMP/final EIS.

Areas of Critical Environmental Concern

Three areas proposed through public comment to the draft RMP have been added in the proposed RMP/final EIS. These are: a) Ra Jadero Canyon as an ACEC; b) Elephant Rocks Area (with a modified boundary) as an ACEC; and c) Blanca Wildlife Habitat Area as an ACEC.

Lands Disposal

Two land disposal categories are used in this proposed RMP/final EIS . Category I lands, about 5,300 acres, meet the provisions of Section 203 of FLPMA; however, other methods of disposal will also be considered. The remainder of the resource area are Category II lands, and disposal will be considered on a case-by-case basis to enhance management or resource values or otherwise serve the public interest. All land disposal actions will be consistent with provisions in FLPMA. More details are displayed in the management common section in chapter 3 of this document.

Rights-of-Way

A new route alignment along the west side of the San Luis Hills has been proposed per the Western Utility Group (WUG)/Public Utility Company (PUC) proposal with some modifications.

Cultural/Recreational Conflict

All off-highway vehicle (OHV) limitations within the areas of critical environmental concern (ACECs) will be addressed in the coordinated resource management activity plans (CRMAPs). These will be completed for each special management area with emphasis on the use of both seasonal closures and establishment of designated roads and trails.

The OHV decision on the Sand Castle ACEC will be changed, and the OHV play area has been dropped. Resolution of the conflict among OHV, cultural, and ecological resources will be accomplished in the CRMAP.

Minerals

Closure of areas with significant riparian values to mineral development (NSO for leasables and no sale for salables) has been reanalyzed in the proposed RMP/final EIS.

Water Rights/Water Quality

More discussion on water rights related to river issues, to flow augmentation for new riparian or wetland development, and to the need for full compliance with the Colorado State Water Law has been added in the proposed RMP/final EIS. New water will be required to be developed and or augmented per Colorado State Water Law for any water needed for maintenance of riparian or wetland areas to maintain biological perpetuation. More discussion on water quality has been added in the proposed RMP/final EIS related to recreation and wildlife water contact.

Alternatives

No changes to other alternatives, except that the Preferred Alternative has been modified to address previously mentioned issues and is presented as the proposed plan.

CHANGES TO THE DRAFT RMP/EIS

Table 1-1 shows the changes and modifications made to the text and the maps of the draft RMP/EIS. Changes were made in response to public comments or to internal BLM review. This table does not include changes made to the proposed plan as they are described elsewhere in this document.

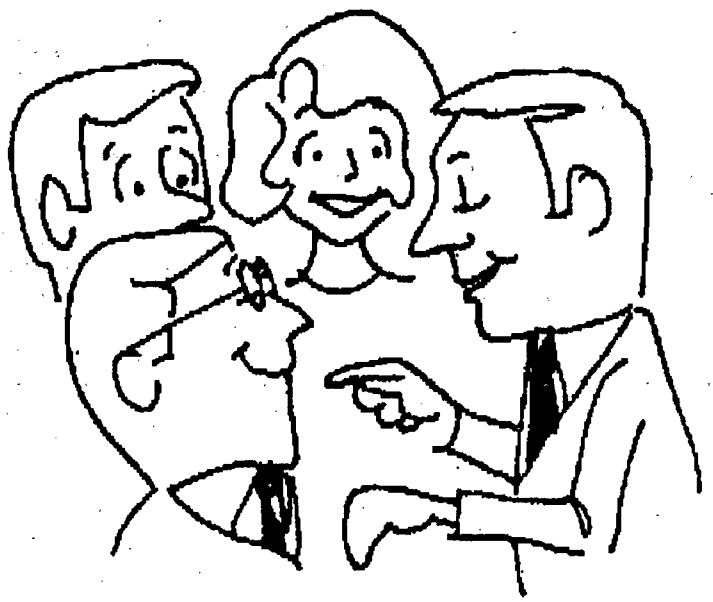


Table 1-1
CHANGES TO THE DRAFT RMP/EIS

Location of Change	Change
Summary, Table S-1, page S-2, Riparian Resource Management, second column, last line;	Change "70 to "125"
third column, fourth line;	Change "400" to "455"
fourth column, last line;	Change "70" to "125"
fifth column,third line	Change "400" to "455"
Summary, Table S-1, page S-3, Lands Tenure Adjustment Management, first column	Change "Lands Tenure Adjustment. . ." to "Lands Ownership Adjustment Management"
Summary, Table S-1, page S-3, Wildlife and Fish Habitat Management, first, second, third, and fourth columns, fourth paragraph, first line	Change "72" to "73.5"
Summary, Table S-1, page S-3, Forest and Woodlands Management, last column, f irst paragraph, second line;	Delete "(288 Mbf)"; add "185 Mbf (including 34 acres of regeneration harvest)"
second paragraph, second line	Delete "(633 cords)"; add "477 cords (53 acres of annual harvest)"
Chapter 1, Table 1-1, page 1-7, first column, first line	Change "Land Tenure Adjustment" to"Lands Ownership Adjustment Management"
Chapter 2, Water Resources, page 2-8, first column, second paragraph, first line	Change "56" to "57"
Chapter 2, Riparian Resources Management, page 2-17, Table 2-9, first and last line, last column respectively	Change "1,229" to "1,284" and "3,231" to "3,286"
Chapter 2, Riparian Resources Management, page 2-17, second column, second full paragraph, first and third lines respectively	Change "35.3" to "36.8" and "4.3" to ,"5.8"
Chapter 2, Riparian Resources Management, page 2-19, Table 2-10, preceding last line; last line	Add "La Garita Creek, 1.5, Fair, Improving." Change Total from "35.3" to "36.8"
Chapter 2, Riparian Resources Management, page 2-19, second column, last paragraph, sixth line.	Change "15.2" to "16.7"

Table 1-1 (Continued)

Location of Change	Change
Chapter 2, Land Tenure Adjustment, page 2-36, fourth paragraph	Delete paragraph. See revision in Relationship to the Preferred Alternative section, Lands Disposal, in this chapter.
Chapter 2, Land Tenure Adjustment, page 2-36, fifth paragraph	Change "57,000 acres" to "76,000 acres"
Chapter 2, Areas of Special Concern, page 2-53, second column, first sentence	Change ". . . Juan de Onate . . . ."to ". . . Don Diego de Vargas . . . .
Chapter 2, Areas of Special Concern, page 2-53, second column, third sentence	Change "During the 1840s . . . ." to "During the 1830s . . . ."
Chapter 2, Areas of Special Concern, page 2-53, second column, fifth sentence	Change " . . dating from the 1840s . . . " to ". . . dating from the 1830s ."
Chapter 2, Special Status Plant Species, page 2-59, first sentence.	Change "One plant species identified . . ." to "No plant species were identified as threatened or endangered on Federal or state lists within the planning area."
Chapter 2, Special Status Plant Species, page 2-59, second paragraph, first sentence.	Change "Sensitive plant associations . . ." to "High quality plant communities . . . ."
Chapter 2, Table 2-35, page 2-60, fourth column, first line	Change "LT" to "2"
Chapter 2, Table 2-35, page 60, fifth column, first three lines	Change "Canyon slopes . . . soil." to "Ponderosa savannah with fescue grassland on deep soils over volcanic substrates."
Chapter 2, Table 2-35, page 2-60, Footnote 1	Change to: "These rankings are provided by the Colorado Natural Areas Program (CNAP). This standardized ranking procedure was developed by CNAP to assist land managers in assessing status and management needs for plant species of special concern to the state of Colorado." "List 1. Federal threatened or endangered plant species that are rare throughout their range, including species endemic to Colorado. List 1*. Plant species presumed extinct.

Table 1-1 (Continued)

Location of Change	Change
	List 2*. Plant species presumed extirpated from Colorado
	List 2. 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. Plans of limited distribution or of special interest which appear secure at this time (watch list)."
Chapter 2, Table 2-35, page 2-60, footnote 2, first line	Change "Table 2.23-1 to Table 2-35"
Chapter 2, Table 2-36, page 2-62, second subheading in table	Change "Sensitive Plant Associations" to "High Quality Plant Communities"
Chapter 3, Water Resources, page 3-3,second column, fifth paragraph	Delete fifth paragraph beginning "A study is needed. . . .", add "In the event that reaches of the lower Rio Grande River are designated for special management under the *National Wild and Scenic Rivers Act*, no Federal claims for instream flows are anticipated; however, there is an implicit Federal reserved water right in the Act. Existing stream conditions are sufficient to satisfy the needs of any special management designations. Pending future designation, BLM may have to quantify needs and file through the Colorado State Water Court. The river is currently classified for water quality "recreation class I" and "aquatic life class I," and the existing quality meets the standards for these classifications."
Chapter 3, Geology, Topography, and Minerals, page 3-4, first column, second word, third line	Change "base" to "lease"
Chapter 3, Management Guidance Common to All Alternatives, page 3-5, first column, following third paragraph	Add "An inventory would be completed on an additional 1,413 acres with potential riparian values. If these areas have riparian values, they will be managed similarly to those riparian zones that are already known. The Ford Creek Riparian Demonstration Area and La Garita rehabilitation project would continue."

Table 1-1 (Continued)

Location of Change	Change
Chapter 3, Management Guidance Common To All Alternatives, page 3-6, immediately preceding Lands and Realty Management	Add "Forest and Woodland management It is the policy of BLM to maintain desired forest ecosystems. This could require that opportunities to manipulate vegetation in a manner advantageous to forest health, wildlife, fisheries, water, recreation, and range be implemented on the forested acres (including riparian areas) that are withdrawn from the allowable harvest base (21,150 acres or 78 percent of the commercial forest and 36,507 acres of 75 percent of the woodland forest). The withdrawal means that no planned harvest is scheduled from these acres, but other types of operations are not necessarily precluded. Adherence to proper environmental analysis and NEPA compliance would occur."
Chapter, 3, Special Status Plant and Animal Species, page 3-8, second line	Change "plant associations" to "plant communities."
Chapter 3, Riparian Resource Management, page 3-9, second paragraph	Delete paragraph
Chapter 3, Special Status Plant and Animal Species, page 3-13, first paragraph, third line	Replace "threatened and endangered" with "these special status . . . ."
Chapter 4, Access and Transportation Management, page 4-3, second column, third line.	Delete ". . .state and county. . ."; add ". . .BLM . . ."
Chapter 4, Economic Conditions and Social Environment, page 4-6, Table 4-5, Total, Preferred	Change 2,405,256 to 2,405,252
Chapter 4, Riparian Resources Management, page 4-9, first column, fourth line	Change "70" to "125"
Chapter 4, Riparian Resources Management, page 4-9, second column, third paragraph, fifth line following ". . . demonstration area). . . .	Add ". . . and rehabilitation of La Garita Creek" and change "70" to "125"
Chapter 4, Riparian Resources Management, page 4-16, second column, second line	Change "400" to "455"
Chapter 4, Riparian Resources Management, page 4-17, first column, fifth paragraph, third line	Change "335" to "390"
Chapter 4, Wildlife and Fish Habitat Management, page 4-18, first column, seventh paragraph, first line	Change "3,230" to "3,285"

Table 1-1 (Continued)

Location of Change	Change
Chapter 4, Riparian Resources Management, page 4-23, first column, third line following ". . . Ford Creek Riparian Demonstration Area"	Add "and La Garita rehabilitation project"
Chapter 4, Riparian Resources Management, page 4-24, first column, first paragraph, second line, following ". . . Demonstration Area)"; second line, fourth paragraph, fourth line	Add "and La Garita rehabilitation project"; change "70" to "125". Change "3,230" to "3,285"
Appendix B	Rewritten as Appendix C, Fluid Minerals Management, and included in this document
Appendix D	Revised to reflect changes made in livestock grazing since the San Luis Draft Resource Management Plan/ Environmental Statement was published September 1989 and included in this document
Appendix E	Rewritten as Appendix A, Rio Grande River Study Report and included in this document

DISTRIBUTION OF THE PROPOSED RMP/FINAL EIS

This proposed resource management plan and final environmental impact statement will be distributed to approximately 700 addressees, including all those who received the draft RMP/EIS. See Chapter 2 of this document for a listing of individuals, organizations, and agencies, who provided written comments, testified at public hearings, or requested copies of the draft RMP/EIS.

LIST OF PREPARERS

Bureau of Land Management staff and resource specialists, who provided resource data, coordinated input and revisions, and responded to public comments during the development and preparation of this proposed plan and final EIS are listed in Table 1-2.

Table 1-2
LIST OF PRMP/FEIS PREPARERS

Name	Assignment	Education	Years of Experience
Joe Kraayenbrink	Area Manager	BS-Wildlife and Fisheries Science	13
Royce Wheeler	Livestock Management, Vegetation, Acting Area Manager (3/87 through 7/87) (9/90 through 1/91)	BS-Range Management	21.5
Dennis Zachman	Area Manager (8/87 to 9/90)	BS-Outdoor Recreation Management	16.5
Dave Taliaferro	Project Manager	BS-Recreation Administration; MS-Recreation Resources	19.5
Glenn Wallace	Plan Coordinator for CSO Liaison	BA-Social Science	20.5
Ken Goodrow	Special Plant and Animal Species Technical Coordination	BS-Agriculture; BS-Botany-Ecology; MS-Botany-Ecology	26.5
Ade Neisius	Quality Control (Asst. District Manager for Land and Renewable Resources)	BS-Forest Management	24.5
Bev Neuben	Editor/Writer, Printing/Reproduction Coordination, and Administrative Coordination	On-the-job training; formal training sessions on English, grammar, writing, editing, and format	18.5
Kevin Andersen	Geology, Minerals, and Topography	BS-Geology	11.5
Bill Miller	Lands and Realty Management	BS-Forestry	16.5
Stuart Parker	Lands and Realty Management	BA-Economics	23.0
John Schwarz	Wildlife Habitat Management	BS-Wildlife Science	8.5
Clay Bridges	Wildlife Habitat Management	BS-Wildlife Management	21.0
JohnWilson	Forest and Woodlands, Wilderness, Recreation, and Visual Resources	BS-Forestry	26.0

Table 1-2 (Continued)

Name	Assignment	Education	Years of Experience
Jim Cunio	Forest and Woodlands	BS-Forestry	12.0
Fran Ackley	Riparian Resource Management	BS-Range/Forest Management	6.5
Fred Martinez	Access and Transportation, Hazards	Drafting Certification; on-the-job training; and formal engineering training	11.5
Scott F. Archer	Climate and Air Quality	BS-Environmental Science and Chemistry	12.5
Howard Wertsbaugh	WaterResources	BS-Watershed Management	25.5
Jeanette Pranzo	Economic Conditions and Social Environment	MA-Economics	18.5
John Beardsley	Paleontology and Archaeology	BA-Anthropology	13.5
Frederic Athearn	History and Areas of Special Concern, Photography, and CSO Planning Coordination	Ph.D-History	17.0
Harold May	Fire Management	On-the-job training and formal fire training	13.0
Bob Wick	Wilderness, Recreation, Visual Resources, Wild and Scenic River	BS-Forestry; MS-Wildland Recreation Management	4.0
Dave Harned	Waterpower/Storage	BS-General Engineering	25.5
Joan Larson	Typing and Clerical Support	On-the-job training; formal training sessions	7.5
Lona Kossnar	Administrative Support	On-the-job training; formal training sessions	21.5
Peggy Forbes-Crowl	Art Work (cover)	Free-lance	6.0

Table 1-2 (Continued)

Name	Assignment	Education	Years of Experience
Sam Richards	GIS/MOSS Data Entry	On-the-job training	0.75
Jeff Guy	GIS/MOSS Data Entry	BS-Landscape Architecture	0.50
Cañon City District Support		**Colorado State Office Support**	
Management Direction, Donnie Sparks		GIS Technical Assistance; Dave Taylor, Jim Sorenson, and Bill Kendall	

PROTEST PROCEDURES

Any person who participated in the planning process and has an interest that is or may be adversely affected by approval of the proposed RMP may file a written protest with the Director of the BLM. Protests must be filed within the 30-day period after the Environmental Protection Agency (EPA) publishes a notice of receipt, in the Federal Register, of this proposed RMP/final EIS.

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

A protesting party may raise only those issues that he or she submitted for the record during the planning process. New issues raised during the protest period should be directed to the Cañon City District or San Luis Resource Area Manager for consideration in plan implementation, as potential plan amendments, or as otherwise appropriate.

The period for filing a plan protest begins when the Environmental Protection Agency Notice of Availability of the final environmental impact statement containing the proposed RMP or amendment is published in the Federal Register. 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, your protest should be sent by certified mail, return receipt requested. Protests must be filed 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 San Luis Proposed Resource Management Plan/Final Environmental Impact Statement 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 BLM State Director's 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, available planning records (e.g., meeting minutes or summaries, correspondence, etc.). A protest that only expresses disagreement with the Colorado State Director's proposed decision without any data will not be considered.

CHAPTER 2
PUBLIC COMMENTS ON THE DRAFT RMP/EIS

CHAPTER 2

PUBLIC COMMENTS ON THE DRAFT RMP/EIS

AVAILABILITY OF THE DRAFT RMP/EIS

The Draft San Luis RMP/EIS was filed with the Environmental Protection Agency (EPA) in September 1989. A notice of availability and an announcement of the public hearings schedule was published in the Federal Register, September 29, 1989, pages 40216/40217. This same notice established a 90-day public comment period expiring December 26, 1989.

News releases provided information on obtaining copies of the draft RMP/EIS; locations where the draft could be reviewed; locations, dates, and times of the formal public hearings; and the address for submission of written comments. Bulletins were also mailed to the agencies, groups, and individuals who had been involved with the team during the planning process.

Public hearings were held in Denver, Colorado, on November 1, 1989, and in Alamosa, Colorado, on November 2, 1989.

PUBLIC COMMENTS

During the comment period (September 15 through December 26), 186 people commented on the Draft San Luis Resource Management Plan and Environmental Impact Statement.

A total of 178 letters were received; 153 during the comment period and 25 after the period closed. All the letters were acknowledged, and a response to each substantive comment received prior to December 26 is printed in this proposed plan. Each of the 153 letters received during the comment period are also displayed in Appendix B of this document.

Public hearings in Alamosa were well attended with 46 people; 23 gave testimony. The public hearings in Lakewood were attended by 14 people, and 10 people gave oral comments (see Appendix B). A response to substantive oral comments is also printed in the proposed plan.

The majority of the comments related to designation of ACECs, wild and scenic river designation, the Taos powerline proposal, and grazing allocations. Approximately 118 commenters indicated more of the Rio Grande River should be recommended for wild and scenic designation; 27 commenters addressed concerns about water rights and objected to any portion of the river being recommended for designation; over 78 commenters indicated support for expanding ACEC designation; however, 83 believed inadequate protection is provided for these areas; e.g., OHV, mining, and grazing are considered inappropriate use within an ACEC. Many requested the addition of other ACECs; i.e., 78 for Elephant Rocks, 21 for Bishop Rock, 3 for the Blanca Wildlife Habitat Area, and 6 for Ra Jadero Canyon. There were 65 letters opposing the proposed location of the Taos powerline. A large number of the commenters indicated conflict between cultural and OHV use. At least 27 commenters indicated some conflict between water rights and wild and scenic designation. Some commenters indicated support for the Natural Enhancement Alternative. Establishment of a national conservation area, encompassing the Rio Grande River and San Luis Hills ACECs, was suggested. Both support and opposition were expressed regarding the sand dune OHV area. Input on the RMP/EIS is appreciated, and each comment was considered in the preparation of this proposed plan and final EIS.

SUMMARY OF PUBLIC INVOLVEMENT THROUGHOUT THE PLANNING PROCESS

A total of 302 public contacts have been recorded to date consisting of 183 personal letters, 3 form letters, 70 personal/telephone conversations, 31 testimonies, 9 BLM comment forms, and 6 other types. Fifty-six percent of the comments have been from individuals and 84 percent were from Colorado. A total of 12 percent of the comments were from Alamosa County, 55 percent from counties outside the planning area, 17 percent from counties outside Colorado, and the remaining 16 percent came from various counties within the planning area. Of the total input, 205 (67 percent) had substantive comments.

DISTRIBUTION OF THE DRAFT RMP/EIS

Approximately 660 copies of the draft RMP/EIS were distributed to Federal, state, and local governmental agencies, congressional and legislative offices, private interest groups, and organizations, academic and business institutions, and individuals. Distribution was by volume mailing; however, many copies were also distributed at public hearings and in response to requests for the document. Copies of the document were also available for public review and distribution in the BLM San Luis Resource Area Office, Cañon City District Office, and Colorado State Office.

The following distribution list for the draft RMP/EIS includes only the agencies, organizations, and individuals on the original mailing list:

FEDERAL GOVERNMENT

Advisory Council on Hist. Preservation

Great Sand Dunes National Monument

Library of Congress, Unit X

Documents Expediting Project

Smithsonian Institution

Southern Ute Indian Tribal Council
  c/o Betty Feazel

The Honorable Ben Nighthorse Campbell
  Pueblo, CO
  Washington, DC

The Honorable Dan Schaefer
  Englewood, CO
  Washington, DC

The Honorable David Skaggs
  Westminster, CO
  Washington, DC

The Honorable Hank Brown
  La Junta, CO
  Washington, DC

The Honorable Joel Hefley
  Colorado Springs, CO
  Washington, DC

The Honorable Pat Schroeder
  Denver, CO
  Washington, DC

The Honorable Timothy E. Wirth
  Colorado Springs, CO
  Washington, DC

The Honorable William L. Armstrong
  Pueblo, CO
  Washington, DC

U.S. Department of Health and Human Services

U.S. Army Corps of Engineers
  San Francisco, CA
  Dallas, TX

U.S. Colorado Soil Conservation Office

U.S. Department of Energy

U.S. Department of Transportation

U.S. Environmental Protection Agency
  Denver, CO
  Washington, DC

U.S. Federal Highway Administration

U.S. National Park Service

U.S. Pentagon, Assistant Secretary of the Air Force

U.S. Rio Grande Soil Conservation District

USAF Bolling Air Force Base

USAFRCE-CR-ROV

USDA Forest Service
  Off. of Envir. Coord., Washington, DC
  Rocky Mountain Region, Lakewood, CO
  Carson N.F., Taos, NM
  Rio Grande N.F., Monte Vista, CO
  Alamosa RD, Alamosa, CO
  Conejos RD, La Jara, CO
  Del Norte RD, Del Norte, CO
  Saguache RD, Saguache, CO

USDA, SCS
  Center FO, Center, CO
  La Jara FO, La Jara, CO
  Monte Vista FO, Monte Vista, CO

USDI; BLM
  Washington Office
  Off. of Sec., Denver, CO
  Colorado State Office
  BLM, Library D-533A
  Albuquerque District Office
  Burns District Office
  Montrose District Office

Bishop Resource Area Office
Gunnison Basin Resource Area Office
Royal Gorge Resource Area Office
San Juan Basin Resource Area Office
San Luis Resource Area Office
Socorro Resource Area Office
Taos Resource Area Office
USDI; Bureau of Mines
Branch of Min. Ass., Washington, DC
Alaska Field Operations, Washington, DC
Denver, CO - DSC Bldg 20
USDI; Bureau of Reclamation
Division of Envir. Aff., Washington, DC
Denver, CO
Loveland, CO
Closed Basin Proj. Off., Alamosa, CO
Eastern Colo. Proj. Off., Salida, CO
Southwest Reg. Off., Amarillo, TX
USDI; Fish and Wildlife Service
Chief, Div. of Envir. Coord., Washington, DC
Regional Office, Denver, CO
Alamosa and Monte Vista Wildlife Refuge
USDI; Geological Survey
Envir. Aff. Program, Reston, VA
Geologic Division, Denver, CO
Water Resources Division, Denver, CO
USDI; Minerals Management Service
Offshore Envir. Ass. Div., Washington, DC
USDI; National Park Service
Div of Envir. Comp., Washington, DC
Denver, CO
Rocky Mountain Reg. Off., Denver, CO
USDI; Office of Env. Project Review
Denver, CO
USDI; Office of Surface Mining
Chief, Div. of Envir. and Econ. Analysis, Washington, DC
USDI; Office of the Secretary
USDI; Water and Power Resources Service
USDI; Fish and Wildlife Service
Golden, CO - Colorado Field Office

STATE GOVERNMENT

Adams State College
Colorado Board of Land Commissioners
Denver, CO
Alamosa, CO
Colorado State Clearing House
Colorado Department of Health
Air Pollution Control Division
Water Quality Control Division
Colorado Department of Highways
Denver, CO
Pueblo, CO
Colorado Depart. of Local Affairs
Colorado Depart. of Natural Resources
Colorado Division of Mines
Colorado Div. of Parks and Rec.
Denver
Colorado Springs
Walsenburg
Colorado Division of Water Resources
Denver, CO
Alamosa, CO

Colorado Division of Wildlife
Denver
Regional Office, Colorado Springs
Southwest Regional Office, Montrose
Area Office, Monte Vista, CO
Colorado Environmental Coordinator
Colorado Forest Service
Alamosa, CO
Fort Collins, CO

Colorado Geological Survey
Colorado Legislative Council
Colorado Natural Areas Program
Colorado Oil and Gas Conservation Commission
Colorado Plans Coordinator
Colorado State Historical Society
Colorado State University
  Department of Recreational Resources
  Department of Fisheries and Wildlife Biology
  Experimental Learning Center
  Documents Librarian
Colorado Water Conservation Board
Colorado Highway Department
Lt. Governor Michael Callihan
The Honorable Bob Kirscht
  Pueblo, CO
The Honorable Gilbert Romero
  Pueblo, CO
The Honorable Harold L. McCormick
  Canon City, CO
The Honorable Jim Rizzuto
  Swink, CO
The Honorable John Beno
  Pueblo, CO
The Honorable Larry E. Trujillo
  Pueblo, CO
The Honorable Lee E. Gillis
  Lamar, CO
The Honorable Lewis H. Entz
  Hooper, CO
The Honorable Robert N. Shoemaker
  Canon City, CO
The Honorable Roy Romer
  Denver, CO
The Honorable Stanley E. Johnson
  Pueblo, CO
University of Colorado

LOCAL GOVERNMENT

Alamosa (City)
Alamosa County
Antonito (City)
Carnegie Public Library
  Monte Vista, CO
Conejos County
Conejos County Library
Costilla County Administrator
Costilla County Planning Director
Del Norte Public Library
Denver Public Library
Library, Center Branch
Mineral County
Rio Arriba County
Rio Grande County
Saguache County
Saguache Public Library
San Luis Valley Regional Development and Planning Commission
Southern Peaks Regional Library
Taos County

INDIVIDUAL/ORGANIZATION

Adventures International
Aguilar Energy Company
Alamosa Valley Courier
Allison, Mark
Amax Incorporated
American Rivers, Inc.
American Wilderness Alliance
Amoco Production Company
Anderson, Phil
Anpu, S.B.
Anschutz Corporation
Armagast, Bob and Judy
Asper, Darwin E.
Atkins, Larry E.
Atlas Corporation
Belton, Terry
Benson, Harold
Benson, Norman
Birdsall, Fred
Blackgoat, Fernando
Bouchard, Thomas
Bryant, Pete
Callison, Charles H.
Cameron, Brad
Catalano, Dwight
Chevron Resources Company

Chevron USA, Inc.
Clifton, Chas
Club 20
Coleman, Jim
Coleman, Polly
Colorado Assn. of 4WD Clubs
Colorado Assn. of Motorcyclists
Colorado Boat Owners Task Force
Colorado Cattlemen's Assn.
Colorado Counties, Incorporated
Colorado Environmental Coalition
Colorado Farm Bureau
Colorado Federation Mineralogical Society
Colorado League of Women Voters
Colorado Mining Association
Colorado Motorcycle Dealers Assn.
Colorado Motorcycle Trail Riders Assn.
Colorado Outdoor Education Center
Colorado Snowmobile Assn.
Colorado Sports Riders Association
Colorado Wildlife Federation
  Denver, CO
  Colorado Springs, CO
Colorado Woolgrowers Association
Colorado Association of Four Wheel Drive Club
Colville, Ruth M.
Conejos County Woolgrowers
Congdon & Carey Association
Conservation Committee
Cotter Corporation
Coyle, Kevin J.
Crespin, Paul
Crowther, Ed
Cyprus Mines Corporation
Davey, Earl
Davey, John L.
Davis, Floyd M.
Dubois, Delafield
DiCenzo, Stephanie B.
Dixon, Hobart N., PH.D.
Duran, Michael
Environmental Center
Evans, Peter
Eve, Thomas M.
Exxon Company USA
  Denver - Tom Cirigliano
Exxon Company USA
  Reg. Aff. Super. Midland, Texas
Falcon Head Mailing Services
Federal Land Bank
Fettes, Joe Jr.
Fremont Ecology
Friends of the Dunes, Inc.
Frye, Ken
Galatowitsch, Sue
Gallegos, George
Garretson, Gary
Gibb, Henry
Goldcrest, LTD.
Gregory, Lee
Grennel, Bill
Gronning Engineer Company
Grupton
Gumaer, Dorothy V.
Harris, Jim
Harvey, Constance
Harvey, Norman
Heller, Clive
High Chateau
High Country News
Homestake Mining Company
  Creede, CO
  Golden, CO
Hughes, Mark
Independent Petro Association of Mtn States
Izaak Walton League of America Inc.
Jensen, Debbie
John, Larry J.
Johnston, Bob Jr.
Jones, Brad
Kerr McGee Center
Klecker, Jan L.
Kopfman, Lynn
Kuharich, Rod
Kuntz, David W.
Lazy "T" Inc.

Linden, Julie K.
Marathon Oil Company
Marr, John G.
Martin, Susan A.
Martinez, Jim
McClellan, Roz
Meyer, Art
Minerals Exploration Coalition
Mobile Exploration and Producing
Molycorp, Inc.
Montgomery, Dave
Morley, K. S.
Mountain Bike Specialists
Mueller, Eleanor C.
Naslund, Dave
National Organization for River Sports
National Wildlife Federation
Natural Resource Defense Council, Inc.
Nature Conservancy
Nielsen, Ed
Noranda Exploration, Inc.
Oaks, Floyd Jr.
Oliver, Chuck
Oliver, Mike
Pacific Coast Mines
Pat Humphry
Peacples, Sarah
Phelps Dodge Corporation
Public Service Company of Colorado
Puckett, Catherine
Pueblo Chieftain
  Cañon City, CO
Pueblo Chieftain
  Pueblo, CO
Quinlan, Wayne
Rampart Range M-C Management Committee
Rehberg, Jeff
Rocky Mountain Enduro Club
Rocky Mountain Oil and Gas Association
Rocky Mountain Trails Association
Scherling, Bev
Schmittel, Kenneth
Schultz, Robert L.
Lake of the Falls Parkway
Shell Oil Company
Sierra Club
  Washington DC
Sierra Club
  Denver, CO
Sierra Outfitters and Guides of Taos Inc.
Simmons, Virginia McConnel
Sizemore
Smallowitz, Howard
Sowards, Vaughn
Spearman, Mike
Spero, Vince
Stahlecker, Paul
Stansfield, John
Steck, John
Strait, Richard A.
Suiter, Gary
Swanson, John R.
Sylvester, Thomas
Temple, Danny
Texaco Incorporated
Thatcher, John H.
The Humane Society of the United States
The Wilderness Society
  Washington, DC
The Wilderness Society
  Denver, CO
Tolisano, Jim
Union Carbide Corporation
United Four Wheel Drive Association
  Englewood, CO
  Tucson, AZ
Valdez, Rudolph
Valdez, Virgil
Van Epps, Charles P.
Van Gieson, J.R.
Ward, Larry
Welch, Jack
Welhelm, Bert
Wellman, Bill
Western Archeological Consultants, Inc.
Western Colorado Congress

Western Energy Company
Western River Guides Association
Western Utility Group
Wheeler, Marty
Whetherill, Clayton
Whitten and Schreck Grading
Whitten, George Jr.
Wilson, Harry E.
Wilson, Thurman
Yeager, Kelly
Young, J.T.

PUBLIC COMMENTS FROM LETTERS

One hundred and seventy-eight persons, groups, or agencies submitted written comments on the Draft San Luis RMP/EIS. One hundred and fifty-three of these were in the form of letters that arrived before the close of the comment period. Table 2-1 lists those comments considered to be substantial in the order they were received, by the comment letter number, and by the identified comment/response number(s).

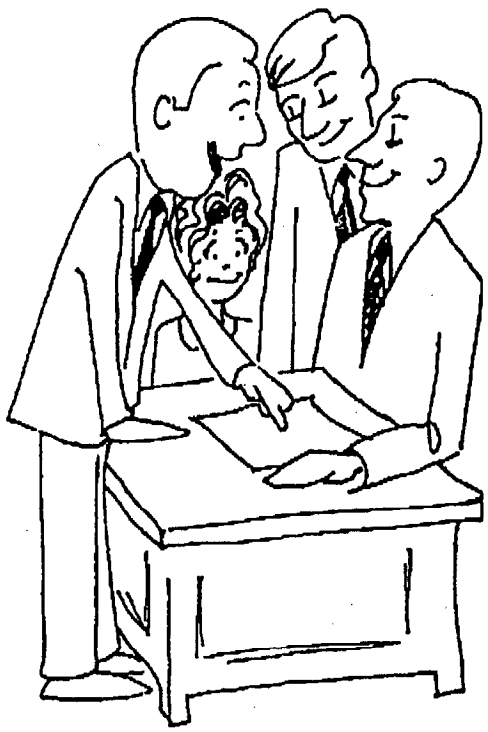


Table 2-1
PUBLIC WRITTEN COMMENTS ON THE SAN LUIS DRAFT RMP/EIS

Letter Number	Commenter	Comment/Response Number(s)
1	U.S. Dept. of the Air Force	1-1
2	William M. Folger	2-1 - 2-4
4	William A. Coates	4-1 - 4-4
5	John Spezie	5-1 - 5-5
6	Adopt-A-Trail, Bill Hughs	6-1 -6-2
7	Lucile Jones	7-1 -7-4
8	Trout Unlimited, Dean Swanson	8-1 -8-4
9	Ray "Lone Eagle" Miller	9-1 - 9-5
10	USDI, Bureau of Mines	10-1
11	Brad Cameron	11-1 -11-3
12	Pat Humphry	12-1 - 12-5
13	Constance Harvey	13-1 - 13-5
14	Henry Gibb	14-1 -14-4
15	Hobart N. Dixon	15-1 - 15-8
16	Trailhead Ventures, Dick and Jan Scar	16-1 - 16-3
17	G. K. Marsh	17-1 - 17-3
18	Rocky Smith	18-1 - 18-5
19	Daniel D. Chiras, Ph.D	19-1 - 19-4
20	Babs Schmoler	20-1 -20-5
21	Steve Smith	21-1 - 21-2
22	Michelle Matisans	22-1 - 22-5
23	John B. Czarnecki, Ph.D.	23-1 - 23-4
24	Christine Cipriano	24-1 - 24-4
25	Dennis B. Williams	25-1 - 25-3
26	Margaret Roberts	26-1 - 26-3
27	Todd Robertson	27-1 - 27-4
28	Stanley Tolbe	28-1 - 28-4
29	Yvonne Mohr	29-1 - 29-5
30	Bruce Mohr	30-1 - 30-5
31	Max Fry	31-1 - 31-5
32	Amy Swiatek	32-1 - 32-3
33	Heather Schaal	33-1 - 33-3
34	Kirsten Ingebrigtsen	34-1 - 34-4
35	John Ziegman	35-1 - 35-2
36	Judith E. Rocchio	36-1 - 36-4
37	Norman J. Mullen	37-1 - 37-6

Table 2-1 (Continued)

Letter Number	Commenter	Comment/Response Number(s)
38	Don Thompson	38-1 - 38-2
39	Michael Goldstein	39-1 - 39-4
40	Kirk Cunningham	40-1 - 40-2
41	Linda Batlin	41-1 - 41-2
42	John M. Wade	42-1 - 42-4
43	Mary Poss	43-1 - 43-4
44	Eric Nickell	44-1 - 44-4
45	Gary Sprung	45-1 - 45-2
46	Jesse Ross, Luke Ross, Tom Ezrie	46-1
47	Jon H. Fairchild	47-1
48	Brennan Linsley	48-1 - 48-3
49	Linda M. Lee	49-1 - 49-2
50	Jill Ludeman	50-1
51	Cyndi Shuler	51-1
52	Sandy Lewenberg	52-1 - 52-4
53	Lowell Soster	53-1 - 53-3
54	Kathy Cox	54-1 - 54-2
55	Roger Cox	55-1 - 55-6
56	Carmen Blumberg	56-1 - 56-4
57	Nate Inouye	57-1 - 57-2
58	Meg Stephenson	58-1 - 58-2
59	Steve Arrowsmith	59-1 - 59-5
60	Boulder Audubon Society, M. K. Smith	60-1 - 60-4
61	Nard Claar	61- 1 - 61-4
62	Jeff	62-1 - 62-3
63	Dorothy H. Bradley	63-1 - 63-2
64	Jamie Kingsbury	64-1
65	E. S. Rock	65-1
66	Don Potter	66-1 - 66-3
64	Jamie Kingsbury	64-1
65	E. S. Rock	65-1
66	Don Potter	66-1 - 66-3
67	Susan Eble	67-1 - 67-4
68	Lucinda R. Smith	68-1 - 68-1
69	Elizabeth T. Feazel	69-1 - 69-3
70	Len Anzell	70-1 -70-5
71	Pedro Paramo	71-1

Table 2-1 (Continued)

Letter Number	Commenter	Comment/Response Number(s)
72	Tony Merten	72-1 - 72-5
73	Gary Steinberg	73-1 - 73-5
74	Richard Bradley	74-1 - 74-3
75	Tony Merten	75-1 - 75-4
76	Bruce Berger	76-1 - 76-2
77	Cyndra Dietz	77-1 - 77-5
78	Mike Cockrell	78-1 - 78-5
79	Caleb Gates	79-1 - 79-4
80	Colo. Hist. Soc., Barbara Sudler (SHPO)	80-1 - 80-3
81	Sierra Club, Rocky Mtn. Chp., Mark Pearson	81-1 - 81-4
82	Chelsea Schwartz	82-1 - 82-5
83	Georgia Smith	83-1 - 83-2
84	Chris Allen	84-1 - 84-4
85	Jan Hose	85-1 - 85-5
86	Nicole Moore	86-1 - 86-5
87	Stan K. Munson	87-1
88	Eric Zann	88-1 - 88-4
89	Michael Boeder	89-1
91	Colo. Env. Coalition, Kirk Koepsel	91-1 - 34
92	Colo. Div. of Wildlife, Monte Vista Office	92-1 - 92-4
93	Dept. of Health & Human Svcs., Kenneth Holt	93-1 - 93-3
94	Kristine Johnson	94-1 - 94-5
95	Brian Shields	95-1 - 95-2
96	Margaret Murray	96-1 - 96-3
97	Ruth Marie Colville	97-1
98	Anna Auster	98-1 - 98-3
99	Francie Pedro	99-1 - 99-3
100	Molly Schroeder	100-1 - 100-3
101	Lawrence M. and Jeanette S. Currier	101-1 - 101-4
102	Paul W. Motsinger	102-1 - 102-3
103	Kathy Hands	103-1 - 103-3
104	John B. Shawcroft	104-1 - 104-11
105	John M. Muste	105-1 - 105-2
106	Jane Stanfield	106-1 - 106-5
107	Rio Grande Water Cons. Dist., Lynn Kopfman	107-1 - 107-24
108	John Kuzmiak	108-1 - 108-3
109	Southwest Nat. & Cul. Heritage Assn.	109-1 - 109-4

Table 2-1 (Continued)

Letter Number	Commenter	Comment/Response Number(s)
110	San Luis Valley Water Cons. Dist., Richard Messick	110-1 - 110-6
111	USDI, Fish and Wildlife Svc., Robert Leachman	111-1 - 111-2
112	Thomas B. McArthur	112-1 - 112-2
113	Dion Stewart	113-1
114	USDI, National Park Svc., Richard A. Strait	114-1 - 114-12
115	Charles Myers	115-1 - 115-4
116	Colo. House of Rep., Lewis H. Entz	116-1 - 116-3
117	Mary Beth Peters	117-1 - 117-4
118	Town of Del Norte, Barney B. Black	118-1 - 118-13
119	The Rio Grande Water Users Assn., Bill V. Kopfman	119-1 - 119-8
120	William S. Contes	120-1
121	Telluride Institute, Leigh Sullivan	121-1 - 121-2
122	Conejos Water Cons. Dist., Kelly Sowards	122-1 - 122-13
123	Rocky Mtn. Oil and Gas, Alice Frell Benitez	123-1 - 123-3
124	City of Monte Vista, Ronald Schulz	124-1 - 124-5
125	Eleanor C. Mueller	125-1 - 125-5
126	Public Service Co. of Colorado, John Steck	126-1 - 126-3
127	American Rivers	127-1 - 127-15
128	Office of the State Engineer, Jeris A. Danielson	128-1 - 128-7
129	Ken Nelson	129-1 - 129-4
130	Carol Wildman	130-1 - 130-2
131	Kathy Miller	131-1 - 131-2
132	Mary Humphrey	132-1 - 132-8
133	Elizabeth Chesley Duson	133-1 - 133-4
134	Louise Rose	134-1 - 134-4
135	James T. Del Golyer	135-1 - 135-13
136	Robert M. Armagast	136-1
137	Patricia A. D'Andrea	137-1 - 137-2
138	Cynthia Patterson	138-1 - 138-5
139	Bob Stewart	139-1
140	Susan S. Martin, Ph.D.	140-1 - 140-2
141	Susann McCarthy	141-1 - 141-2
142	Avril Fogden	142-1
143	Ed Haywood	143-1 - 143-3
144	John R. Swanson	144-1 - 144-6
145	Sierra Club, Pikes Peak Group, John Stansfield	145-1 - 145-22

Table 2-1 (Continued)

Letter Number	Commenter	Comment/Response Number(s)
146	William L. Stevens	146-1 - 146-2
147	Caroline Gray Wolf	147-1 - 147-3
148	Philip Cole	148-1 - 148-3
149	M. P. Steinkamp, Ph.D.	149-1 - 149-2
150	Colo. Native Plant Society, Susan S. Martin	150-1 - 150-12
151	Michael Levison	151-1
152	Div. of Parks & Outdoor Rec., Colo. Nat.Areas Prog., Dave Kuntz	152-1 - 152-29
153	USDI, Nat. Park Svc., Great Sand Dunes, Nat. Mon., William E. Wellman	153-1 - 153-8

PUBLIC COMMENTS FROM HEARINGS

Thirty-three persons, groups, or agencies gave oral testimony/comments on the San Luis Draft RMP/EIS during the four public hearing sessions in Denver and Alamosa, November 1 and 2, 1989. One person commented twice at the hearing in Denver. Table 2-2 lists those comments considered to be substantial in the order they were given, by the commenter, and by the identified comment/response number(s).

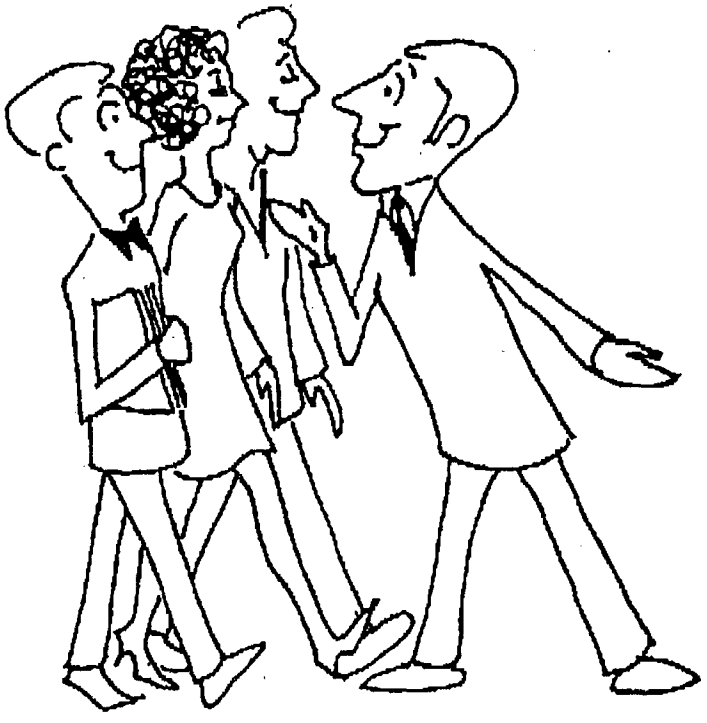


Table 2-2
PUBLIC HEARING COMMENTS ON THE SAN LUIS DRAFT RMP/EIS

Commenter Number	Commenter	Comment/Response Number(s)
H1	Dion Stewart	H1-1
H2	Abe Reylea	H2-1
H3	Bill Kopfman	H3-1
H4	Barry Nelson	H4-1 - H4-2
H5	Melvin Getz	H5-1 - H5-2
H6	Judy Armagast	H6-1 - H6-4
H7	Bob Myers	H7-1
H8	Charles Stillings	H8-1 - H8-2
H9	Steve Vandiver	H9-1 - H9-4
H10	Elise Rudolph	H10-1
H11	Margaret Robertson	H11-1 - H11-6
H12	Cliff Hartman	H12-1
H13	Kelly Sowards	H13-1
H15	Willian Lynn Kopfman	H15-1 - H15-2
H16	Robert Teem	H16-1 - H16-2
H17	Dave Jones	H17-1
H18	Dave Robbins	H18-1 - H18-13
H19	Hobart Dixon	H19-1 - H19-4
H20	Dennis Stanford	H20-1 - H20-2
H21	Bob Kennemer	H21-1 - H21-3
H22	Don Richmond	H22-1
H23	Freeman Lester	H23-1
H24	Dennis Williams	H24-1 - H24-5
H25	Kirk Cunningham	H25-1 - H25-4
H26	Kirk Koepsel	H26- 1 - H26-13
H27	Don Thompson	H27-1 - H27-4
H28	Sarah Peapples	H28-1 - H28-4
H29	Kurt Menning	H29-1 - H29-4
H30	Jerome Michel	H30-1 - H30-3
H31	Henry Gibb	H31-1 - H31-4
H32	Roz McClellan	H32-1 - H32-3
H33	Margaret Murray	H33-1 - H33-5
H34	Kirk Koepsel	H34-1 - H34-5

PUBLIC COMMENTS AND RESPONSES

This chapter presents BLM responses to public comments submitted during the public review/comment period on the draft RMP/EIS. The response numbers correspond to the numbers on the margins of the letter or transcript. The letter number or hearing transcript alphanumeric code gives the type of comment and the individual commenter identification (i.e., H1 is the first hearings commenter) the second numeric code is the comment/response number (i.e., H1-1 is the first hearing comment/response. Comments/responses are shown by resource and/or resource use in the same order they were presented in the draft. BLM responses explain why a particular item is or is not addressed, clarification is or is not needed, whether or not a change in text is made, or give applicable reference to the reader. The responses must be read in conjunction with the comments just above that response. In some cases a paraphased comment will be used when multiple commenters had basically the same comment.

AIR QUALITY

Comments 114-6 and 153-1

Any activities that would impact the monument's Class I Air Quality status should be considered in your planning.

Response

As described on page 2-5 and shown on Map 2-2, the designated wilderness area portion of Great Sand Dunes National Monument has PSD Class I status. The entire national monument is a Colorado Category 1 Area.

Page 3-3 states "Additional (Air Quality) management activities include monitoring, analysis, and impact mitigation on a project-specific basis, which ensures compliance with applicable regulations and implementation plans." This includes impact analysis for projects affecting Great Sand Dunes National Monument.

SOILS

Comment 91-3

The plan inadequately protects other sensitive areas from the affects of oil and gas development. The plan does not include protective stipulations for fragile soil and steep slope areas. Almost every other RMP in Colorado has provided protection for these sensitive areas that cannot withstand the onslaught of unmitigated development.

Response

Although seven soil series are identified in the draft RMP as being highly susceptible to erosion, none of these soils have characteristics that would preclude oil and gas operation. The standard operating practices and siting latitude provided by the regulations would result in mitigation of potential impacts to a minimum level and would not warrant the inclusion of an NSO stipulation. Also the potential for significant increases in water salinity because of surface disturbance in the San Luis Planning Area was not identified as a problem related to the soils types present.

WATER RESOURCES

Comments 104-1&2,107-12&14,110-1, 118-1&2,119-4&5,122-1&2, and 135-2

The Rio Grande at the State Line has been recorded as a no-flow river. According to the United States Geological Survey Water Data Reports for the Rio Grande Basin, flows near Lobatos, Colorado [a point within the reach of the Rio Grande studied] were zero for extended periods of days in 1950-51, and in 1956. The Rio Grande, below Alamosa, is as far from a free-flowing natural river as exists in the West.

Response

Since there are no impoundments in the river segments under consideration, these segments are interpreted to be "free flowing." There is no intent to "restore" the river to a pre-existing condition. The average 10-year flow from 1980 through 1989 in this stretch of the river is 654 cfs, with the high flow in spring averaging 3,400 cfs. There is an implicit Federal reserved water right in the *Wild and Scenic Rivers Act.* It is the BLM position, however, that flows required to satisfy the Rio Grande Compact are sufficient for the purpose of a wild and scenic river designation. There is no quantified reserved water right for the wild and scenic segment of the Rio Grande River in New Mexico, and BLM sees no need to request one for the proposed segment in Colorado. Pending future designation, BLM may have to quantify needs and file through the State Water Courts.

Comments 104-3,107-4&6,110-3,116-2,118-4,119-1,122-4,128-3&6,135-4

The listed preferred alternative includes the recommendation of wild and scenic river designation for a portion of the Rio Grande near the state line, and with this concept, the establishment of minimum streamflows for recreation and fisheries. The establishment of minimum streamflows would impact the operation of the Closed Basin Project, Platoro Reservoir, or any other future project. The development of

the Closed Basin Project was intended to assist Colorado in meeting its Compact deliveries to Mexico.

Response

The BLM position is that flows required to satisfy the Rio Grande Compact are sufficient for the purpose of a wild and scenic river designation. There is no quantified reserved water right for the wild and scenic segment of the Rio Grande River in New Mexico, and we see no need to request one for the proposed segment in Colorado. There is, however, an implicit Federal reserved water right in the W&SR Act. Section 13e of the Act prohibits any modification of the Rio Grande Compact. Operations of the Closed Basin Project also would not be affected.

Comments 107-1,110-2,118-3,122-3, and 135-3

The Rio Grande and Conejos Rivers and their tributaries are grossly over-appropriated streams. With rare exception, many of the water rights in our valley go unsatisfied during much of the year because of the lack of physical supply.

Response

The average 10-year flow in this stretch of the river is 654 cfs, with the high flow in spring reaching into the 3,400-cfs level. It is the BLM position that flows required to satisfy the Rio Grande Compact are sufficient for the purpose of a wild and scenic river designation. There is an implicit Federal reserved water right in the Act, however, there is no quantified reserved water right for the wild and scenic segment of the Rio Grande in New Mexico, and BLM sees no need to request one for the proposed segment in Colorado. Pending future designation, BLM may have to quantify needs and file through the State Water Court.

Comment 107-2

During almost every year and in a majority of the months of any year, an enormous percentage of the water flowing in the Rio Grande below Alamosa results from return flows and inflows into the river below the last diversion at the New Ditch. As a result, the water which is flowing in the river from just below Alamosa to the state line is water which has been previously placed to beneficial use.

Response

BLM agrees with these facts.

Comments 107-5,119-7,and 128-2

Page 3-4, "It is the policy of BLM to protect, maintain, restore and/or enhance the quality of waters on public lands." Depending on what is meant by this statement, it might very well impact the administration of water rights, the Rio Grande Compact, and the operation of the Closed Basin Project. Any attempt to change the current processes and administration would have to be done in cooperation with all affected agencies and users.

Response

BLM foresees no need for water quality improvement in the lower Rio Grande River. The river is currently classified for "recreation class I" and "aquatic life class I," and the existing quality meets the standards for these classifications.

BLM has no intention of condemning any private property or easement for any reason. There is no reason to change the current operations and administration of the river. Any additional properties or easements acquired will be through normal acquisition methods from willing sellers.

Comment 107-9

On page E-4 of the Appendix, there is a statement that the reach is free-flowing with high water quality; yet, at other points in the Appendix and the report, particularly page 3-3 of the basic management plan, the agency acknowledges that there is insufficient data, in its opinion, to determine what the water quality and flows are and that further study is required. These statements are inconsistent and further indication of the inadequacy of the Environmental Impact Statement/Rio Grande Study Report.

Response

Your points are well taken; the fourth full paragraph (page 3-3) has been changed to read "In the event that reaches of the lower Rio Grande River are designated for special management under the *National Wild and Scenic Rivers Act,* no Federal claims for instream flows are anticipated; however, there is an implicit Federal reserved water right in the Act. Existing stream conditions are sufficient to satisfy the needs of any special management designations." The river is currently classified for water quality "recreation class I" and "aquatic life class I," and the existing quality meets the standards for these classifications. The Rio Grande River Study Report has also been rewritten and is in Appendix A of this document.

Comments 107-18&19,119-6, and H18-7

You have no legal basis for making such demand and, to do so runs counter to the express directions of the United States Congress. You ought to recognize the irony of recommending a river for wild status and, at the same time, in the same document, recommending operation of a water salvage project to produce flows for the "wild" river.

Response

We agree and have withdrawn any recommendation for use of Closed Basin Project water to maintain minimum stream flows.

Paragraph 5 referring to the operation of the Closed Basin canal for minimum stream flows (page 3-3) has been deleted and the following substituted:

"In the event that reaches of the lower Rio Grande River are desingated for special management under the *National Wild and Scenic Rivers Act*, no Federal claims for instream flows are anticipated, however, there is an implicit Federal reserved water right in the Act. Existing stream conditions are sufficient to satisfy the needs of any special management designations. Pending future designation, BLM may have to quantify needs and file through the Colorado State Water Court. The river is currently classified for water quality "recreation class I" and "aquatic life class I," and the existing quality meets the standards for these classifications."

Comment 107-20

The last two ditches on the Rio Grande which control all of the flow in the river during many months of the year are the Chicago Ditch and the New Ditch. These ditches are owned by the United States Fish and Wildlife Service and are used to irrigate the Alamosa National Wildlife Refuge. But for these two ditches, there would be a substantial minimum streamflow in the Rio Grande for a greater period of time than currently exists. There is no discussion in any of your documents concerning your relationship with your sister federal agency and the very serious and significant impact its operations have on the flows of the Rio Grande below its headgates.

Response

Although it is not discussed in the draft RMP/EIS, BLM maintains a close working relationship with U.S. Fish and Wildlife Service. We are not concerned with the effect of the Alamosa Refuge operations on minimum streamflows, since it is the position of BLM that existing stream flows are sufficient to satisfy the needs of a wild and scenic river designation.

Comment 107-21

Finally, the Bureau of Land Management has a Congressionally authorized interest in the Closed Basin Project under Priority No. 2 of Pub.L. 92-514. Most certainly, your agency should feel free to undertake the steps necessary to transfer your interest in the Closed Basin Project production under Priority No. 2 from the Blanca Habitat Area to the Rio Grande as a flow enhancement mechanism, if that is your wish, and we would certainly work with you in that endeavor.

Response

We agree and have withdrawn any recommendation for use of Closed Basin Project water to maintain minimum stream flows.

We appreciate your offer. Since our position is that existing stream conditions on the Rio Grande are sufficient for wild and scenic river designation, we see no need to transfer water from the Blanca WHA at this time.

Comments 107-23,128-4&5, and 145-7

It completely disregards your agencies obligation to acquire water rights for those wetlands under Colorado state law, to obtain replacement water for injury caused by these new depletions, and to identify the mechanism for accomplishing that replacement.

Response

We are fully involved with the water court, the Colorado State Engineer, and local water users in order to obtain water rights for the Blanca Wildlife Habitat Area. Development of the Emperius tract will have to wait until water rights accruing to that tract are evaluated, and needed changes for beneficial use are approved by the court.

Comments 114-7 and 153-2

While your RMP does not call for major water developments, we want you to be aware that major changes in the water table could have a drastic effect on the dunes, both inside the national monument and those dune areas outside the Monument on BLM lands.

Response

We are aware that some studies are being done to examine the effect of lowered water tables on the dunes. BLM has no plans, however, that would change the water table in the valley.

Comment 128-1

We note, with interest and some concern, portions of the draft RMP/EIS that would directly conflict with existing water resource practice dictated by state and federal legislation. Specifically, the following comments are offered for your consideration. 1. Page 3-3 contains the following language, "Legal rights would be acquired to use water in support of BLM programs. ." We assume the water court process will be followed.

Response

This assumption is correct.

Comment 146-2

We must consider the "dewatering" of the Rio Grande per operation of the Rio Grande Compact since 1986 a most serious national concern.

Response

BLM has no role in the operation of the Rio Grande Compact. Your concern should be brought before various Rio Grande water users groups, Colorado State Engineer, water conservancy boards, and Bureau of Reclamation (Closed Basin Project).

Comment H18-5

You need to address within your document how you intend to interface with your fellow agency, the Department of Interior, that controls the source of water coming through Alamosa into the rest of the river reach.

Response

BLM has had a very productive and sound working relationship with both of our fellow Department of Interior agencies within the San Luis Valley (Bureau Of Reclamation and U.S. Fish and Wildlife Service). The water involved in the Closed Basin Project is owned and controlled by the water users within the basin. The BOR acts as an operative agent in moving water within the scope of the project. The U.S. Fish and Wildlife Service and the Bureau of Land Management have some of the 16,000+ adjudicated or decreed water rights within the San Luis Valley. Based on the decisions within this plan, this working relationship with the other Federal agencies and the other water users within the valley will continue.

MINERALS MANAGEMENT

Comments 4-1,5-1,7-2,9-2,12-2,13-2,19-2, 20-2,22-1,23-2,24-1,29-3,30-2,31-1,32-1, 42-4,43-3,44-2,45-1,47-1,48-1,52-1,56-1, 58-2,59-3,67-4,70-2,72-2,74-1,75-2,76-1, 77-2,78-2,79-2,81-1,83-2,84-2,85-2,86-2, 87-1,89-1,91-28,94-2,96-2,98-2,99-2,100-2, 101-1,125-1,H24-1,H26-2,H27-1,H28-1,H30-1, H32-1,H33-2,H34-2, and H34-3

I would like to insist the BLM prohibit any and all mineral leasing, mineral entry, and off-road vehicles (ORV) use within the ACECs.

Response

An area of critical environmental concern (ACEC) is a land use designation established for the purpose of providing management emphasis to special resource values within specific areas of the planning unit. The management objectives for such areas are developed through the planning process and further quantified through the preparation of a coordinated resource management activity plan (CRMAP). The designation of an area as an ACEC is not intended to create a defacto withdrawal or wilderness area.

It is not BLM policy to prohibit or unnecessarily restrict one resource or use to meet other resource objectives. The analysis of mineral activities within the planning area and specifically within the ACECs did not identify the need to prohibit mineral development, but rather a need to mitigate certain actions on a resource-specific basis such as imposition of leasing stipulations or mine plan approval requirements. The imposition of these requirements is based on the need to mitigate anticipated impacts to specific resource values. These requirements are not imposed simply because an area is designated as an ACEC.

Comment 10-1

The RMP/EIS is comprehensive, well organized, and minerals are adequately discussed. However, a few suggestions may be helpful. Geothermal springs and wells (table 2-6, p. 2-12) and 2,242 acres geothermal lease (p. 2-9) should be shown on leasable minerals-geothermal map 2-3b. Mining districts and mineralized areas (table 2-7, p. 2-12) should be shown on locatable minerals map 2-4 since township/range locators are not shown.

Response

The recommended inclusion of geothermal wells/springs and mining districts/ mineralized areas on the appropriate

maps has been completed. It is our opinion, however, that the presentation of geothermal and/or oil and gas leases and mining claims within the draft RMP would serve no long-range resource purpose because of the potential for rapid change in these instruments. The presentation of resource potential, however, identifies areas of probability for the presence or absence of leases and/or mining claims over the long term.

Comments 91-1 and H-26-1

The plan did not do an adequate job of analyzing what cumulative impacts could occur within the resource area. There needs to be more analysis of potential development in areas, regarding the cumulative impacts of oil and gas leases.

Response

The cumulative impacts of fluid minerals operations in relation to the reasonably foreseeable development for this area are adequately addressed within the draft RMP/EIS and are supported by a more comprehensive analysis within the San Luis Oil and Gas/Geothermal Technical Report. As stated on page 1-10 of the draft RMP/EIS, this Technical Report is available for public review.

Comment 91-2

Perennial streams, lakes and riparian areas should also be protected from mineral leasing and development. Although page 4-28 states:

As a matter of policy, fluid mineral operations could not be allowed within the 3,230 acres of riparian resources unless such activity could be fully mitigated to the satisfaction of the authorized officer.

This is insufficient. Since a lease is a legally binding contract, this restriction must be put on the lease, or an operator can challenge the validity of such a policy. Riparian and aquatic areas should be closed to oil and gas development. If an operator desires to drill in a riparian or aquatic area then a plan amendment with full NEPA documentation should be prepared rather than allowing the authorized officer to approve such an action with no NEPA compliance.

Response

The use of a policy to exclude fluid mineral operations within riparian areas, which by definition includes permanent waters, is enforceable and in our opinion more than adequate for the protection of these resources within the San Luis Planning Area. Riparian areas and perennial streams shall be avoided by moving the operation. The lease itself, as identified in Section 6, and the regulations under 43 CFR 3101.1-2 provide more than sufficient justification and authority to invoke the identified policy. NEPA analysis will be required to determine mitigation requirements.

Comment 91-5

The model stipulations located in Appendix B have some disturbing aspects. These stipulations may be waived by the authorized officer, but the plan waiver clause never mentions the need for NEPA compliance or public notification for input regarding stipulation waivers. An oil and gas operator should be made aware in the lease that waivers can only occur with public input and environmental analysis, and that a waiver is not left solely to the discretion of the authorized officer.

Response

The Federal Onshore Oil and Gas Leasing Reform Act of 1987 provides that no oil and gas operations may be approved by the authorized officer without providing a minimum of 30 days notification to the public and the completion of necessary analysis for the proposal. It further requires that any substantial modification of lease terms shall necessitate the posting of such modifications for a period of not less than 30 days prior to approving the operations under such modification. Because these notification and analysis requirements are mandated by law, we believe it unnecessary to restate them within the leasing stipulations, now in Appendix C.

Comment 91-7

The BLM fails to make any determination on whether lands are suitable for oil and gas leasing. All lands that are legally available for leasing are open to leasing. Many of these lands are not suitable for oil and gas development and thus should not be leased.

Response

The suitability or unsuitability of public lands for fluid mineral leasing was one of the principal issues identified for analysis by the SLRMP. We are confident we met this responsibility through the analysis we conducted and, based on this analysis, it was determined that no discretionary closures to fluid leasing were necessary.

Comment 91-8

BLM has also left many sensitive areas opened to mineral entry and sale. None of the characteristics that the BLM is trying to protect in the ACECs are either compatible with mineral entry or sale. Why then has the BLM left many of

these areas open to the possible development of a hardrock or aggregate rock mines?

Response

The Bureau is mandated by law to manage BLM-administered lands under a multiple use mission, which provides for mineral uses identified above. These uses will comply with ACEC management objectives to the extent provided by the regulations and direction identified in the RMP. Implementation of locatable mineral activities can only be conducted after submission and approval of a plan of operations including bonding under the 3809 regulations. The Bureau believes this will ensure the protection of the special resources within these areas.

Comment 91-10

The most any alternative looks at closing to mineral entry is a scant 3% of the Resource Area. Alternatives vary from 1% to 3%, or in other words, basically no difference. With regards to mineral disposal, the most any alternative closes is just 16% of the Resource Area under the Natural Resource Enhancement Alternative. Alternatives vary from 1% to 16%. Once again the difference in alternatives is negligible.

Response

The alternatives addressed a variety of closures to mineral entry and mineral material disposal based on the necessity of such actions to protect different resource values. The necessity for a complete prohibition of these activities was only identified within the various ranges you indicate primarily because of the numerous requirements imposed on these activities by Federal, state, and local governments and, in the case of mineral materials, our discretionary authority whether or not to make mineral materials available.

Comment 91-27

The Blanca ACEC contains significant wetland resources. The area is heavily used by waterfowl as well as recreational users. The BLM, however, has only placed seasonal restrictions on oil and gas development and leaves the area opened to mineral sales. These uses are not compatible with the protection of the outstanding wildlife habitat found in this area.

Response

The Bureau is mandated by law to administer the public lands under a multiple use mission, which was our objective in identifying leasing and mineral material mitigation in this area. The use of a timing limitation stipulation for waterfowl nesting was identified as being adequate for the protection of this resource value. The standard operating procedures for fluid mineral operations will provide for limiting impacts to recreational uses by use of screening and noise reduction techniques if necessary. The use of any mineral material resources will be conducted in conformance with the management objective for the ACEC and can, if managed correctly, be a source for additional ponds within the area.

Comment 91-29

The Trickle Mountain ACEC is one of the most outstanding wildlife areas in the entire state. Trickle Mountain is home to Colorado's four major big game species. The BLM will permit oil and gas development in this area with only seasonal restrictions, mineral entry, and mineral sales.

Response

The Bureau is mandated by law to manage BLM-administered lands under a multiple use mission, which was our objective in establishing leasing, and mining limitations within this ACEC. The mitigative measures for protection of wildlife from fluid operations include an NSO for bighorn sheep lambing areas and a timing limitation for big game winter range. Utilization of mineral materials is a discretionary action and will only be accomplished in accordance with the management objectives of the ACEC. Implementation of locatable mineral activities can only be conducted after submission and approval of a plan of operations including bonding under the 3809 regulations. Our analysis as indicated in the draft RMP concluded that the use of these mitigative measures will provide reasonable and implementable objectives for the wildlife resources as well as ensure the multiple use nature of the area.

Chapters 3 and 4 of the draft RMP describe the mitigation of these activities that will ensure the outstanding wildlife values attributed to this area will continue at a level compatible with the Colorado Division of Wildlife strategic plan for this area.

Comment 91-30

The Cumbres and Toltec Railroad ACEC has been designated to protect the viewshed of this historic railroad corridor. The plan leaves this area open to mineral leasing, mineral entry, and utility corridor construction. None of these activities are compatible with maintaining the historical and scenic integrity of the Cumbres and Toltec Railroad

Corridor. Mines, oil wells and powerlines would mar the scenery that the ACEC is trying to protect.

Response

Please see responses to 91-8 and Realty and Lands comment 91-30 and the other comments with similar concerns. This ACEC is open to mineral entry and leasing for fluid minerals with a no surface occupancy stipulation. It is excluded from major utility construction. The proposed RMP requires strict adherence to visual resource objectives for management in this ACEC.

Comment 123-3

Second, we strongly recommend that a map be included in the final planning documents and Record of Decision which displays where the various lease stipulations will be applied. We are aware that the planning documents contain maps showing the location of the resources found in the San Luis Resource Area, but it is not clearly indicated where stipulations will be utilized. Such information is extremely useful to companies when they are considering future activities in the area. Members of the public would undoubtedly also find this information useful, and it would likely help reduce the public's confusion when activities are proposed on a lease in the future. A page-sized map would serve the purpose of disclosing this important information.

Response

The map requested is currently within the draft RMP on page 3-29. In order to make this map more readily accessible to members of the public, a larger full color map has been placed in the map envelope in the back of this document. Please bear in mind that the map only represents current information, which will change, and is not a reliable source of locations for applicable stipulations.

PALEONTOLOGICAL RESOURCES

Comments 91-14,145-3, and H26-8

Some support and some opposition to the proposal to establish a public education/interpretive area at the Clayton Cone site were expressed during the review of the draft RMP/EIS.

Response

Some interest in the Clayton Cone site was expressed by educational institutions and other interest groups. A site-specific cultural resource management plan (CRMP) will be prepared for the site prior to opening the site to these institutions and groups. This activity plan will determine the specific prescriptions for interpretive collection, site management, etc. Please keep in mind that at the present time, nonvertebrate fossils are not afforded protection under specific regulations. Negotiated rule making is currently underway, which will provide guidelines for the disposition and protection of all fossil resources managed by BLM. Of course, no resources may be impacted without a complete assessment of effect.

VEGETATION

Comments 15-8 and H19-1

BLANCA CHAINING REHABILITATION: I have studied both the North and South Chained Areas and recommend that no action be taken in either of these two tracts. Pinyons are re-establishing themselves naturally, especially on the North Chaining, and the scars from these operations probably will not be obvious in another 20 years. It would be a waste of time, effort, and money to do rehabilitation work there.

Response

Piñon pine re-establishment rates in chained areas are variable, depending on such things as grazing impacts by livestock and wildlife, and site productivity characteristics. It takes from 75 to 200 years for mature piñon-juniper stands to develop, and 300 years plus for climax communities to evolve.

At present the crown canopy closures are from 0 to 10 percent; however, over several decades 40 to 70 percent may occur, as is present in the adjacent stands.

The color and texture appearance of the chained areas will improve or soften gradually with time, but the lines and form will be visible for at least 75 to 100 years because of the slow growth rates of piñon. The planned rehabilitation, therefore, will be accomplished.

Rehab will be done in conjunction with timber and firewood harvest sales, which will provide benefits of fuelwood and Christmas trees for local residents.

RIPARIAN RESOURCES MANAGEMENT

Comments 14-3,H24-2, and H25-3

No increase in livestock on these BLM lands should be planned until protection and repair of delicate riparian communities is thoroughly planned and implemented and

proven. I commend your plans for range improvement, and suggest that additional forage be granted to wildlife until damaged riparian regions have been fully repaired.

Response

Approximately 70 percent of the riparian areas associated with perennial streams on BLM land in the San Luis Resource Area are in good to excellent condition. Most of these streams are within allotment management plans and are currently grazed by livestock. Of the 30 percent in poor to fair condition, about 70 to 75 percent is located on the Rio Grande River. BLM administers approximately 21 miles of river bank on both sides of the river up to the high-water line. The east side above the high-water line is private and cattle graze year-long. Since there is no fence on the east side, cattle frequently move across the river and graze the BLM riparian zone. We are now in the process of controlling livestock use on the river and have negotiated an agreement to allow us to fence a portion of the east side.

The other areas in poor or fair condition, such as Ford Creek, Fisher Creek, Raspberry Creek, and La Garita Creek, are currently being managed to improve the riparian condition by using different grazing strategies combined with management tools, including rest. The solution is not to fence out riparian zones, but control the time that these areas are exposed to livestock.

Regarding granting additional forage to wildlife, it must be assumed that this forage will be grazed. Whether it is grazed by wildlife or livestock, the effects will be the same. As mentioned above, timing (both season of use and length of grazing period) is the critical factor, and we have much more capability to control the timing of livestock than wildlife. We are using rest, however, as a management tool and have seen some great improvement.

Comments 40-2

I am concerned about grazing impacts on riparian and wildlife and the BLM's proposed increase in AUMs. Before AUMs are increased, I would like to see the quality of management increased, in particular in regards to riparian areas. Recent developments in non-point source regulations of the Clean Water Act make it more important that BLM examine its allotment management plans to prevent grazing season-long occupation of riparian zones by livestock. The BLM should examine the BLM's fencing and seasonal use practices used by the Agency in Oregon (vs. Earl McKinney), for use in the RA.

Response

Approximately 70 percent of the riparian areas associated with perennial streams on BLM land in the San Luis Resource Area is in good to excellent condition. Most of these streams are within allotment management plans and are currently grazed by livestock. Of the 30 percent in poor to fair condition, about 70 to 75 percent is located on the Rio Grande River. BLM administers approximately 21 miles of river bank on both sides of the river up to the high-water line. The east side above the high-water line is private and cattle graze year-long. Since there is no fence on the east side, cattle frequently move across the river and graze the BLM riparian zone. We are now in the process of controlling livestock use on the river and have negotiated an agreement to allow us to fence a portion of the east side.

The other areas in poor or fair condition, such as Ford Creek, Fisher Creek, Raspberry Creek, and La Garita Creek are currently being managed to improve the riparian condition by using different grazing strategies combined with management tool , including rest. The solution is not to fence out riparian zones (unless no other management opportunity is possible) but control the time that these areas are exposed to livestock. We recognize that season-long grazing is detrimental to riparian zones and have eliminated this grazing practice on all but a short segment of two streams.

Comment 91-15

Our one concern regarding riparian management is the 1,413 acres of lands identified in the plan with potential riparian habitat. If these lands are found to either possess riparian vegetation or have the potential to become riparian areas, what will the agency do with these areas? The plan does not say. The Final RMP/EIS should address this issue.

Response

Thank you for bringing this matter to our attention. If these areas have riparian values, they will be managed similarly to those riparian zones that are already known. Tools to be used may include rest from grazing, fencing, instream structures, other changes in livestock management, etc. Objectives for these areas will also be included in existing and future management plans. This information has been incorporated into the riparian sections throughout the proposed RMP/final EIS.

Comments 91-20&21 and 125-3

The BLM should examine methods of excluding livestock from riparian areas as well as state that any increases in the number of livestock cannot be to the detriment of wildlife.

Response

BLM has excluded livestock from several riparian areas on a temporary basis (e.g., La Garita Creek, Blanca Wildlife

Habitat Area, Ford Creek, La Jara Creek). Other areas are excluded because of inaccessibility; however, exclusion from livestock grazing is just one of the tools we have available. Other methods include fencing (temporary or permanent), herding, and changing season of use and/or length of grazing period. Approximately 70 percent of our perennial riparian areas are rated in good to excellent condition with a stable or upward trend (see page 2-19 of the draft RMP). Most of the areas in poor or fair condition are currently being managed to improve riparian habitat. Enhancement and protection of 7 miles of riparian habitat along the Rio Grande River are complicated by many factors, but tentative management actions to protect and enhance this have been developed.

Any increased forage production allocated to livestock on a sustained permanent basis will be allowed only after monitoring studies show this could be allowed without affecting the existing uses and long-term ecological base. Nonlivestock uses and needs such as wildlife, riparian, watershed, soil, etc., will receive 60 percent of any increased forage production first, if needed, and livestock would only receive 40 percent of the increase.

Comment 132-2

This alternative provides insufficient riparian protection. Riparian protection is needed for the entire 41 mile segment of the river.

Response

Although it would be ideal to protect this entire segment of the river, BLM administers only two very small tracts in the stretch from Lasauses to the Alamosa Wildlife Refuge. That area from Lasauses south to the New Mexico State line is to be managed to protect and enhance the riparian resource. BLM administers property up to the high-water line on both sides of the river. Because of private ownership on the east bank above the high-water line, this would be a tremendous effort that would take years to complete. Attention should first be focused on that portion that has better management potential and then consider the possibility of continuing upstream.

Comment 138-4

Riparian values should be improved by more intensive management of grazing, including exclusion of cattle from the riparian zone and creation of alternative water source.

Response

Livestock grazing is currently managed more intensively on allotments where riparian areas are in poor or fair condition. Examples of this include La Garita Creek, Ford Creek, the Rio Grande River, San Luis Creek, and several streams on the west-facing slope of the Sangre de Cristo range. Cattle have been excluded on a temporary basis from some of these areas, which is a valuable management tool. Exclusion of livestock, however, is just one of the tools available (e.g., salting practices, alternate water sources, herding, and controlling length of grazing period and season of use) to improve riparian condition. Approximately 70 percent of our perennial riparian is in good to excellent condition under current grazing practices; a substantial improvement in the last 10 to 15 years.

Comment 145-4

We strongly support the proposals for riparian protection and enhancement of damaged areas. We recognize the importance of riparian zones and wetlands to water quality, quantity and flood control.

Response

Thank you for supporting our management of riparian areas. New management strategies are currently in place on several streams, including La Garita Creek, Ford Creek, the Rio Grande River, and several streams on the west-facing slope of the Sangre de Cristo range. Currently, about 70 percent of our perennial riparian is in good to excellent condition, and this will improve as rehabilitation efforts succeed. We have had to rely heavily on volunteer groups to accomplish this work, and your support will certainly help us in this endeavor.

Comments 152-19&23

The Colorado Natural Areas Program supports special protection and enhancement measures for riparian areas. Emphasis should be placed on maintaining and enhancing native riparian species. Consideration of sensitive species (e.g., Cleome multicaulis) should accompany any plans to increase waterfowl production.

Response

Thank you for supporting our management of riparian areas. We are currently trying new management strategies on several streams, including La Garita Creek, Ford Creek, the Rio Grande River, and several streams on the west-facing slope of the Sangre de Cristo range. These strategies emphasize management towards species diversity and complexity rather than managing for individual species. Although individual species are important, a complex plant, animal, and insect population is a better measure of overall health of a management area. Presently, about 70 percent of our perennial riparian is in good to excellent condition, and the percentage will increase as rehabilitation efforts continue.

Some nonnative grass and forb species may be used temporarily to establish ground cover on eroded banks. Long-term goals include a natural return to native vegetation.

Comments H26-4 and H29-2

Riparian areas need to be excluded from leasing as well as perennial streams. If there's municipal watersheds or critical watersheds located in the resource area, we would like to see those removed from the lands available for leasing.

Response

Our most critical riparian area is the Rio Grande River Corridor, which has a no surface occupancy stipulation. There will be seasonal restrictions on most other riparian areas (December 15 to March 31). In all riparian areas, surface use standards will allow BLM resource managers to ensure that operations will not cause pollution to or change the character of riparian resources.

Regarding mineral material sales, there will be no activity in riparian areas. Approximately 1,300 acres will be closed to mineral entry for locatable minerals because of protective measures for other resources (e.g., WSAs, Blanca WHA, Rio Grande River Corridor, including the wild and scenic portion, etc.) BLM managers, however, do have the authority to restrict development in these areas if undue and unnecessary damage will occur.

Comment H26-7

. . . there will be an inventory of an additional 1,413 acres of riparian or of potential riparian lands. If these lands are determined to qualify as riparian, we think that there needs to be provisions in how the Bureau of Land Management plans on improving these areas also.

Response

The BLM will manage these areas under the same conditions as known, inventoried areas.

LIVESTOCK GRAZING MANAGEMENT

Comments 2-2,5-3,7-3,8-2,9-5,12-3,13-3, 18-3,19-3,20-3,22-3,23-3,28-2,29-4,30-3, 31-4,32-3,35-2,37-4,39-3,44-1,45-2,48-2, 49-2,53-3,55-6,59-4,60-4,67-3,70-3,72-3, 73-2,75-3,77-3,78-3,86-3,88-2,94-3,101-3, 82-2,85-3,H21-1,H26-11,H28-2,H32-3, H33-3, H34-4

I'm concerned also with stipulations to increase grazing on BLM lands in this region. I would, quite frankly, prefer to see the additional forage left for wildlife.

Response

The Preferred Alternative specifies that 60 percent of any increased forage production will go to wildlife, riparian, watershed, soils, etc. (nonlivestock uses) if needed to support these uses and to ensure a sound permanent ecological base for them. This will satisfy the projected needs for wildlife habitat and forage identified in the draft RMP.

Range improvements benefit both livestock and wildlife; however, livestock operators in most cases contribute money and labor towards development and maintenance of these projects. Range improvements in most cases do not create increased forage production, but are necessary to implement improved grazing management and designed to improve the ecological base, range condition, other uses, and hopefully forage production. Livestock operators' production costs increase whenever more intensive grazing management is implemented; therefore, we believe that allocating 40 percent of the expected increased forage production is an incentive for the operator to incur these additional expenses and cooperate in developing improved grazing management practices. Any increased forage production allocated to livestock on a sustained permanent basis will only be allowed after monitoring studies show that this will not affect the existing uses and long-term ecological base.

Comment 4-2

Grazing and range improvements: Range improvement is usually a euphemism for sagebrush destruction. Replacement of sagebrush with some more palatable grazing is generally a temporary measure, creating an unstable plant community which collapses in the next dry year because it does not have the deep roots of sagebrush. It also generally costs more than you can recoup from grazing fees. A rancher's short-term gain from more grazing on public lands is not in the land's long-term interest. Leave the balance between wildlife and livestock as it is.

Response

At the present time we have no specific vegetative manipulation project planned. It is stated, however, in the Preferred Alternative that this tool can be used to meet management objectives. This probably will only be used if the objective could not be accomplished using other methods or com-

pleted within the prescribed timeframe without vegetative manipulation.

Any proposed vegetative manipulation projects will take into account the existing ecological base and the effects on this base, the effects on the wildlife habitat, the soil, and expected response of the vegetation. The conversion to a desired plant community in a given area could be beneficial to wildlife and the general health of the ecosystem if it is designed properly and not done on a large scale.

Comments 24-2&3,25-2,43-4,45-1,46-1,47-1, 50-1,52-1,56-2,58-2,61-4,76-1,81-1, 96-3, 98-2, 102-3,106-3,144-3, and H24-2

In all ACEC's, limit or eliminate livestock.

Response

We are directed to manage the BLM-administered land to allow for a variety of legitimate uses (multiple use) and livestock grazing is just one of those uses authorized by the *Federal Land Policy and Management Act*. We will continue to manage the public lands under this concept and will monitor to ensure that there is a balance between the uses without deteriorating the ecological base supporting these uses. No use will be eliminated totally for the exclusive use of another unless monitoring shows that this is necessary.

Comment 34-4

My only suggestion is to use a system similar to Levels of Acceptable Change to maintain the range in an excellent-good condition, this is usually the optimal level for all users.

Response

One of the overall objectives of the RMP is to manage the BLM-administered lands to attain good range condition based on the ecological potential of the site.

Comment 91-17

Intensive grazing management often involves high densities of fencing, water tanks, and other range improvements. It also can involve the frequent rotation of cattle, the use of fertilizers, irrigation or planting of non-native species of grasses. The plan fails to mention which of these techniques would be used and the impacts that these developments would have on other resources.

Response

Appendix D, "Livestock Grazing Management" in the draft RMP/EIS summarizes the types of grazing management systems and treatments that are being used or would be used if needed to meet management objectives. It also lists the types of range improvements that are being used or would be used to facilitate implementation of intensive grazing management as provided in an activity plan such as an allotment management plan (AMP) or coordinated resource management activity plan (CRMAP). As stated in the draft RMP, page 3-5, under "Livestock Grazing Management" grazing management will be based on the 1978 San Luis Grazing Environmental Statement." The specific grazing management program and range improvement needs are identified in the AMPs written for this document. A site-specific environmental assessment will be completed to analyze the effects of any changes made in the existing AMPs or development of specific grazing programs or range improvements in new AMPs or CRMPs. Appendix D has been revised and is included in this document.

Comment 91-18

Basically, the plan needs to come up with a more realistic livestock management scenario for the life of this plan. With the limits of federal budgets, the more or less steady demand for red meat and the adverse impacts associated with an intensive grazing infrastructure, the BLM is not being realistic in its projections.

Response

The projected increased forage production is an estimate based on implementing improved grazing management. The assumption in this plan is that we will continue to get adequate funding to implement the grazing programs. Any increased forage production allocated to livestock on a sustained permanent basis will only be allowed after monitoring studies show that this could be allowed without affecting the existing uses or long-term ecological base.

Comment 91-19

Since the Final San Luis Resource Area Grazing Management EIS came out in the late 1970's how much of the increase predicted has been realized?

Response

Preliminary data from the ecological site inventory (ESI) work completed in the resource area shows an improvement in the range condition. We have only compiled part of the ESI work completed but believe it is representative of the remaining acres. The following is a comparison based on

percentage between the San Luis Resource Area Grazing Management EIS range condition and the present data collected.

Range Condition	Percent EIS Data	Percent ESI Data
Poor Condition (early seral)	38	26
Fair Condition (mid seral)	48	56
Good Condition (late seral)	14	18

No permanent increases have been allocated to livestock at this point, but results of improved management are being realized as shown in the above figures. Temporary increases for livestock use are being allowed based on forage condition. Increases will only be continued on a temporary basis until monitoring studies show that this can be allowed on a long-term basis without affecting the existing other uses or the ecological base.

Comment 145-5

We support the Preferred Alternative. A major benefit to the entire RA would be the implementation of Holistic Resource Management practices on all grazing allotments where feasible, especially common allotments. BLM should develop an education plan to speed and facilitate the transition from former practices to holistic. We recognize the growing economic value of both non-consumptive and consumptive uses of wildlife in the San Luis Valley.

Response

Your comments are appreciated. The resource area has started to apply holistic resource management (HRM) programs on several allotments. We have developed an HRM program with a group of permittees in a common allotment. We coordinated a 2-day course on HRM for this group of permittees, which was well attended.

WILDLIFE AND FISH HABITAT MANAGEMENT

Comment 39-4

Your management is critical to the wildlife, especially during lambing, fawning, calving periods. Set policies about human use during these critical periods before they become a problem.

Response

This will be accomplished through the specific stipulations and objectives for wildlife resources that were presented in the Preferred Alternative (i.e., birthing areas) as well as activity plans for site-specific areas.

Comment 55-5

The AWDI proposed project may destroy the Blanca Wildlife ACEC. BLM must stop the AWDI!

Response

BLM is well aware that American Water Development, Inc. (AWDI) proposal could severely impact the Blanca WHA. On February 24, 1987, on behalf of the BLM, the National Park Service, the U.S. Fish and Wildlife Service, and the U.S. Bureau of Reclamation, the U.S. Department of Justice entered a Statement of Opposition to the Water Court in Water Division 3.

Comment 91-16

The RMP should also separate riverine areas from its lacustrine areas.

Response

Lakes and ponds are separately discussed in the wildlife section, page 2-27, and in Appendix C of the draft RMP/EIS.

Comment 91-28

The Rio Grande Corridor ACEC was designated to protect riparian areas, its recreational opportunities, and outstanding wildlife habitat. The plan permits mineral entry in the northern portion of this unit from Lobatos Bridge to Lasauses. This northern portion of the ACEC is also left open without any restrictions to ORV use. Mining and ORV use are not compatible with the outstanding recreation and wildlife resources found in the northern part of the ACEC. Both of these activities could severely mar the scenic and natural integrity of this area, thus adversely effecting wildlife and recreation. These activities could also affect efforts to restore the Rio Grande's riparian areas to a more natural and productive conditions.

Response

ACEC is a land use designation to "red flag" an area of land with special values that need specific management to maintain or enhance these special values. It is not a closed area,

nor is it a defacto wilderness. OHV use will be allowed in some areas of special concern and not in others. The site-specific CRMAP will determine where, if any, in the special area, OHV limitations will be placed to protect wildlife resources.

Comment 92-1

However, I do think that the March 31 ending date may potentially impact herds during some winters. Extending the exclusion dates to December 15 through April 15 would help prevent problems at a critical time period. Protecting birthing areas will benefit those species identified in the plan.

Response

BLM has some flexibility under various leasing guidelines to extend 15 days on a site-by-site basis if conditions warrant.

Comment 92-2

I noticed that this draft has shied away from discussing thermal and hiding cover in regards to forested lands. I hope this does not reflect management intentions concerning timber harvest and planning. Although this topic is a hard one to get a handle on, it none the less is very important to wildlife populations to plan in order to ensure adequate habitat with good spatial relationships. We would encourage the BLM to attempt to provide for at least some minimum cover requirement guidelines to be developed at some future time.

Response

Pages 3-31 and 4-32 of the draft RMP state both thermal and cover requirements for big game on 4,315 acres of commercial timber areas will be maintained. Requirements would be determined on a site-by-site basis with input from the DOW.

Comment 92-4

Additionally, there is little specific attention for nongame species in the draft plan. The BLM has very important nongame wildlife resources under its care in the valley, the above being just one of the standouts.

Response

Review of the management situation analysis (MSA) by the Division of Wildlife did not indicate an issue concerning nongame management on BLM-administered lands. Most of the nongame species on the DOW sensitive list are in the wetland habitat primary requirement category. This habitat type received special consideration in the draft RMP, which will benefit nongame animals significantly. Threatened and endangered species, which are all nongame, are also adequately covered in the plan.

Comment 105-2

I believe that wildlife protection and the goal of acquiring scenic or protective easements on the east side of the river should be included in the Resource Management Plan.

As the Resource Management Plan shows, excessive and/or untimely recreational use of the Upper Rio Grande Box has created pressures on raptor and waterfowl populations. Regulation of the recreational boating season is necessary to prevent permanent and irreversible damage to the wildlife in the area.

Response

BLM is proposing to acquire lands or interest in lands (i.e., conservation easements) on the east side of the river. This proposal is included in the draft RMP.

The BLM study team believes there is a growing need for uniform management of the river from Lobatos Bridge south through the wild and scenic river segment in New Mexico. Recent wildlife observations indicate there is increased disturbance of nesting waterfowl and predatory birds. It is becoming very apparent that more intensive management of recreational use may be needed to solve these problems. A specialized team will be doing an analysis in 1991, which should help us in future management.

Comment 107-22

However, you provide that you wish to develop an additional 1,805 acres of new wetlands. You do not provide the source of water for this wetland development and that becomes the critical failing in your plan. The record should be abundantly clear that there is no likelihood, under current circumstances, that you can obtain additional wells for wetland development without complete augmentation of the impacts of those wells.

Response

There are several options to acquiring water rights including but not limited to purchase, trades, or development and augmentations. If a water right is necessary for development, BLM would go through proper procedures with the Colorado State Water Court. The question addressed in the plan is whether or not these historic wetlands should be developed.

Comment 123-2

First, we request that BLM clarify and incorporate in the final planning documents the rationale for leasing bighorn sheep lambing range with a strict no surface occupancy requirement. It would seem that a timing limitation would provide adequate protection for this sensitive resource without having to resort to a preclusion of all activity on a year-round basis. There may also be other types of mitigation measures available which would suffice to safeguard the lambing range.

Response

The existing Oil & Gas Umbrella EA #CO-050-SL-82-28 describes in detail the assessment of impacts from oil and gas activities on bighorn sheep lambing areas. "It appears that these small areas are selected or based on topography (escape cover, exposure and the association of nearby feeding and watering areas)." It also appears that the availability or the number of sites may be a limiting factor on the Trickle Mountain Area as with most other bighorn sheep ranges. Bighorns are probably the most sensitive of the big game animals to the types of impacts associated with oil and gas activities. Any of these impacts on critical lambing areas could result in the abandonment of the area. Also, any topographic rearrangement; i.e., roads, leveling for pads, production development, etc., could result in decreased use or abandonment of the lambing area. Appendix C (Fluid Minerals Management) in this document clarifies the NSO stipulation.

Comments 132-4,138-3,147-2, and 148-2

Studies of raptor and waterfowl nesting habitats suggest that recreational floatboating has a disastrous effect on successful population maintenance. Continually increasing recreation use of the Taos Gorge below the Red River confluence has served to push both raptor and wildfowl populations north, into the upper Rio Grande Box Canyon. For this reason, it is of paramount importance that recreation be intensively managed in section C.

Response

We agree, and the following changes in the draft RMP are included in Chapter 4 of the proposed RMP/final EIS:

3-30 - "Recreational use would be managed to maintain and perpetuate existing values in Segments B and C of the Rio Grande River Corridor" will be added after the last sentence in the last paragraph.

3-35 - "...in both the Rio Grande Corridor and the Blanca SRMAs" will be added to the third paragraph.

Appendix A (Rio Grande River Study Report) in this document addresses regulation of recreational use in Segment C of the Rio Grande River Corridor.

Comment 144-5,H28-4

I also would like to suggest that an additional 12.3 miles north of the 8.8 miles already suggested for designation also be included in that recommendation up to the north, to the Lasauses Cemetery, as the raptor population in this area is equal to that found in the birds-of-prey area along the Snake River in Idaho, which seems to be a unique characteristic that would warrant its inclusion.

Response

Our present data base shows all 22 miles have outstandingly remarkable values, and the area is identified as crucial habitat for birds-of-prey. This 22-mile portion has been determined eligible and suitable for wild and scenic designation. Available information is not conclusive to support the contention that raptor population in the lower 8-mile segment does equal or exceed the Snake River Birds-of-Prey Area. A raptor study funded by BLM in 1991 is in progress. The designation of wild and scenic river is based on a number of characteristics of which wildlife populations is only one.

Comment 144-6

To classify the San Luis Resource Area as a dedicated National Natural Preserve with this area classified as a National Critical Habitat area, as well and to guarantee that Old Growth Forest Habitat receive inclusion in a National Old Growth Sanctuary System.

Response

We find no congressional legislation referring to your terms of classifying wildlife habitat. The RMP, according to BLM guidance and policy, identifies and classifies over 342,000 acres as "crucial habitat" for various wildlife species.

Comment 145-6

We support the Prefered Alternative with the additions listed below. We recognize the overall importance of the Blanca WHA (including the Emperius Tract) and its 7,750 acres and the crucial role of the BLM land in the San Luis Valley as winter ranges.

Response

Thank you for your support. We believe the RMP adequately expresses the significance of the Blanca ACEC and the

crucial winter ranges with respect to wildlife and recreation resources in the San Luis Valley.

Comment 145-9

We recommend establishment of management procedures for emergency wildlife/winter range situations allowing temporary situations allowing temporary allocation of domestic animal forage to wildlife beyond the 60/40 formula of the Preferred Alternative. In this way this formula would not be an obstacle in times of imminent wildlife mortality, as we have seen in the recent past.

Response

Imminent wildlife mortality has not been a historical problem on BLM-administered winter range in the San Luis Valley. If and when this occurs, snow depth makes forage unavailable. Increasing unavailable forage will not alleviate the problem. Also, the 60/40 split only applies to new forage produced by implementing the plan.

Comment 146-1

I suggest some appropriate special management treatments for wildlife and fisheries for the Rio Grande above and below Lobatos Bridge all the way to the Alamosa National Wildlife Refuge. The stretch from the New Mexico border to near Lobatos Bridge clearly should be in the National Wild and Scenic River System.

Response

Special management treatments for wildlife are included in the plan. A major example is the riparian management being proposed, also restrictive stipulations on oil and gas, OHV, and recreation. In the proposed resource management plan, the 22 miles of the Rio Grande River immediately north of the New Mexico border has been determined eligible and suitable for inclusion in the National Wild and Scenic River System.

Comments H18-1 and H18-2

There is a suggestion in the report that an additional eighteen hundred and five acres of new wetlands would be developed in these areas, or should be developed in these areas. I want the record to be clear, and I believe that BLM should address the sources of water that are proposed for the development of those wetlands.

Response

There are several options to acquiring water rights including but not limited to purchase, trades, or development and augmentations. If a water right is necessary for development, BLM will go through proper procedures with the Colorado State Water Court. The question addressed in the plan is whether or not these historic wetlands should be developed.

Comment H18-3

There needs to be a recognition in the record that there will have to be augmentation of the stream system of other wetlands environment on these three tracts if they are to be developed at the level you are talking about because there isn't any water out there. It has to come from somewhere, and when you take more water from the system you are going to hurt someone and you need the plan for augmentation, and I would like to see that addressed.

Response

BLM is presently involved in preparing an augmentation plan for these waters.

Comment H34-4

And as far as the 60/40 split, I wanted to address that concern, too. I think it's very commendable that 60 percent of the increase in AUMs is going to wildlife. I think it should be higher though.

Response

The 60/40 split was made to enhance the natural resource values, meet multiple use mandate, and also give the livestock interest an incentive to cooperate in allotment management plans.

FOREST AND WOODLAND MANAGEMENT

Comments 91-22,91-23, and 145-10

The BLM has failed to examine the need to protect old growth forest resource on its lands. The plan needs to include an inventory of old growth acreage and must examine what percentage of this acreage will be left in this condition.

Response

Please refer to the Cañon City Ten-Year Forest and Woodland Management Activity Plan, referenced on page 2-27 in the RMP. This document is available for review in the Cañon

City District Office; it was not included in the appendix because of its length.

As shown on Table 2-19 in the draft RMP, only 5,894 acres (22 percent) of the total acres of commercial forest land (CFL) are used to calculate an allowable harvest level. The remaining 21,150 acres of CFL, or 78 percent of the total, are to be allowed to grow through successional stages as influenced by the lack of fire in most cases, and with little or no control of forest pests. Primarily, only noncommodity uses and benefits will be available on these acres. The stands in this category already offer old growth characteristics and will continue to mature.

It is BLM policy to manage to maintain the desired forest ecosystems. This could require that opportunities to manipulate vegetation in manners that will be advantageous to forest health, wildlife, fisheries, water, recreation, and range be implemented on the forested acres (including riparian areas) that are removed from the allowable harvest base. This means that no planned harvest is scheduled from these acres, but that other types of operations are not necessarily precluded. Operations of this type are expected to be rare, and proper environmental analysis and NEPA compliance will be followed.

LANDS AND REALTY MANAGEMENT

Comments 2-3,4-3,5-2,8-3,9-3,11-2,18-5, 20-4,21-1,22-4,24-2,27-4,29-5,30-4,31-5, 33-3, 34-3,36-4,39-2,40-1,42-3,44-3,47-1,52-2, 55-4,56-3,59-5,66-2,61-3,63-2,67-2,69-3, 70-4,72-4,73-4,76-2,77-4,78-4,79-3,81-3, 82-5,84-3,85-4,86-4,88-3,89-1, 91-25,94-4, 98-3,99-3,100-3,102-2,106-4,125-4,144-4, H6-3,H21-2,H24-4,H26-12, H27-3, H28-3, H29-3,H31-1, and H33-4

No power lines should be allowed within these scenic and natural lands.

Response

The Taos powerline was proposed before the RMP process began. Much public opposition to the proposed route was received, and alternative routes have been proposed. Public Service of Colorado has recently submitted an alternative proposal involving a route on the west side of the Piñon Hills/Flat Top areas and notified BLM that the application for the proposed Taos/San Luis Valley 345 kV line has been withdrawn effective December 11, 1989. A powerline into Colorado from New Mexico could be possible in the future, and it will be treated on a site-specific basis if and when it occurs.

Comment 6-2

We do have one concern in the area, however. That concern is the Mt. Blanca Road, and this we desire to remain open to use and be excluded from the wilderness the U.S.F.S. has proposed. Since the initial mile or so is on BLM land I mention this concern here.

Response

The Mt. Blanca Road, from Highway 150 to the U.S. Forest Service (USFS) trailhead and boundary, is open to public use and will continue to be open for public use on BLM-administered lands. The off-highway vehicle designation for this area in the plan will be limited with seasonal road/trail closures during the wetter spring period to allow for better road/trail maintenance, but may remain open the remainder of the year.

Comments 12-4,13-4, and 14-4

I also protest the plan permitting utility companies to construct the Taos powerline which would run through the Rio Grande Corridor west to Flat Top Mesa and Piñon Hills WSA. All of these areas are to be designated ACECs in the plan, and a powerline would not be compatible with protecting the natural and scenic qualities of these areas.

Response

A major utility in view of the Rio Grande River Corridor would create an unacceptable intrusion into the viewshed. An alternate route similar to that proposed by Public Service of Colorado could allow for utility development in the area, but avoid the Rio Grande River Corridor and the majority of the viewshed of the San Luis Hills ACECs. All ACECs are excluded from major utility corridor location, and utility corridors designated in this plan are located outside the ACECs.Comment 91-24

Comment 91-24

We recommend one change in the proposal for potential acquisition areas. Lands along the west side of the Great Sand Dune National Monument should be included as potential land acquisition sites. The current land ownership within the proposed Sand Castle ACEC and the rest of the western flank of the Great Sand Dunes has high concentrations of Paleo-Indian cultural sites. Currently land ownership in the area is a mix of BLM, state school lands, and private lands. If the BLM could block up ownership in this area, it would better protect these nationally significant cultural resources.

Response

BLM-administered land in the San Luis Lake areas is discussed on page 3-31 of the draft RMP and is designated for disposal only to the National Park Service or the Colorado Division of Parks and Outdoor Recreation. Another possibility would be for this land to remain under BLM administration and negotiate an exchange with the private landowner to block up BLM-administered lands into a more manageable unit. The private landowner has expressed a desire to do this; however, to date, BLM has not received any formal proposal.

Comments 91-26 and 91-30

Los Mogotes, Sand Castle, and the Cumbres and Toltec Railroad Corridor should also be included as utility corridor exception areas. All three of these areas have resources which would be adversely affected, therefore, the integrity of the areas would be compromised with the future construction of utility corridors.

Response

These three areas and all other ACECs are exceptions and are reflected on the large maps in the back of this document. Each area does have special resources or characteristics that should be protected. The Western Regional Corridor Study, which was done by the Western Utility Group, did not propose corridors in any of these areas.

Comment 91-29

The Trickle Mountain ACEC is one of the most outstanding wildlife areas in the entire state. Trickle Mountain is home to Colorado's four major big game species. Utility corridors will also be permitted. The BLM is once again permitting a number of activities which would have substantial adverse impacts on the wildlife habitat that BLM is trying to protect.

Response

Public Service Company of Colorado envisions no utility routes in the Trickle Mountain area because existing lines can handle use by the current residents, and no increase in population of the area is anticipated. If any new utility lines were ever proposed, they would be considered, but all efforts will be made to avoid Trickle Mountain, because of the unique wildlife values. Other alternatives are possible such as following State Highway 114.

Comment 93-3

It is stated that unauthorized dumping appears to be on the increase, primarily because some authorized landfills are inconvenient to use and dumping fees are required on some. Without implementing appropriate mitigation plans, these problems will probably worsen. Consideration should be given to mitigative measures that may help reduce this problem of illegal dumping.

Response

Unauthorized dumping is still occurring on BLM to some extent. BLM is currently working with the local counties as much as possible to clean up old dumpsites and prevent new dumping. No new sanitary landfills are anticipated on BLM although some possibilities are available (i.e., sale or exchange). BLM will continue to reclaim old illegal dumpsites as opportunities develop.

Comments 104-6&7,107-10&11,118-7&8, 122-7&8, and 135-7&8

The Wild and Scenic Rivers Act allows your agency to condemn private land if the river is designated. We strongly resist a designation which would then permit the condemnation of private property.

Response

The *National Wild and Scenic Rivers Act* authorizes BLM to acquire the land in fee simple or to only acquire a scenic easement. Normally BLM acquires interest in private land through negotiation with willing buyers rather than condemnation. Condemnation of private property is not allowed by the Act if more than 50 percent of the land is publicly owned. Our calculations indicate that 36 percent of lands adjacent to the river are publicly owned.

Comments 109-2,115-2,117-2,129-1,133-2, 134-2,147-1, and 148-1

My concern is that wildlife protection, with goals to acquire scenic or protective easements on the east side of the river, be included in the RMP.

Response

Page 3-35 in the draft RMP states that acquisition could be accomplished either by fee title or through easement. Fee title would be the best management option; however, obtaining a conservation or protective easement would be the next best option. When BLM buys a conservation easement from a landowner, it buys the right to control the use of that land and to protect the natural qualities of the area. The scenic easement contains restriction on the future use and development of the land. Wildlife in the area will be considered part of the natural quality and will be protected. Because the quality of wildlife is both pristine and unique,

it will be a high priority determining factor for acquiring a conservation easement.

Comments 114-1 and 153-7

The Resource Management Plan (RMP) fails to adequately address lands other than those administered by the Bureau of Land Management (BLM) within the San Luis Resource Area.

Response

All Federal, state, and county agencies with an interest in the San Luis Planning Area were contacted concerning the draft RMP. Management prescriptions in the BLM planning process, however, only affect BLM-administered land. A planning area for the resource management plan was designated as described on page 1-1 of the draft RMP. Pages 5-5 through 5-7 list all agencies and individuals who participated in the planning effort. The Rio Grande National Forest recently completed a land use plan that covered all national forest lands. Their plan was reviewed for continuity and coordination in areas such as critical big game winter range, utility corridors, etc.

Comments 126-1&3 and 145-13

Public Service Company respectfully requests that you consider this addition in the final Resource Management Plan as a substitute for the original corridor along the Rio Grande River which was approved in the Record of Decision for the San Luis-Taos 345 kv Electric Transmission Line.

Response

The proposal in the Public Service Company comment on the draft RMP appears to be a very viable alternative that would avoid all sensitive areas and still provide a potential powerline west of the San Luis Hills area.

Comment 139-1

I strongly urge that you seriously consider a more intensive RMP than the preferred alternative for the San Luis Resource Area draft RMP. Of particular concern to me and many others is the easy road and poaching access to the east rim. For more background data I refer you to Todd Wilkinson's fine feature article in the Dec. 18, 1989 issue of High Country News. Subject: POACHERS.

Response

At the present time, all the land east of the Rio Grande River above the high-water line is private, but a proposal in the draft RMP is to acquire property by fee title, donation by county, etc., if the opportunity arises. Acquisition by scenic easements is the next best option. Either option will allow BLM to provide some protective measures for the land and wildlife. Total elimination of access, however, is impossible as foot traffic into the area could not be controlled. Public responsibility for protecting this area is the best deterrent; however, this too would not give total protection.

Comment 145-11

We recommend the PA with the addition of the major facility citing stipulations from the NREA. These stipulations seem most sensible in avoiding future resource management conflicts in areas already identified as containing valuable natural resources for which management prescriptions are being made in the RMP.

Response

Efforts will be made to avoid proposed developments in any areas with valuable natural resources. Other viable alternatives are generally available to prevent damage to the resource. If an alternative is not possible, mitigation will be required to alleviate as much adverse impact as possible.

Comment 145-13

We recommend new withdrawals for the Rio Grande ACEC/SRMA (6,016 acres) and Blanca ACEC/WHA (7,750 acres).

Response

On page 4-32, the draft plan states that the expanded withdrawal on the WHA/SRMA would protect all 7,750 acres. The acreage for the ACEC/SRMA has been revised and is now 9,147. Management of the Rio Grande River Corridor as an ACEC (2,640 acres) and SRMA (4,595 acres) is considered the best alternative from a management standpoint because of BLM ownership and/or access to the river along this segment. The existing waterpower/storage withdrawal will be recommended for termination.

Comment 145-14

We recommend exchange or acquisition of the state land section within the San Luis Hills ACEC area, for the purpose of assuring effective future management without conflict, as directed by the RMP.

Response

In April 1989, BLM received a list of state lands suitable for exchange with BLM, which included all state sections,

except one (T. 34 N., R. 11 E., Sec. 16) in the San Luis Hills ACEC. BLM is most willing to proceed with such an exchange, but it is unknown when any action on it will occur.

Comments 150-12 and 152-24

All lands providing habitat for candidate and listed threatened, endangered, and sensitive plant and animal species should be retained in federal ownership. Any proposals to dispose of such lands should be reviewed by DOW, CNAP, and the USFWS.

Response

BLM is required to retain all lands that involve any potential or listed threatened and endangered or sensitive plants or animals. It is possible, however, to exchange lands for land with an equal or greater value or benefit, which would include land with special plants or animals.

Comment H11-6

I would like to state my opposition to the BLM acquiring any further amounts of land within the San Luis Valley.

Response

In the Preferred Alternative, emphasis is given to acquisition of lands with special significance such as special plants and animals, wildlife habitat (especially critical winter habitat), access, cultural values, riparian areas, and recreation areas. These resources are of significant national interest to BLM and the general public. A considerable amount of these resources can be on private land within or adjacent to BLM-administered land. Acquisition of these private parcels through exchange, etc., will allow BLM to enhance, consolidate, and increase its management opportunities. More important, BLM-administration of such resources allows them to be used and enjoyed by the public.

Comment H26-9

I was not able to find in the plan - maybe it was just I missed it - the acquisition areas being identified. I think that two of the areas that are of biggest concern to us are the lands along the Rio Grande and the areas around the Sand Castle area of critical environmental concern, as being acquisition areas. We would like to see both of those areas identified as top priorities for land acquisition.

Response

Map 2-16 Land Tenure Opportunities-Acquisition shows the areas identified for land acquisition. It includes any private lands within the marked areas. Any private land along the Rio Grande River on either side is identified for acquisition.

The Sand Castle area is considered as part of the land base to be managed by BLM. Lands are available for disposal or acquisition on a case-by-case basis if disposal or acquisition serves the national interest. Disposal could occur, by exchange if the action would result in a consolidated land ownership pattern, improved manageability of natural resources, or otherwise be in the public interest consistent with the provisions of section 206 of FLPMA.

WILDERNESS MANAGEMENT

Comment 144-1

To secure the following areas, wild acres, as dedicated wilderness: South Piney Creek 1,100; Black Canyon 2,500; Sand Castle 1,800; Papa Keal 1,210; Zapata Creek 805; San Luis Hills 13,100.

Response

Four wilderness study areas (WSAs), Black Canyon, South Piney Creek, Papa Keal, and Zapata Creek, are contiguous to a USFS WSA, and are included in their study of the Sangre de Cristo range. The USFS has proposed to Congress and the President that these 3,300 acres be designated as wilderness.

The Cañon City District Wilderness Final Environmental Impact Statement was released to the public in December 1987. It recommends that the Sand Castle and San Luis Hills WSAs not be designated wilderness.

The RMP considers other alternatives for protecting the wilderness characteristics identified in these areas that might not be designated as wilderness.

AREAS OF CRITICAL ENVIRONMENTAL CONCERN

Comments 2-1,5-1,7-1,8-1,9-1,11-1,12-1, 13-1,14-1,16-1,18-2,19-1,20-1,22-1,23-1, 26-2,27-2,29-2,30-1,31-2,33-1,34-3,36-3, 37-1,38-2,39-1,41-1,42-2,43-2,49-1,52-3, 55-2,57-1,59-2,60-3,61-1,62-1,66-1,68-2, 69-2,70-1,72-1,73-5,74-2,75-1,76-2,77-1, 78-1,79-1,81-2,82-1,83-1,84-1,85-1,86-1, 88-1,91-32,94-1,96-1,98-1,99-1100-1, 101-2, 102-1,106-1,108-1,140-1,144-2,145-15, 49-2,150-7,152-1,152-5,152-20, 152-26,

H6-1,H24-3,H26-10,H27-2,H29-1,H31-4, and H33-1

Elephant Rocks and Bishop Rock were both recommended for designation as ACECs; Elephant Rocks for the unique geologic formulations and rare plants and Bishop Rock for the petroglyphs in the area.

Response

The proposed Elephant Rocks ACEC was reviewed by the RMP team in light of the 81 draft RMP/EIS public comments questioning BLM application of "relevance" and "importance" criteria in BLM Manual 1613. Based on this review, Elephant Rocks is added as an ACEC in the proposed plan.

The proposed Bishop Rock ACEC was reviewed by the RMP team in light of the 20 draft RMP/EIS public comments questioning BLM application of "relevance" and "importance" criteria in BLM Manual 1613. Based on this review, Bishop Rock was dropped from further ACEC consideration and the decision is documented in the proposed plan. There is some cause for concern in regards to petroglyphs vandalism. A cultural resource management plan (CRMP) will be prepared for this area when the RMP is completed.

Comments 16-3,91-30,103-1, and 106-2

We feel these areas can be adequately protected only by prohibiting all grazing, mineral leasing or entry, ORV use and powerline construction.

Response

ACECs are by definition multiple use areas that provide for management of unique resources within an overall multiple use land management framework. ACECs are not single use and do not carry legal mandates such as wilderness designations. ACECs are administrative designations designed to provide management with a "flag" to indicate that certain areas may require special management. Certain uses may be excluded to protect/enhance special values if it is determined that they need such management.

Comment 17-2

Both the Chama narrow gage railroad corridor (the whole thing) and the Sand Castle archaeological site should be managed as ACECs.

Response

The Cumbres and Toltec Scenic Railroad Corridor and Sand Castle Archaeological site were recommended as ACECs in the draft RMP/EIS. They are also recommended for ACEC designation in the proposed RMP/final EIS. Both of these sites are National Historic Register quality and will be managed as such. These sites have special values outside the boundaries of the designated BLM-administered lands.

Comment 37-6

I have hiked Trickle Mountain, and believe it warrants ACEC protection.

Response

The Trickle Mountain area was recommended to be designated as an ACEC in the draft RMP/EIS Preferred Alternative. The recommendation has not changed in the proposed RMP/final EIS.

Comment 97-1

*Sentence #1: Don Juan de Onate was long gone, departed from this life in 1696! He came with his settlers to the San Juan Indian pueblo of the Espanola Valley in 1598. He explored east to the buffalo plains, explored west to the Gulf of California, but no documents ever show him coming north to the San Luis Valley (altho I've always suspected some of his Colonists may have secretly made trips here while he was gone, exploring east and west instead of minding his colony).

*Sentence #2: A number of well recorded trips were made from Santa Fe to SLV during the 17th & 18th centuries, most outstanding Don Diego de Vargas, 1694, and Don Bautista de Anza, 1779. And in 1807, the hundred dragoons sent to the Conejos from Santa Fe to apprehend Liet. Zebulon Pike. There were others, not as well known, but recorded, and some not recorded but thought possible.

*A first settlement was made in 1833 before "the 1840s" on the Conejos, and previous visits by trappers, traders, and early sheep camps in the San Luis Valley county areas today called Costilla and Conejos Counties

Response

You are correct. Don Diego de Vargas explored the San Luis Valley in 1696. Your notation about a settlement on the Conejos River is also correct. These corrections have been noted.

Comments 111-1,140-2,147-1,150-10, and 152-16,21,25&28

It is incumbent upon the Resource Area to provide management plans that will improve the security of candidate and state sensitive plant species. Our greatest concern with the Draft RMP is that this has not been done for Astragalus ripleyi. Having previously nominated Ra Jadero Canyon as an ACEC for the protection of A. ripleyi, we cannot understand or accept the Draft RMP's omission of designation for this site. As noted above, A. ripleyi will be an official Candidate species by the time this RMP is finalized. Thus, there can be no question as to the "importance" and "relevance" criteria being met. This candidate plant species requires special management to prevent its subsequent listing as threatened and endangered.

Response

The proposed Ra Jadero Canyon ACEC was reviewed and re-analyzed in light of new information from public comments on the draft RMP/EIS and does appear to meet both relevancy and importance criteria. The site is designated in this proposed RMP/final EIS as an ACEC.

Comment 114-2

One existing and six potential National Natural Landmarks (NNL's) are also not identified in the plan. Both GRSA and these existing or potential NNL's should be described in the "Affected Environment" section of the Draft Environmental Impact Statement (DEIS) and included in pertinent maps. Details on the existing and potential NNL's within the resource area are included as an attachment to this memorandum

Response

The only existing NNL of which we are aware is the Wheeler Geologic Area and it is managed by the U.S. Forest Service. BLM management would not affect this area. We are unaware of any other NNLs, either proposed or designated, on or near BLM-administered lands in the San Luis Valley; therefore, the other identified sites would not be affected by this plan.

Comment 127-9

Second, the report states that the 41.5 miles of the river study area have been identified as a potential ACEC and as possessing some special cultural characteristics. RMP, Appendix E at E-1. It would be helpful to identify which particular resource values were identified in relation to the ACEC designation. The Final RMP should identify with particularity those outstandingly remarkable values present in each identified river or river segment.

Response

The study report has been extensively revised and is Appendix A in this proposed RMP/final EIS.

Comments 132-7,137-2,138-5, and 145-16

We further recommend that the entire reach studied be included in a proposed National Conservation Area which would focus on the Rio Grande and surrounding wildlife habitat. The NCA would contain a variety of special designations such as ACEC, Scenic, and Wild and Scenic. An NCA proposal takes into account the critical situation of the raptor and wildfowl populations, which are receiving increased pressure from both recreation use and poaching. An NCA may require additional budgeting for education/enforcements, but increased prominence of this unique area as a premiere raptor area will open new avenues of funding resources.

Response

We will work with the Taos RA if their NCA proposal ever becomes a reality; we will take the necessary action at that time. The proposed RMP/final EIS reflects our belief that NCA management may be very appropriate and viable management if tied to a New Mexico NCA. The Colorado portion would complement a similar proposal being considered in New Mexico. Conceptually we will combine the Flat Top Area, the San Luis Hills, the Piñon Hills, the entire river corridor up to Lasauses Cemetery, along with the New Mexico proposed NCA, into a new larger proposal and will keep the wild and scenic river idea. We have added language in the proposed RMP/final EIS saying that it is desirable to have this congressional designation to protect those combined resources in this area.

Comment 145-8

We recommend a Blanca ACEC be established.

Response

Blanca is already a wildlife habitat area (WHA) and a special recreation management area (SRMA). In light of public comments, Recreation 2000 goals, and Wildlife 2000 goals, the Blanca WHA will be designated an ACEC in the Proposed RMP/final EIS.

Comments 150-3 and 152-13

The discussion of Areas of Special Concern under "Management Guidance Common to All Alternatives" (P-3.7) in the Draft RMP discusses only the Rio Grande river corridor. We fail to understand why this section does not include discussion of all the areas, throughout the Resource Area, that contain sensitive resources and that are proposed for special management. The section as it stands gives the mistaken impression that no sensitive resources exist other than in the river corridor.

Response

The draft RMP/EIS, Chapter 3, section on "Management Guidance Common to All Alternatives" includes discussions of many sensitive resources; i.e., Air Quality, Soils, Water Resources, Geology, Vegetation, Wildlife and Fish Habitat, Wilderness, Historical, and Special Status Plant and Animals Value. The purpose of this section is to present common management throughout the resource area that would not vary in the alternatives.

Comment 150-9

In connection with this point, we wish to comment that logic provides that if a site meets the ACEC importance and relevancy criteria under any alternative, it must meet them under all alternatives; according to BLM policy, such a site should be designated under all alternatives.

Response

We are not aware of any BLM policy that states if a site meets one of the four ACEC relevancy criteria or meets one of the five ACEC importance criteria it must be designated under all RMP alternatives. In fact, BLM NEPA guidance suggests that failure to look at both sides of the issue here would inadequately present analysis of impacts of designation and nondesignation.

Comment 150-11

Incidentally, we see no justification for the separation (Tables H-2 and H-3 and related text through the document) of areas originally proposed for ACEC consideration and sites subsequently proposed. A preliminary draft should be just that -- a working document designed to elicit further ideas and information. Why segregate that information and treat those proposals differently, once you get them?

Response

The additional sites and additional information discussed in Table H-3 of the draft RMP/EIS were received almost a year into the planning process and were, therefore, treated, analyzed, and re-analyzed separately. This was explained on page H-1 of the draft.

Comment 152-6

CNAP did not recommend for special status the following areas:

Grande Mogote Mesa

Little Mogote Mesa

South Pinon Hills

Pinon Hills

These areas may be worthy of special management area designations, but the recommendation did not originate with CNAP.

Response

The CNAP/CNPS plant inventory shows sensitive plants and plant communities at these locations. This information was part of the rationale for looking at these areas for potential ACEC designation (i.e., Los Mogotes Area and San Luis Hills Area).

Comment 152-7

The plan is unclear in its references to South Pinon Hills, Pinon Hills, and San Luis Hills. The relationship of these areas to each other should be clarified to facilitate public comment on the draft plan.

Response

These areas, consisting of various groups of hills, are commonly grouped and called three different names (South Piñon Hills, Piñon Hills, and Flat Top Mountain). As a whole, they are also commonly referred to as the San Luis Hills. The ACEC designation called San Luis Hills includes portions of the two most northern groups (Piñon Hills and Flat Top Mountain).

Comment 152-27

Los Mogotes contains a small population of Astragalus ripleyi. The plant should be considered in all planning and management activities related to the area. Management

emphasis on game species (critical winter range, etc.) on Los Mogotes conflicts with management necessary to preserve A. ripleyi. Therefore, Los Mogotes cannot be considered a viable preserve for Astragalus ripleyi. Another site must be chosen to provide for preservation and enhancement of A. ripleyi habitat and to prevent the need for listing of the plant under the terms of Endangered Species Act.

Response

We recognize that the population of *A. ripleyi* in Los Mogotes is not necessarily the best example in the area. There are, however, other values such as wildlife habitat that make this area suitable for an ACEC designation. We appreciate that CNAP does not consider the Mogotes population as "viable" for a preserve.

Comment 152-29

Elephant Rocks is presented as a designated ACEC in the preferred alternative in Table H-4, but is not included as a designated ACEC in the preferred alternative text in the body of the report (v. page 3-32). This inconsistency should be resolved.

Response

This table is in error; Elephant Rocks should not have been included in the fifth column. After public comments and reanalysis, however, Elephant Rocks Area is a designated ACEC in this proposed RMP/final EIS.

RECREATION MANAGEMENT

Comment 91-34

We question why no areas have been given a Class I Visual Resource Management designation. We recommend three areas be given this designation.

1) The area around the Great Sand Dunes National Monument deserves this designation. Great Sand Dunes is a resource of national significance and in order to protect the viewshed seen from the monument, the BLM should designate its lands under a Class I designation.

2) All the lands in and around the areas recommended for inclusion into the Sangre de Cristo (proposed) Wilderness should also receive this designation because of the need to protect this nationally significant area.

3) Finally, the lands located in the Rio Grande Corridor and San Luis Hills ACECs should receive the Class I designation because of significance of this site to recreation and protection of natural environments within the valley.

Response

Class I applies only to classified special areas such as wilderness areas, natural areas, and wild and scenic river corridors. This quality standard is established through legislation or policy. The scenic quality of the BLM lands surrounding the significant areas identified in your comment are considered to be fairly common to this physiographic region. The combined importance of scenic quality, visibility, and visual sensitivity, however, are considered to be high enough to warrant management of the surrounding areas as Class II.

The management objectives for Class II lands are very restrictive. Changes in any of the basic elements caused by a management activity should not be evident in the characteristic landscape.

Comment 93-1

While this Plan/EIS indicates that "intensive recreation management" would maintain recreation opportunities, it does not specifically address potential impacts on the environment or health and safety. General topics of concern include garbage collection and disposal, rest room facilities, and safe drinking water. What facilities are planned, or, if the area is to remain in a primitive setting, what guidance will be given to recreationist regarding these environmental health concerns.

Response

In back-country areas where developed facilities are absent, users will be instructed through methods such as brochures, signing, ongoing public awareness programs, and/or special recreation permit guidelines to pack out all litter and refuse, bury human waste at least 150 feet from any water bodies, and treat any natural water sources prior to drinking.

In future high use, developed recreation sites, facility design will be part of site-specific activity plans and environmental assessments, which will be prepared prior to site construction. Contracts with local businesses for garbage collection and removal, and vault toilet pumping are normal procedures. Drinking water sources from developed springs and wells are routinely tested by various labs and state health agencies. If test results are below state standards, the source will be treated or use will be discontinued.

Comments 95-2,109-3,112-2,115-3,117-3, 129-3,132-5,133-3,134-3,137-1,141-1 and 143-2

As noted in the RMP, excessive or untimely recreational use on the Upper Rio Grande Box has created pressures on the raptor and water fowl population. Without regulation of the recreational boating season, permanent harm will result to wildlife populations.

Response

The BLM study team believes that there is a growing need for uniform management of the river from Lobatos Bridge south through the wild and scenic river segment in New Mexico. Recent wildlife observations indicate there is increased disturbance of nesting waterfowl and predatory birds. It is becoming very apparent that more intensive management of recreational use may be needed to solve these problems. A specialized team will be doing an analysis in 1991, which should help us in future management.

This proposed RMP/final EIS proposes management of 22 miles of the river, which includes the "upper" and "lower" box, as an ACEC and 29 miles as an SRMA. This 22-mile section has also been determined eligible and suitable for inclusion in the National Wild and Scenic River System. The site-specific coordinated resource management activity plan (CRMAP) will detail specific management prescriptions for the entire 29-mile portion of the river corridor.

Comments 104-9,110-5,118-10,122-10,35-10

The management of this river can be accomplished just as well through a special resource management area which would protect the existing values but would not impose the onerous burdens and restrictions on the citizens of the San Luis Valley that a national wild and scenic river would impose.

Response

There are other administrative types of management designations that could be implemented on the Rio Grande Corridor; however, National Wild and Scenic River designation offers permanent protection of the current natural state of the river. No dams nor water projects can be built on designated segments. The intent of the *National Wild and Scenic Rivers Act* is to balance the free-flowing rivers lost with the rivers permanently protected. Current uses of the river and adjoining lands could continue.

Comment 138-2

Recreational activities can be enhanced by the construction of camping sites at access points, while at the same time monitoring and permitting can create protection for wildlife by limiting recreational use to certain parts of the year.

Response

Your comments on river management are appreciated. They appear to be closely aligned with the Preferred Alternative.

Comment H25-4

I don't know how much activity the Rio Grande gets in that stretch, but I think it might be useful for the BLM to promote a more recreational use. Certainly the wild and scenic river status would help that. I think it would also help the local economy, which has a reputation for being not very good.

Response

In this proposed RMP, Segments B and C of the Rio Grande River have been determined eligible and suitable for wild and scenic river designation. Both segments will be managed as a special recreation management area and an ACEC. Recreation opportunities will be enhanced on Segment B and intensive recreation management on Segment C would protect wildlife values.

RECREATION MANAGEMENT (Off-Highway Vehicle Use)

Comments 4-1,5-2,7-2,9-2,12-2,13-2, 14-2,17-3,19-2,20-2,21-1,23-2,24-2, 25-3,27-3,28-3,28-4,29-3,31-1,32-1,33-3, 36-2,37-5,40-1,42-4,43-3,44-2,45-1,46-1, 47-1,48-1,51-1,52-1,53-2,55-3,56-1,58-1, 58-2,59-3,60-2,62-2,67-4,68-1,69-3,70-2, 72-2,73-3,74-1,75-2,76-1,77-2,78-2, 79-2,80-3,81-1,82-3,83-2,84-2,85-2,86-2, 87-1,89-1,91-28, 94-2,96-2,98-299-2, 100-2,101-1,108-3,H6-2,H24-1,H27-1, H28-1,H30-2,H31-3,H32-1, H33-2, H34-1

I would like to insist the BLM prohibit any and all mineral leasing, mineral entry, and off-road vehicle (ORV) use within the ACECs.

Response

It is not the policy of BLM to unnecessarily deny access for use of the lands administered by BLM. Designation of an area as an ACEC does not duplicate nor create a wilderness designation. Other activities can be allowed in ACECs as long as they do not damage nor destroy the special values identified. After an area becomes a designated ACEC, a site-specific plan is written to direct management of the area for protection of the special values, and to identify other compatible uses. This plan serves as the BLM long-term management prescription and commitment for the area. The WSAs located in the San Luis Valley have been nominated for ACEC designation, in the event that some or all of them are not designated as wilderness. OHV use will be prohibited in any WSAs designated as wilderness. OHV use will also be limited to designated roads and trails as well as by applicable seasonal limitations in designated ACECs.

Comment 6-1

The prefered alternative appears to be acceptable to us as is. We do not advocate "open" use of OHV's except in areas where there will be no environmental degradation, such as sand. Therefore, proposing the additional areas of limited use be established rather than being left open agrees with our philosophy. We desire that existing roads remain open for four wheel drive use, and in rare instances we advocate connecting roads to form loops or networks, but we don't advocate or condone random, off road travel.

Response

Your organization's documented philosophy of working to prevent environmental degradation is appreciated. We agree that, for the most part, seasonal or other types of limitations, rather than closures, can prevent impacts to wildlife, plants, and soils. Allowing nonsurfaced roads to remain open to four-wheel drive vehicles year around, however, requires extensive costly erosion control and maintenance operations to help control rutting, gullying, and watershed damage.

Comments 15-1,26-3,30-2,37-2,125-2,H1-1, H16-2,H17-1,H19-2,H19-4, and H20-1

The tract to the west of Great Sand Dunes should be closed to any motorized vehicles. This area is a fragile ecosystem dominated by scattered greasewood and rabbitbrush with sparse dry-land grasses and salt grass. Easily damaged or destroyed by vehicular traffic, this plant community stabilizes the soil and may be responsible for the stability of the main mass of the dunes.

Response

An OHV riding area will not be recommended in the proposed RMP/final EIS. OHV travel in this ACEC is limited to designated roads and trails. Off-highway vehicle use concerns will be addressed in the coordinated resource management activity plan (CRMAP), which will emphasize ecological and culture values rather than OHV use. The Sand Castle Area of Special Concern (approximately 3,595 acres) is one of only two areas of this type in the state of Colorado. Active sand dunes occupy approximately 200 acres, or 6 percent of the area. Approximately 53 percent of the area involves soils that are dune-like and has dunes as much as 15 feet higher than the depressions. The soil surface is winnowed, and there is an appearance of shifting sand. Vegetative cover is sparse. Another 38 percent of the area is occupied by soils that are less alkaline to depths of up to 24 inches. A heavier cover of vegetation occurs here. The remaining 3 percent of the area is occupied by a soil with a very high water table and surface salt accumulations. Vegetation density is not well developed. The hazard of wind erosion on all of the above soils is severe if the vegetative cover is not maintained.

The stability of the main mass of the great dunes is believed to be a function of topography and winds, rather than vegetation. Sparse plant cover on the valley floor does little to protect the loose sand from powerful southwestern winds. If the winds always blew from the southwest, the smaller dunes would move toward the mountains at a rate of 2 to 3 feet per week. Storm winds from the northeast, however, can blow dune crests back to the west as much as 18 feet in 24 hours. These "reverse" dunes comprise the major bulk of the great dunes. Newly arriving sand could contribute to an eventual height increase of these active dunes, but is not believed to be responsible for stability. As stated in the Preferred Alternative, there are several competing demands for the lands within this area, and potential resource conflicts will be addressed on a site-specific basis in a CRMAP. This activity plan will determine site-specific management and will address OHV/cultural/ecological conflicts.

Comment 15-3

The Sand Castle area has large resident populations of antelope, deer, and presently, a herd of more than 100 elk. Motorized traffic would not be in the best interest of these animals.

Response

The Sand Castle area is on the periphery of the overall ranges of mule deer, elk, and pronghorn antelope and as such provides marginal big game habitat. Although big game may be viewed within the area, on a random basis, the proposed ACEC is not considered important big game

habitat because several habitat values are limited or absent. The area does not provide suitable escape, thermal, or hiding cover for big game, especially during the harsh winter months. High quality and quantities of food and water are also limited. Elk utilize the habitats to the northeast of the proposed ACEC, along Big Spring Creek and the forested areas south and east of the sand dunes. Mule deer crucial winter range lies south of the dunes as does the important pronghorn antelope habitat.

Motorized vehicle use of the Sand Castle area will result in minimal impacts to mule deer, elk, or pronghorn antelope and their habitats. Some vegetation will be lost and soils loosened, making them more susceptible to wind erosion. Some direct harassment of big game may also occur, but because of the limited use of the ACEC by these species, the level of harassment is expected to be minor. OHV will be limited to designated roads and trails.

Comment 15-5

The Great Sand Dunes adjacent to Sand Castle is a Wilderness. The Park Service attempts to maintain fences in the area, but with the rapidly shifting sand these barriers are ineffectual as they are either covered by sand or undermined. There is a great danger of heavy off-road vehicle usage originating in the study area on the Dunes Wilderness.

Response

There is a strong likelihood of unauthorized OHV use encroaching into the Great Sand Dunes Wilderness without extensive boundary identification and enforcement. This possibility is well understood and will be addressed in a CRMAP to be written for this area. One purpose of this CRMAP will be to determine how the ACEC could be managed to address the OHV/cultural/ecological conflicts.

Comment 15-6

The numbers of people killed or seriously injured while riding all-terrain vehicles is staggering. There is a real threat that lawsuits against the BLM may result from death or injuries to riders in the Sand Castle Area.

Response

There are numerous outdoor recreation activities allowed on BLM-administered lands that involve an element of risk to the participants. Among them are hunting, whitewater rafting and boating, rock climbing and mountain climbing, back-country driving on primitive roads, wilderness hiking and camping, and ATV use. It is the responsibility of the user to know and understand the limits of their abilities and the condition of their equipment.

Comment 91-31

CEC supports vehicles being permitted only on designated roads. The BLM then can implement a white-arrow signing system which would better protect the area. Mining, oil and gas development and the construction of powerlines or pipelines are not compatible with the wildlife and special plants that are supposed to be protected in the Los Mogotes ACEC.

Response

All of the Los Mogotes ACEC will be seasonally closed to vehicle travel between December 15 and March 31, and OHV travel will be limited to designated roads and trails

Any proposed utility route along the south side of the proposed Los Mogotes ACEC will follow Colorado State Highway 17 and any utility lines, etc., will probably be constructed on lands adjacent to BLM. Utility line construction proposed across the Los Mogotes will be considered, but most likely it would be denied because of wildlife and special plants. Better viable alternatives are available rather than crossing the very rough and rocky terrain of the Los Mogotes. Please see page 3-32 of the draft RMP/EIS, which explains why no utility route is identified west of Antonito.

Comments 91-33,136-1,145-18, and 145-19

Our major concerns regarding recreational use center around ORV use restriction. These restrictions are totally inadequate. Almost the entire Resource Area is left open to uncontrolled off-road vehicle use. This is not a prudent management decision. We can only support very limited areas being left open to ORV use. In order to protect the outstanding resources found on these BLM lands, much stricter controls on ORV use need to be implemented. ORVs can destroy vegetative cover, wildlife habitat and make areas undesirable for other forms of recreational use. We recommend a complete reworking of this section of the plan to better protect the resources from the destructive use of ORVs.

Response

Most public lands administered by the BLM are classed as suitable for multiple use management. OHV use, as a dispersed type of outdoor recreation, is considered compatible with other resource values. The OHV limitations (seasonal and limited to designated roads and trails) outlined in the Preferred Alternative, are believed to be adequate and will be carried forward into the proposed RMP/final EIS.

The BLM slogan "USA: Use, Share, Appreciate" is a very worthwhile goal. The BLM supports your concern for the

environment and your continuing help in educating users to conscientiously use and appreciate the natural resources on the BLM-administered lands.

Comment 113-1

The Board of Directors of the Friends of the Dunes, the citizens support group for the Great Sand Dunes National Monument, would like to express our opposition to the designation of the combined Sand Castle/Cattleguard location as a "Limited" use area for Off-Highway Vehicles (OHV) as proposed in the September 1989 draft volume of the San Luis Resource Management Plan. We believe that this designation should be changed to "Closed" to OHV.

Response

There are several competing demands for the lands in the proposed Sand Castle ACEC. Potential resource conflicts will be addressed on a site-specific basis in a coordinated resource management activity plan (CRMAP) to be written. The purpose of this plan will be to determine how the area could be managed to emphasize solving the OHV conflicts with cultural/ecological resources. OHV use will be limited to designated roads and trails.

Comments 114-8,114-9,114-10,145-20,153-3, 153-4,153-5, and 153-6

We question how OHV use will be confined to this area. The experience of staff at GRSA is the contract patrol and enforcement are needed to prevent unauthorized use and vandalism of natural and cultural resources. Does the BLM have the enforcement funds and staff to assure the protection of these resources? And, if the State of Colorado will administer the area, do they have the means to protect natural and cultural resources?

Response

There is a strong likelihood of unauthorized OHV use encroaching into the Great Sand Dunes area without extensive boundary identification and enforcement. Vandalism of significant cultural resources is also recognized. These possibilities are well understood and will be addressed in a CRMAP to be written for this area. The OHV play area is not recommended in the proposed RMP/final EIS, and OHV concerns will be addressed in a CRMAP, which will emphasize cultural and ecological values rather than OHV use in the area.

Comment H25-1

One of the aspects of riparian that I would urge the BLM to have more restrictions on, on usage by ORVs in riparian areas.

Response

In the Preferred Alternative, the draft RMP states that OHV travel is restricted to designated roads in riparian areas. This riparian restriction has been carried into the proposed RMP/final EIS.

Comment H34-5

There are a couple of areas we feel vehicle use is not compatible in. A couple -- one in the Sand Castle ACEC. With the very important cultural resource in that area, we cannot envision that the area would have been compatible with off-road vehicle use. Trickle Mountain is an example where I think a white arrow signing might be appropriate; okay?

Response

There are several competing demands for the lands in the proposed Sand Castle ACEC. Potential resource conflicts will be addressed on a site-specific basis in a coordinated resource management activity plan yet to be written. The purpose of this plan will be to determine if portions of the area could be managed as an OHV riding area.

The Preferred Alternative recommends that OHV use in the Trickle Mountain area be subject to seasonal limitations and travel be limited to designated roads, to protect wildlife, and soils and watershed values.

WILD AND SCENIC RIVER

Comments 2-4,5-5,8-4,9-4,11-3,12-5,13-5, 16-2,17-1,18-1,19-4,20-5,21-2,22-5, 23-4, 24-4,26-1,27-1,28-1,29-1,30-5,31-3,32-2, 33-2,34-2,35-1,36-1,37-3,38-1,41-2,42-1, 43-1,44-4,45-3,48-3,50-1,52-4,53-1,54-1, 55-1,56-4,57-2,59-1,60-1,61-2,62-3,63-1, 64-1,65-1,66-3,67-1,69-1,70-5,72-5,73-1, 74-3,75-4,76-2,78-5,77-5,79-4, 81-4,82-4, 84-4,85-5,86-5,88-4,91-12,91-13,94-5,96-4,

101-4,103-2,106-4,108-1, 121-2,H6-4, H10-1, H21-3,H22-1,H24-5,H25-2,H27-4, H28-4,H29-4,H30-3,H32-2, and H33-5

I understand that the BLM has recommended only 8.8 miles of the Rio Grande River for Wild and Scenic Designation in Colorado, from the Lobatos Bridge south to the New Mexico border. I would like to recommend that the BLM extend the designation an additional 12.3 miles north to the Lasauses Cemetery, as this portion has equally outstanding characteristics.

Response

The 22-mile section of the river corridor directly north of the New Mexico border has been determined to meet eligibility and suitability criteria for wild and scenic river designation.

Expected results from proposed management include improved riparian, wildlife and fisheries habitat, aesthetics, and recreation opportunities. Of special importance is the raptor corridor for eagles and waterfowl habitat.

Comments H4-2 and H5-2,

We all know that any wild and scenic river designation will include minimum stream flows, and as Mr. Kopfman pointed out, the minimum stream flows are going to come out of some water users hide because the water is not available from any other source, which will severely hurt the economy of the entire valley.

Response

Section 13(b) of the *National Wild and Scenic Rivers Act* states that the jurisdiction of the states and the United States over waters included in a national wild, scenic, or recreational river area shall be determined by established principles of law. None of the 16,000 + adjudicated valid existing water rights, therefore, will be adversely affected. Section 13(e) states that nothing in the Act will change any existing interstate compacts. Existing stream conditions are sufficient to satisfy the needs of any special management designation. There is an implicit Federal reserved water right in the Act; however, there is no quantified reserved water right for the wild and scenic segment of the Rio Grande River in New Mexico. Pending further designation, BLM may have to quantify needs and file through the Colorado State Water Court.

Comments 4-4,H26-13

Wild and scenic river: The San Luis Valley is distant from the major population centers of Colorado, but is close to many New Mexico people; the area could benefit from a longer stretch of "Wild and Scenic" river designation to attract some vacationers and tourist dollars. Nine miles is not enough to attract much interest from the raft or canoe people, but 20 or 30 miles probably would.

Response

If Segment C of the Rio Grande River in Colorado is designated as part of the National Wild and Scenic River System, it is important that it be managed consistently with the adjacent segment in New Mexico. The existing New Mexico segment is designated as "wild," and management is directed at preserving the wildlife values and the primitive conditions there. Increased visitor use just prior to and during wildlife nesting periods is considered a significant negative impact.

Segment B has also been determined eligible and suitable for wild and scenic designation and will be managed to provide for and encourage increased visitor use. Its length along the river involves several locations of readily accessible launch and take-out points.

Comments 18-4,18-6,18-9,18-10,18-11, 18-12,119-3,122-12,H9-1

In addition, the study draft, and particularly attachment E to the draft, do not identify how the Bureau of Land Management proposes to deal with the potential for upstream impact caused by the designation of that eight point eight miles as a wild river.

Response

Segments B and C of the river corridor are determined eligible and suitable for wild and scenic designation. The primary purpose of wild and scenic river designation is to maintain the existing outstandingly remarkable values and free-flowing characteristics of designated rivers. No major dams nor water projects can be built within any designated river segment.

Each section of a designated river is classified as either "wild," "scenic," or "recreational," depending on the amount of development along each section. Once classified, the river is managed to maintain that classification within one-quarter mile of the river bank.

Wild and scenic designation does not create an undeveloped natural area. Current uses of the river and adjoining lands can continue, and normally land is not condemned. Section 6(b) of the Act specifically forbids condemnation of private land if the government administers more than 50 percent of the acreage. BLM policy is to acquire a scenic easement if necessary rather than pursuing

condemnation. If a proposed development is clearly incompatible with the river, the government can acquire a scenic or conservation easement. Any provision for public use on private lands would have to be specifically purchased from the landowner.

The existing stream conditions are sufficient to satisfy the needs of any special management designation. Pending future designation, BLM may have to quantify needs and file through the Colorado State Water Court. Since BLM is not proposing any changes in the present flow or administration of the river, we do not foresee any upstream impacts. We will include in our wild and scenic recommendation that BLM does not believe a reserved water right is necessary; however, there is an implicit Federal reserved water right in the Wild and Scenic Rivers Act.

The study report for the Rio Grande River has been revised and expanded into Appendix A in this proposed RMP/final EIS.

Comment 91-11

Items that must be addressed in such a plan include:

-What quantity of water would be necessary to protect the outstandingly remarkable characteristics of the river.

-What effects, if any, would this water right have on the Rio Grande Compact.

-An exploration of why this very junior water would not effect an existing senior water right, even if a change in use or point of diversion was to occur.

-What the BLM envisions as its needs for private property acquisition, scenic easements and public access easements.

Response

The existing stream conditions are sufficient to satisfy the needs of any special management designations. The desirability of scenic easements is recognized, and specific plans for acquisition would be pursued.

Section 13(e) states that nothing in the Act shall be construed to alter, amend, repeal, interpret, modify, or be in conflict with any interstate compact made by any States that contain any portion of the national wild and scenic river system. Section 13(b) of the Act states that jurisdiction of the States and the United States over the waters included in the national wild and scenic river area shall be determined by established principles of law. The 16,000+ adjudicated existing water rights, therefore, would not be adversely affected.

Also see previous response to comments 18-4 through H9-1.

Comments 104-4,118-5,122-5, and 135-5

The Rio Grande below the Colorado state line is already designated as a wild river and this short segment in Colorado is unnecessary to protect the river within New Mexico.

Response

Because of the physical difficulty of accessing the Rio Grande River gorge, the area at Lobatos Bridge is one of the most logical access points for river users wanting to float the entire length of the gorge.

The BLM study team believes that there is a growing need for uniform management of the river from Lobatos Bridge south. Recreation use is growing rapidly; there is increased disturbance of nesting waterfowl and predatory birds; and successful wildlife reproduction is being diminished. It is becoming very apparent that more control of recreational use is needed to solve these problems. The purpose of the *Wild and Scenic Rivers Act* is to maintain and enhance existing stream conditions.

The 22-mile river corridor in Colorado has been determined eligible and suitable for wild and scenic designation.

Comments 104-5,107-15,118-6,122-6, and 135-6

On pages E-10 and E-11, the purpose behind this designation becomes apparent.

It is there that you suggest the necessity for designating two miles of the reach solely for the purpose of allowing points for floating access to be included in the reach. It is also on these pages that you suggest that management of this area be turned over to the Taos Resource Management Area. We find this completely unacceptable.

Response

The criteria for "wild" river designation requires that these river segments be generally inaccessible except by trail. Because of this and the actual physical difficulty of finding suitable launch sites, the Lobatos Bridge site is a favored, logical access point for river users wanting to float the entire gorge of the Rio Grande.

Because of the increasing conflicts between wildlife and recreational use of the river, management continuity is essential. This will most likely result in limiting permitted use. At the present time, the Taos Resource Area issues the permits for river use because of the wild and scenic river status in place in New Mexico. Of the 22-mile stretch of river determined eligible and suitable for wild and scenic

designation, 14 miles will be managed to enhance recreational opportunities and 8 miles to protect wildlife values. The SLRA and Taos RA will coordinate management of these river segments in accordance with specific management guidance outlined in a site-specific management plan (CRMAP). The SLRA will take the lead for management of the river within Colorado.

Comments 104-8,110-4,118-9,122-9,124-2, and 135-9

This river should not be managed solely for the benefit of a few floaters. It does not have the requisite outstanding remarkable values to justify its inclusion.

Response

The emerging need to control the level of boating use just prior to and during nesting periods, to reduce impacts to wildlife, in Segment C is recognized.

Determination as to whether or not a river area contains "outstandingly remarkable" values is a professional judgment on the part of the study team. The study team believes that many of the same values determined to be significant in designating the New Mexico segment as wild and scenic are present in Segments B and C in Colorado. For further details see Appendix A.

Comments 104-11,107-3,109-1,114-3&4, 115-1,116-3,117-1,118-12,119-8, 21-1, 129-1, 133-1,134-1,135-12, and 143-1

Of primary concern to the citizens of the San Luis Valley represented by the Rio Grande Water Conservation District is the suggestion that the Rio Grande Study Report contained in Appendix E to the San Luis Resource Management Plan constitutes an acceptable or proper Environmental Impact Statement. Nothing could be further from the truth. Appendix E, treated as an Environmental Impact Statement, does not consider any impacts whatsoever as a result of this federal action outside of alleged impacts contained within the reach of the river under study.

Response

Appendix E, Rio Grande River Study Report, has been extensively revised and is part of this document (Appendix A). This study report was not intended to be an environmental impact statement. The entire draft RMP/EIS must be read and reviewed to understand the complete evaluation/analysis of the impacts of recommending or not recommending a segment of the river for inclusion into the national system. The Environmental Protection Agency (EPA) determined the DEIS to be acceptable environmental documentation.

Comments 105-1,109-4,115-4,117-4,129-4, 130-2,133-4,134-4,142-1,143-3,147-3, and 148-3

The reach of the Rio Grande between Lobatos Bridge and the New Mexico state line should be administered as if it were Wild & Scenic, and BLM should support Wild & Scenic designation.

Response

In this proposed RMP, Segments B and C have been determined eligible and suitable for wild and scenic designation. Nonimpairment interim management will be accomplished by excluding any facility development that will impair the eligibility or classification of the area, limiting recreational and grazing use to existing levels, and applying ACEC status to the proposed 22-mile corridor.

Comment 107-8

On page E-1 of Appendix E there is a discussion concerning the conclusion that the reach warrants inclusion in the national Wild and Scenic River. The statement was made that it was considered with the New Mexico reach and dropped, so this current action is a reconsideration. However, there is absolutely no justification stated for reconsideration nor is there any explanation why this reach was dropped the first time. Absent specific facts to the contrary, the federal agency should be guided by the action of its predecessors and Congress in not designating the reach, rather than to pass over the apparent Congressional determination without further inquiry.

Response

The *Federal Land Policy and Management Act* (FLPMA) and other BLM planning guidance directs BLM to study and evaluate potential rivers during any land use planning process. Although the Colorado portion was considered at the time of the New Mexico designation, a study was not actually completed for the Colorado segment.

Comments 107-13 and 107-17

Most important to the San Luis Valley, to this District, and to the citizens we represent is the provision in the statute which provides that your agency will seek to "restore" this river to its wild state once it has been designated.

Response

Section 10(a) of the *National Wild and Scenic River Act* states: "Each component of the national wild and scenic rivers system shall be administered in such a manner as to protect and enhance the values which caused it to be included in said system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values. In such administration primary emphasis shall be given to protecting its esthetic, scenic, historic, archaeological, and scientific features. Management plans for any such component may establish varying degrees of intensity for its protection and development, based on the special attributes of the area." There is, however, no requirement to restore a designated segment to a wild state.

The need to protect or enhance riparian vegetation is a definite goal for the river corridor. The BLM study team is aware of the highly appropriated and regulated nature of the 16,000+ adjudicated water rights in the Rio Grande River. Existing stream conditions are sufficient to satisfy the needs of any special management designation.

Comment 107-16

Finally, we do not understand why it is inappropriate to manage this resource through a special resource management area. We certainly do not oppose protecting land forms in the Rio Grande Canyon which can be accomplished, without adverse water right consequences, through such a special management option. It would have all of the advantages to your agency with none of the statutory and regulatory disadvantages inherent in the wild and scenic river designation.

Response

It is not inappropriate to manage resources under various administrative designations. By law, however, BLM must consider the alternative of wild and scenic river designation, which affords enduring protection. As pointed out elsewhere, a downstream segment of this river was designated a wild and scenic river in 1968, and has been functioning very satisfactorily under the existing levels of upstream water use.

Comments 107-24,110-6,118-13,122-13, and 135-13

We respectfully request that the Bureau of Land Management withdraw its recommendation to designate the Rio Grande above the Colorado-New Mexico stateline as a wild and scenic river and instead manage the area pursuant to special management status.

Response

BLM is required by law, FLPMA, and other BLM planning guidance to study potential rivers in the course of planning for the management and use of the public lands. Your recommendation to manage the river corridor as a special management area is described in Appendix E, Production Resource Enhancement Alternative, and was considered during this planning process. This appendix has been extensively revised and is now Appendix A to this document. The 22 miles of the Rio Grande River (Segments B and C) have been determined eligible and suitable for wild and scenic designation and is designated as an ACEC. An SRMA will encompass 29 miles of river corridor.

Comment 114-12

The BLM is to be complemented on the Rio Grande River Study Report (Appendix E).

Response

Your comments are appreciated; however, because of 100+ comments, the study report has been revised extensively and is part of this proposed RMP (Appendix A).

Comments 116-1,124-1,124-5, and H5-1

We therefore respectfully request that you withdraw your recommendati16Xo include this portion of the Rio Grande River in the Wild and Scenic River System.

Response

The BLM is required by law, FLPMA, and other planning guidance to study potential rivers in the course of planning for the management and use of the public lands. Please also refer to our response to Comment 107-24, page 2-44.

Comment 120-1

Please consider designating the reach of the Rio Grande between Lobatos Bridge and the N.M. state line as a Special Resource Management area administered as if it were Wild and Scenic - with equal emphasis on wildlife protection and recreation.

Response

The lower 22 miles of the river have been determined eligible and suitable for wild and scenic designation and will be managed according to interim management policy outlined in Attachment 7 of Appendix A. This 22-mile portion

will be designated as an ACEC and a 29-mile portion will be managed as an SRMA.

Comment 124-3

Secondly, one of the principal reasons the Wild and Scenic River Act was proposed for passage by Congress was to deter the building of river dams. Since the use of water in the Rio Grande is so tied up by water rights, the Rio Grande Compact, and the Closed Basin Project, we seriously doubt that dam building should be a reason to put it under protection.

Response

Wild and scenic designation seeks to maintain and enhance the existing stream conditions of a river. No dams nor water projects can be built on the designated river segments. New mining claims will be restricted. The intent of the Act is to balance the unprotected rivers with the rivers permanently protected.

Comments 125-5 and 144-5

Now to the mighty Rio Grande River, all 41.5 miles studied by the BLM should receive Wild and Scenic designation and should have a wide protective corridor. The Rio Grande is an abused river, the BLM can correct this condition for a few miles.

Response

Your concern is noted and is carefully being considered. Please refer to Appendix A, Rio Grande Wild and Scenic River Study Report in this document.

Comments 127-1 and 127-15

Fifth, we commend the planners objective to provide "[n]onimpairment interim management" for the river corridor. However, the RMP should provide particular management prescriptions designed to protect the resource values and character of the river 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).

Response

The prescribed nonimpairment interim management is outlined in Appendix A, Interim Management (section 7) and Attachment 7.

Comments 127-2,127-3, and 127-4

The Draft San Luis RMP fails to comply with administrative guidance to examine rivers other than the Rio Grande. The Draft San Luis RMP indicates the planners did not examine any potential wild and scenic rivers other than the Rio Grande. Other candidate rivers within the RMP may include Black Canyon, South Piney Creek and Zapata Creek, each of which are within wilderness study areas adjacent to the Rio Grande National Forest. See RMP at 2-42. The BLM should document the values of these streams and, if outstandingly remarkable values are present, coordinate an eligibility study of these streams . . . .

Response

The draft San Luis RMP did fail to document our findings of noneligibility for other streams in the planning area. These creeks are free-flowing, but the consensus of the BLM study team is that none of them have any unique, outstandingly remarkable values worthy of designation to the National Wild and Scenic River System. See Attachment 1 in Appendix A of this document. The candidate rivers you mentioned, of which very short segments occur on BLM-administered land, are dry gulches.

Comment 127-6

First, our principal concern is with the "Analysis and Evaluation" section. The planners do not seem to understand the distinction between "recreational" use and a "recreational" classification. For example, the planners have apparently decided, based upon the opinion of the Alamosa Refuge manager, that a "recreational" designation is not compatible with the wildlife refuge. Id. at E-10. A river is eligible for inclusion in the national rivers system if it possesses one or more outstandingly remarkable values.

Response

The coordination between BLM and USFWS concerning wild and scenic designation focuses on suitability rather than eligibility. It is believed that designation of Segment A as an addition to the national system, under any classification, will result in increased publicity and public awareness and could increase the potential for increased public use demands, which would be in conflict with the management objectives of the refuge. It is the opinion of the study team that there are outstandingly remarkable values in this

portion of the river corridor. The study report has been extensively revised and is Appendix A of this proposed RMP.

Comment 127-7

Similarly, the study states that Segments A and B do not meet the "eligibility requirements for wild, scenic, or recreation designation." Id. at E-11. The next several sentences describe criteria that are relevant to classification, i.e., shoreline development, but that are absolutely irrelevant to a determination of the river's eligibility. Apparently, these river segments do not qualify for either wild or scenic classification. If that is the case, the appropriate classification if (sic) recreational. The planners, however, state that since the river recreational values "are not considered to be remarkable, mainly because of the lack of a unique physical river setting", the river lacks the "outstandingly remarkable recreation values required for a recreation classification." Id. The planners are simply mistaken in this conclusion. Outstandingly remarkable recreational values are not required for a river to be classified as recreational.

Response

In light of additional information, (i.e., wildlife values/visual resources/ scenic viewshed) and from public review of the draft RMP/EIS, the entire 41-mile river corridor meets the eligibility requirements and has been classified. Only 22 miles (Segments B and C) have been determined suitable.

Comment 127-8

Further, it would appear that Segment B at least received substantial recreational use. See id. at E-12 and Table E-1. American Rivers suggests that when the planners revise the study, they reconsider whether the recreational use of Segment B (and A), particularly when combined with the recreational opportunities of the river downstream, qualify as outstandingly remarkable.

Response

The amount of recreational use of Segment A of the Rio Grande River has not been documented. Observations by BLM personnel lead us to believe that this is of a dispersed nature and is not nearly as high as that in Segments B and C, which are the preferred and most accessible areas of the Rio Grande River Upper and Lower Boxes. The study report (Appendix A) has been revised.

Comment 127-10

Third, although the study identifies the length of the river segment that is studied, the width of the corridor is never explicitly identified. E.g., id. at E-3. Agency direction provides that the appropriate corridor for purposes of the study is one-quarter mile wide on each side of the river. The apparent failure to identify those outstandingly remarkable values within one-quarter mile of the river must be corrected.

Response

The wild and scenic river study team is aware of the agency directed minimum study area of one-quarter mile width from each bank, and did in fact consider the resource values there.

The study corridor is initially described in Chapter 2, page 2-49, as the Rio Grande River Corridor Special Recreation Management Area. In the same paragraph, it is explained that a portion of this described corridor is also considered for wild and scenic river designation. Inadvertently, this width description was not repeated in the study report in Appendix E. The study report has been revised and expanded as Appendix A to this proposed RMP/final EIS.

Comments 127-11 and 145-17

Fourth, the study should identify the resource values present in each segment to determine whether the segment possesses outstandingly remarkable values. The study fails to do this.

Response

The Physical Description and the Analysis and Evaluation sections of the study report consider riparian, cultural, water quality, recreation, paleontological, vegetation, fish and wildlife, scenic, and geological values, as well as ownership patterns.

Conclusions concerning "outstandingly remarkable" values, which differ from the professional judgment of the study team, do not indicate these values were not identified and considered.

The study report has been revised and expanded as Appendix A for this proposed RMP/final EIS. Additional information regarding wildlife values, visual resources, and scenic viewshed indicate Segment A is eligible for wild and scenic designation; however, BLM does not believe this segment meets suitability criteria because of manageability.

Comments 127-12&13,131-2,132-3&6, and 138-1

Section B has the necessary attributes of a scenic river under the Wild and Scenic River Act - wildlife and recreation opportunities are present. It should be included in a Wild

and Scenic Bill and Section A should be further investigated for inclusion.

Response

Segment B has been further evaluated and determined to be eligible and suitable for wild and scenic designation.

Segment A was considered separately because of the small amount of public land adjacent to the river. Without substantial control (40 to 50 percent) of the shoreline, BLM would not have the ability to regulate access and public use there. The study report has been revised and expanded as Appendix A to this proposed RMP/final EIS.

Comment 127-14

Segment C appears to possess outstandingly remarkable scenic, fish and wildlife, and recreational values. Id. The geologic values of the area also appear to qualify it for the national system. Id. at E-10.

Response

American Rivers and the BLM study team are in agreement concerning the eligibility and suitability of Segment C of the Rio Grande River to be recommended as an addition to the National Wild and Scenic River System. Segments A and B have been determined eligible and Segment B has also been determined suitable.

Comment 128-7

The Rio Grande is over-appropriated with over 5,000 cfs decreed water rights with priority dates of 1916 or earlier. The Rio Grande is highly regulated and water use is very important to the economy of the basin. There appears to be no benefit to designating the lower reach as wild and scenic.

Response

The primary purpose of wild and scenic river designation is to maintain the outstandingly remarkable values and free-flowing characteristics of designated rivers. The designation seeks to maintain and enhance the existing stream conditions. No dams nor water projects can be built on the designated river segment. Please refer to comment/response 107-16.

Comment 131-1

The New Mexico River Outfitters Association concurs with the findings of the Draft Resource Management Plan and EIS that Segment C of the Rio Grande River, from Lobatos Bridge to the State line, should be added to the National Wild and Scenic River System, so as to better protect the entirety of the Rio Grande Gorge and the outstanding wilderness and recreation values located therein.

Response

The lower 22 miles of the river have been determined eligible and suitable for wild and scenic designation. This 22-mile portion will be designated as an ACEC; however, 29 miles will be managed as an SRMA.

Comments 132-1,141-2,145-22,and 151-1

We feel the Natural Resource Enhancement Alternative is the most appropriate alternative for the management of the 41 mile distance of river under study; . . . . .

Response

Your written input to the San Luis Resource Management Plan is appreciated. Your concern is noted and is carefully being considered. For more information see response 127-7 and Appendix A of this proposed RMP/final EIS.

Comment H8-1

I'm speaking against the proposed designation of a wild and scenic river from the New Mexico border northward because I have seen, especially that private land in the San Luis Valley has been the most efficient means of improving the environment as far as greenry (sic) and as far as wildlife population is concerned here in the San Luis Valley.

Response

It is not the desire nor goal of the government to interfere or regulate activities on private lands within a designated W&SR corridor. Current uses of the river and adjoining lands will be allowed to continue. In the BLM resource management planning process, private landowners' concerns are considered and evaluated as to their compatibility with other resources within the corridor. A primary objective of wild and scenic river designation is to maintain and enhance river-related natural values.

Comments H9-3,H18-4,H18-8, and H18-13

What are the water quality standards. How will it affect the close basin project and it's operation.

Response

The Rio Grande River downstream from the Alamosa County line is classified for recreation class I (body contact), aquatic

class I (warm and cold water fisheries), and agricultural uses. The existing water quality meets these standards. Water quality standards are not specifically defined in the *National Wild and Scenic Rivers Act*; only that waters must be unpolluted in segments classified and designated as "wild." No water quality standards are listed at all for scenic or recreation river classifications. The existing *Federal Clean Water Act* national goal, however, is for all waters to be fishable and swimmable.

Section 12(c) of the Act states that the head of any agency administering a component of the national wild and scenic river system shall cooperate with the Secretary of the Interior and with the appropriate state water pollution control agencies for the purpose of eliminating or diminishing the pollution of waters of the river. Section 13(e) states that nothing in the Act shall be construed to alter, amend, repeal, interpret, modify, or conflict with any interstate compact made by any states with any portion of the national wild and scenic river system.

Existing stream conditions are sufficient to satisfy the needs of any special management designation. Also see response to Water Resources Comment 107-18, page 2-16.

VISUAL RESOURCE MANAGEMENT

Comment 91-4

We recommend at a minimum these areas be given a no surface occupancy stipulation. The plan also fails to provide protection stipulations for cultural sites, waterfowl areas, municipal watersheds, scenic vistas, and public highway viewshed. Rare, threatened and endangered species of wildlife should be inventoried and their habitat be closed to leasing.

Response

Special lease stipulations for threatened and endangered species and cultural sites were determined to be unnecessary as the standard lease terms, regulations, and existing legislation provide sufficient protection of these resources. There are no municipal watersheds situated on public lands within the SLRA so no stipulation is needed. The waterfowl areas within the planning area have been provided with a timing limitation stipulation in order to avoid an increase in nest abandonment or an altering of breeding behavior. This was determined to be sufficient mitigation for these sites. An analysis of impacts to visual resources did not identify a need for the imposition of special leasing stipulations within the SLRA.

Comment 145-21

VISUAL RESOURCE MANAGEMENT - We support the objective of the Natural Resource Enhancement Alternative, with one additional concern. Our recommendation of holistic management for the Rio Grande Corridor and adjacent proposed ACEC's motivates this addition to the SLRMP: that this region of the RA is currently VRM Class II and should be identified as such in the RMP with appropriate management to follow.

Response

The scenic quality of the BLM lands surrounding the significant areas identified in your comment are considered to be fairly common to this physiographic region. The combined importance of scenic quality, visibility, and visual sensitivity, however, are considered to be high enough to warrant management of the surrounding areas as Class II.

The management objectives for Class II lands are very restrictive. Changes in any of the basic elements caused by a management activity should not be evident in the characteristic landscape.

Comment H26-3

Another area that we feel is very important are special recreation management areas and wild and scenic river corridors. The Rio Grande did receive a no-surface occupancy designation, but once again, we would prefer no-lease in those areas, mainly because there could be impacts from directional drilling from outside of the area within the viewshed, or something of that nature.

Response

The impacts to visual resources as a result of fluid mineral operations were considered in our analysis of the SRMA/ACEC/wild and scenic suitability areas. Specifically, the visual resources within the Rio Grande River Corridor were an important factor in the decision to require a no surface occupancy stipulation. This decision, however, was based on a determination that an NSO provides the necessary visual protection and also provides the opportunity to lease the fluid mineral resources for possible development by methods from outside the corridor. Fluid mineral operations on public lands adjacent to these areas as well as all public lands within the resource area will utilize the visual mitigation measures identified as standard operating practices in the minerals appendix.

Comment H26-5

Another concept that the Forest Service is using in their Pike/San Isabel oil and gas lease amendment is to have corridors along public highways in which a lease surface occupancy will not be permitted to protect the viewshed along public highway rights-of-way. We would recommend BLM do this. Also as well as in areas where there may be scenic vistas along highways or trails.

Response

The analysis of impacts to visual resources from fluid mineral operations based on the reasonably foreseeable development for the SLRMP identified that the short-term impacts to visual resources during the drilling stage did not warrant such a restrictive stipulation. The use of standard operating practices during production operations will sufficiently mitigate the impacts through screening, siting, and color requirements (see Appendix C).

ARCHAEOLOGICAL RESOURCES

Comments 5-4,26-3,37-2,53-2,80-114-1, 153-8,H19-3,H20-1

We have documented incidents of archaeological resource vandalism and theft along our common boundary with the Sand Castle area. OHV use may adversely affect archeological sites and can lead to increased site vandalism. Again, the question of OHV regulation and the protection of important resources surfaces.

Response

OHV use constitutes the greatest threat to cultural resources in this area. BLM studies on the western slope directly correlate vehicular access to a high incidence of vandalism. It is known that the Sand Castle area contains a dense base of archaeological resources, however, a complete inventory is lacking.

The OHV play area will not be recommended in the proposed RMP/final EIS and OHV concerns will be addressed in a CRMAP, which will emphasize cultural and ecological values rather than OHV use in the area.

Comment 80-1

Section 106 of the *National Historic Preservation Act* as implemented by the Advisory Council regulations 36 CFR 800 must be followed on all projects that have the potential to affect cultural resources.

Response

It is the policy of this Bureau to fully comply with all legislation, regulations, and agreements that affect the management and any subsequent disposition of cultural resources. This includes compliance with 36 CFR 800 as well as procedure detailed in the programmatic memorandum of agreement (PMOA) with your office. SHPO will be afforded every opportunity for timely comment on any necessary actions.

Comments 80-2,91-4

Due to the importance of the cultural resources within the San Luis Valley, we strongly urge that the Bureau of Land Management develop a cultural resource management plan for this area. The plan also fails to provide protective stipulations for cultural sites . . . .

Response

Cultural resources are fully protected by Federal legislation dating from 1906 through the *Archaeological Protection Act* of 1979 as amended in 1989. BLM policy in complying with these various regulations includes the inventory of these resources, the assessment of their significance, and the mitigation of any adverse impacts on these resources. This current management effort will provide the base for various cultural resource management plans (CRMPs); e.g., Punche Valley, La Garita Creek, Dry Creek, etc. A valley-wide CRMP will also be done on the remaining cultural resources. These plans will recommend the disposition of individual sites for the greatest benefit to the public.

ECONOMIC CONDITIONS AND SOCIAL ENVIRONMENT

Comments 85-5,104-10,118-11,122-11, and 135-11

Please extend additional 12.3 miles of river (north) to Lasauses cemetery -- this is a valuable habitat stretch of water lands. Encouraged recreational uses will guarantee economic increase & tourists will enjoy these preserved lands.

Response

The region will benefit economically from the proposed designation of the 22-mile portion of the Rio Grande River determined eligible and suitable as a wild and scenic river. BLM is mandated by FLPMA and other planning guidance to analyze rivers and streams for eligibility and suitability.

These criteria identify values other than economic to be considered for determination of eligibility and suitability.

Comments 107-7,119-2, and H8-2

Yet, the Environmental Impact Statement makes no inquiry into the source of the water for such flows or the economic and environmental impact on other water users and citizens within the San Luis Valley as the result of efforts to acquire those instream flow rights.

Response

Impacts to San Luis agriculture are not expected. Please see response 128-2, page 2-15, under Water Resources, on the likelihood of water being taken from the present San Luis users. Since there is no expected change to water in the valley from Congressional designation of the river as a component to the national system, it is very unlikely there will be any kind of impact to the social environment of the valley water users.

Comment H25-4

...don't know how much activity the Rio Grande gets in that stretch, but I think it might be useful for the BLM to promote a more recreational use. Certainly the wild and scenic river status would help that. I think it would also help the local economy, which has a reputation for being not very good.

Response

No recreation projections of use were made. Increases in use, no doubt, will help the local economy as tourists will spend money in the local areas. Please see response to H25-4 under Recreation.

Comment H31-2

We need to look at cost/benefit ratios which take into account the aesthetic and scenic values of an ACEC.

Response

The benefits or willingness to pay for aesthetic or scenic values are not bought and sold in well defined markets and will be very difficult to measure. Because of lack of information on benefits, we have not done a cost/benefit analysis of ACECs. We do know generally that "designating" or "setting aside" areas produce some tourist dollar benefits indirectly.

HAZARDS MANAGEMENT

Comment 93-2

On page 2-58, we note that man-made hazards vary from area to area within the planning area, and "a more detailed inventory is needed to determine the nature of these hazards (content, size, value, toxicity, etc.)." While many of these sites have been identified and barriers and signs have been posted, there were no plans noted for further study. Mitigation plans should be identified in the Final Plan/EIS regarding human health and safety and the identification of additional hazardous areas, including abandoned mine shafts which are expected to be in the area.

Response

Mitigation plans regarding human health and safety will be developed on a case-by-case basis according to resource priorities set forth in the land use plans. This will be done through site-specific Federal actions; e.g., APDs, ROWs, permits, etc. Colorado Mined Land Reclamation Board has taken the lead in determining mitigation needs and priorities in extensive mining areas (abandoned mine shafts, adits, etc.).

SPECIAL STATUS PLANT AND ANIMAL VALUES

Comment 15-2

In this locality there are occasional wetlands where the water table rises above the surface in small depressions. These wetlands include many species of plants (including Cleome multicaulis, a plant which the draft lists as one deserving special consideration) and supports many species of birds, mammals, and amphibians. To allow off-road vehicles access to these wetlands can only seriously damage them.

Response

Damage occurs to fauna through damage or destruction of nesting areas, feeding areas, cover as well as from harassment. Flora impacts can be very critical since these areas are of limited size. The plants grow in a narrow band around the perimeter of these limited areas, and the limited habitat is totally crucial. OHV use is limited to designated roads and trails or through seasonal limitations.

Comments 19-1,23-1,30-1,41-1,49-1, 62-1, 75-1,81-2,82-1,83-1,88-1,H27-2, and H31-4

I would like to suggest the addition of Elephant Rocks to the ACEC. My understanding, there are sensitive and rare plant communities which would benefit from protection.

Response

By law, BLM is required to clear all sites for sensitive plants prior to allowing surface-disturbing activities; therefore, minimal protection is provided.

Based on added information and re-evaluation of the area, Elephant Rocks will be added as an ACEC in the proposed RMP/final EIS. This designation will provide additional protection for special plant values.

Comment 91-4

We recommend at a minimum these areas be given a no surface occupancy stipulation. The plan also fails to provide protective stipulations for cultural sites, waterfowl areas, municipal watersheds, scenic vistas, and public highway viewshed. Rare, threatened and endangered species of wildlife should be inventoried and their habitat be closed to leasing.

Response

No surface occupancy (NSO) is considered a rather severe stipulation. These ACECs are identified in the draft RMP/EIS and will red flag any future action proposed. Before any action is approved, BLM is required to consult with the appropriate authorities including those listed in the plan. As far as leasing goes, the habitats are so narrow, any location can be properly determined in the APD process. The broad black-footed ferret area is suspected habitat and applies to prairie dog towns that are generally small enough that an oil and gas operation can be located to avoid potential impacts.

Comment 92-3

The BLM should consider what steps might be possible to help protect the colony of Brazilian free-tailed bats (Tadarida brasiliensis) at the Orient Mine. This is a very unique situation, the northern most known colony of predominantly male bats of this species know in the world. I realize that the land is privately owned, but it is almost totally surrounded by BLM land. The Black Canyon designation will help protect this area, at least from the east. If I read your maps correctly, woodland timber harvest would only occur to the south around Garner Creek. Seasonal use restrictions around the site would be of great benefit to protecting the roost site, say from 1 June through 31 October. This is the time period when the bats are using the mine. I would be more than happy to work with you on this subject if you agree that additional special considerations are warranted.

Response

These private lands were not identified for acquisition by BLM, and we do not have a plan to manage this bat species on these private lands or on the scattered adjacent BLM-administered tracts. Disposal of the referenced scattered parcels of BLM-administered lands probably will occur through this plan. BLM will fully support your agency's efforts to protect this colony of free-tailed bats at the Orient Mine by offering these lands to the Colorado Division of Wildlife on a priority basis. Although we do not intend to manage these small scattered tracts, we do appreciate your concern and will support your agency in blocking up these lands under your ownership in order to protect this colony of bats.

Comment 111-1

The Federal Status of Listed Threatened shown in Table 2-35 on page 2-60 of is in error. Also, its habitat description in Table 2-35 should read "ponderosa savannah with fescue grassland on deep soils over volcanic substrates."

Response

You are correct and the changes have been made. Please also see response 152-3.

Comment 127-5

The presence of a candidate T&E plant suggest that Rajadero (sic) Canyon may possess outstandingly remarkable ecological values. Id. at H-9.

Response

At present this species is not a candidate; however, we realize that new data exists that was not available from the CNAP 1986 plant inventory contract. In light of new information from public comments on the draft RMP/draft EIS, we have re-examined the ACEC relevance and importance criteria and now are proposing designation of Ra Jadero Canyon as an ACEC.

Comment 150-1

First, we believe the Draft RMP is seriously deficient in that it does not acknowledge and incorporate BLM national policy with regard to federal ESA Candidate plant and

animal species--i.e., that candidate species are to be treated for planning and management activities as if they were listed, and that Resource Areas are directed to identify and designate qualified ACECs. In the "Existing Management" alternative, Areas of Special Concern section (p.3-13), no ACECs are proposed, despite the acknowledgement that a number of sites meeting the ACEC relevancy and importance criteria exist.

Response

ACEC is an administrative designation designed to provide managers with a "flag" to indicate certain areas may require special management. There is, however, to our knowledge no BLM nor national policy that requires ACEC designation of sites that meet relevance and importance criteria. The presence of special plant species in an area does not automatically require ACEC designation. Some of the recommended sites for ACEC designation; i.e., San Luis Hills WSA, Sand Castle, Trickle Mountain, Los Mogotes, do have special plants, which would be given protective management under ACEC designation. Ra Jadero Canyon and Elephant Rocks have been added as ACECs, both of which have special plant values.

Comment 150-2

Similarly the Special Status Plant and Animal Species section (p.3-13) does not even mention candidate or state special concern list species. Based on our understanding of BLM national policy, we believe that these two sections must be revised in the Existing Management and Resource Production alternatives. This will then necessitate further revisions in summaries and tables.

Response

The words "threatened and endangered" should be replaced with "these special status," which makes the "species" mentioned range from sensitive through candidate to threatened and endangered species. The change has been made in this document.

Comments 150-4,150-5,and 150-6

Table 2-36 also contains a number of errors. The subheading "sensitive floristic communities" does not seem appropriate for all of the areas grouped within that title. The "sensitive plant association" listings use a ranking scheme no longer used by CNAP. Both footnotes are incorrect for reasons stated above. We recommend this table be omitted entirely, as it seems to add more confusion that enlightenment, or at least revised with information and terminology from CNAP. If you wish to retain Table 2-36, we could provide more detailed suggestions.

Response

Your comments are appreciated and very correct. CNAP did offer us suggestions already and we have adopted them.

Comment 150-8

As noted on page 2-42, we agree that special management is required to assure that Neoparrya lithophila habitat is not degraded. Although at present the vegetation associated with the rocks is in relatively good condition, the grassy areas among the rock outcrops are in comparatively poor condition.

Response

The "associated" vegetation condition does not necessarily point to the condition of *Neoparrya lithophila*. This area has no current use, including grazing, that would result in "poor" condition of any vegetation. Past use obviously degraded the whole ecosystem, and it is now probably in quite early seral stage. BLM contracted the species and habitat studies to CNAP. It is more likely that N. lithophila will disappear if the vegetation were to improve to a later seral stage.

Comment 152-2

Astragalus ripleyi is not listed as threatened under the Endangered Species Act at this time. It is not yet an official candidate for listing (Category 2), but will be published as such in an updated Federal Register notice due out in 1990. The second sentence under Special Status Plant Species should read: "Several federal candidate and/or sensitive plant species occur in the resource area which could become listed as threatened and endangered without appropriate management." Astragalus ripleyi is currently being considered for listing by the U.S. Fish and Wildlife Service and is the subject of a status survey by CNAP (report due out in February 1990). The national policy of the BLM with respect to candidate species is to treat them as if there listed in all planning processes.

Response

You are correct in your first and second sentences, and we will correct this error and make the change to Category 2, as in the 1990 Federal Register.

The first sentence in paragraph one, page 2-59 should read "No plant species were identified...." The plan does clearly state that clearance and consultation are required on threatened and endangered and special status plants and animals. Page 2-59 states Bureau policy and objectives; also see page 3-8, which gives management common to all alternatives.

Comment 152-3

Table 2-35. The federal status of Astragalus ripleyi is not LT, as the table indicates. The federal status should be Category 2.

Habitat for Astragalus ripleyi is: fescue grasslands near or in open ponderosa pine or pinyon-juniper woodlands on volcanic substrates.

Response

Please refer to comment 152-2 for statement two regarding habitat description. We have made the change as you state. Your update/revision of your organization's description is appreciated.

Comment 152-4

Footnotes to Table 2-35 should read:

"These ranking are provided by the Colorado Natural Areas Program (CNAP). This standardized ranking procedure was developed by CNAP to assist land managers in assessing status and management needs for plant species of special concern to the state of Colorado."

"List 1. Federal threatened or endangered plant species that are rare throughout their range, including species endemic to Colorado.

List 1*. Plant species presumed extinct.

List 2*. Plant species presumed extirpated from Colorado.

List 2. 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. Plans of limited distribution or of special interest which appear secure at this time (watch list)."

"[2]The symbols utilized in the Federal Status column (Table 2-35). . . ."

Response

Thank you for the update on the lists. Please consider the changes made as you suggested. We have corrected footnote 2 to read "Table 2-35 instead of Table 2.23-1."

Comment 152-8

"Sensitive Plant Habitats" would be more appropriate terminology for Elephant Rocks and Flat Top Mesa than "Sensitive Floristic Communities". "High Quality Plant Communities" would be preferable to "Sensitive Plant Associations".

Response

Your second suggestion has been considered, and the terminology has been changed to "High Quality Plant Communities."

Comment 152-9

CNAP no longer uses the ranking procedure developed by The Nature Conservancy for use by Heritage program (e.g., G3S2). The Colorado Natural Areas Program considers high quality remnant examples of native plant communities to be worthy of protection as representative examples of Colorado's natural environment. In some instances such plant communities may be of regional significance; in others, they are of national significance.

Response

We appreciate the updated changes to CNAP special plants report of 1986.

Comment 152-10

All footnotes from Table 2-36 should be eliminated. They are either erroneous or misleading.

Response

Thank you for your information. We have corrected the erroneous footnotes; however, they have been retained because we believe it is appropriate to list the information source.

Comment 152-11

For the contents of the lower portion of Table 2-36, we suggest the following:

Special Vegetation Resources	Status
Southern Rocky Mountain Lower Montane Grasslands examples: Arizona fescue-mountain muhly; Arizona fescue-slim muhly; winterfat/Indian ricegrasss	further study
Southern Rocky Mountain Lower Montane Woodlands examples: bristlecone pine/Arizona fescue-mountain muhly	further study
Ponderosa pine woodlands examples: ponderosa pine/Arizona fescue-mountain muhly	further study
Pinon-Juniper Woodlands examples: pinon pine-Rocky Mountain juniper	further study

Response

Thank you for updating us on your new treatment of sensitive plant associations (this title has been changed to "High Quality Plant Communities"); please see comment 152-8.

Comment 152-12

High quality examples of these plant communities may be found in Trickle Mountain/Sheep Creek, East Creek, and Flat Top/San Luis Hills areas. Evaluations of these plant communities should be conducted to ascertain their condition. Historical grazing practices have significantly altered native grasslands and the native understory in woodland communities throughout the San Luis Valley and the semi-arid western United States, rendering high quality relictual vegetation areas of regional as well as national significance.

Response

We appreciate your comments. Vegetative monitoring will be implemented through activity plans; i.e., allotment management and habitat management plans.

Comment 152-14

The phrase "plant associations" should be changed to "plant communities". Who makes the "necessary" determination of inventory and monitoring needs for special status plant and animal species? The specific criteria that will trigger the "necessary" determinations should be defined.

Response

Your suggested change of "plant associations" to "plant communities" on page 3-8 has been made in Chapter 1 of the proposed RMP/final EIS.

The area manager, in conjunction with the agencies listed on page 3-8 of the draft RMP, would determine the level of inventory and monitoring necessary for proper management. Criteria will also be defined by the area manager in consultation with the listed agencies.

Comment 152-15

The existing management alternative provides for designation of no ACECs and no attention is paid to candidate or state list plant species. This is not in keeping with present national policy within BLM which provides for treatment of candidate species as if they were listed (v. paragraph 1, page 2-59 and topic 1, page A-4), nor with the national directive for Resource Areas to identify and designate qualified ACECs.

Response

ACEC is an administrative designation designed to provide managers with a "flag" to indicate certain areas may require special management. There is, however, to our knowledge no BLM nor national policy that requires ACEC designation of sites that meet relevance and importance criteria. The presence of special plant species in an area does not automatically require ACEC designation. Some of the recommended sites for ACEC designation; i.e., San Luis Hills WSA, Sand Castle, Trickle Mountain, Los Mogotes, do have special plants, which would be given protective management under ACEC designation. Ra Jadero Canyon and Elephant Rocks have been added as ACECs, both of which have special plant values.

Comment 152-17

Astragalus ripleyi should receive special management wherever it occurs within the resource area, and the proposed Ra Jadero Canyon ACEC should be managed with protection and enhancement of A. ripleyi populations as the top priority.

Response

At present this species is not a candidate; however, we realize that new data exists that was not available from the CNAP 1986 plant inventory contract. In light of new information from public comments on the draft RMP/EIS, we have re-examined the ACEC relevance and importance

criteria and now are proposing designation of Ra Jadero Canyon as an ACEC.

Comments 152-18 and152-22

The wording in this section of the plan does not reflect national policy of Bureau of Land Management with respect to candidate plant and animal species, i.e., candidate species are treated as if they were listed in all planning and management activities. The language in this section should be revised to reflect national policy (v. paragraph 1, page 2-59 and topic 1, page A-4).

Response

The draft plan does clearly state that clearance and consultation are required on threatened and endangered and special status plants and animals. Page 2-59 states Bureau policy and objectives; also see page 3-8, which gives management common to all alternatives.

OTHER COMMENTS

Comment 1-1

Mission requirements, fuel costs, and environmental constraints all contribute to decisions made in locating a military training activity. Because of general aviation and population pressures, low altitude, high speed flights are relegated to those areas least accessible and sparsely inhabited. Therefore, we request that you give full consideration to how planning and management decisions might adversely affect the use of low altitude airspace by the Air Force. We believe unrestricted military use of these routes is essential for training and combat effectiveness.

Response

The bulk of BLM-administered lands will not be affected by flight maneuvers; however, lands that lie adjacent to USFS lands recommended for wilderness will be. Flights should avoid these areas, which are on the western slope of the Sangre de Cristo Mountains.

Comment 15-7

The State of Colorado and the Bureau of Reclamation are developing San Luis Lakes and surrounding locale for recreation. It would be practical and expedient to develope off-road vehicle trails there in conjunction with these activities to replace those proposed at Sand Castle.

Response

Yes, the Colorado Division of Parks and Outdoor Recreation is developing facilities for camping, picnicking, fishing, etc., around the Sand Castle site. It seems logical that these would include some off-highway vehicle riding trails and sites adjacent to the lakes areas. Because the public expressed support for the protection of the significant ecological and cultural values in the Sand Castle area, BLM is not pursuing the development of a portion of the unit as an off-highway venicle play area. The unit is designated as limited with OHV use limited to designated roads and trails only.

Comment 25-1

Accordingly, I feel that a 20-year plan for BLM lands must deal with this adverse condition of drought.

Response

The draft does address drought, and overall climatic conditions will be considered in site-specific actions (see Climate pages 3-1 and 3-2). Existing regulations also allow the manager to make adjustments necessary because of drought (e.g., allowing grazing nonuse, requiring stocking reductions, etc.)

Comment 71-1

You do not pay attention to existing scientific data in regard to ecology and resource management.

Response

Existing inventory/scientific data used to determine management decisions in the draft RMP is documented in the management situation analysis (MSA), which is available for review in the Cañon City District Office and the San Luis Resource Area Office.

Comment 91-6

The plan failed to look at a variety of alternatives. In each alternative only 0.5% of the lands are closed to oil and gas leasing.

Response

In analyzing the options, the question was asked: Is "no leasing" needed to meet the objectives identified for a given alternative? If other less restrictive constraints would meet the objective, they were used. This is consistent with the multiple use mandate of BLM. Additional information is in

our response to Comment 145-2 in this section for more discussion concerning mineral development.

Comment 91-9

The plan fails to provide any real alternatives with regards to locatable minerals and minerals materials.

Response

A suitable range of alternatives was addressed in Table S-1. In considering alternatives, analysis was presented to determine if mineral withdrawals were totally necessary to meet the overall objectives of the plan. If a withdrawal was not needed to meet the objectives (i.e., other designations or constraints would work), it was not imposed. Nevertheless, nearly 20,000 acres were recommended for withdrawal in the Natural Resource Enhancement Alternative (NREA) and only 3,300 acres recommended in the Resource Production Enhancement Alternative (RPEA). Concerning mineral materials, 16 percent was recommended closed in the NREA and only 1 percent in the RPEA.

Comment 91-32

The BLM must do a more thorough job in addressing consequences of these decisions. If a management decision is going to have adverse impacts on the resources that the agency wants to protect, then changes in the plan should occur.

Response

Adverse and beneficial consequences are addressed and analyzed in Chapter 4 of the draft RMP. Depending on the alternative, enhancement of different resources is emphasized; however, under multiple use management BLM is mandated to attempt to achieve a balance of resource management and still comply with various policies and regulations. The Preferred Alternative presents a range of decisions to ensure sound management.

Comment 95-1

I recommend that, in order to mitigate the already existing problem from recreational use, the preferred alternative de-emphasize recreation and place more emphasis on upgrading the existing natural resources through wildlife habitat enhancement, riparian zone protection and minimum flow studies.

Response

We are obligated to provide recreation opportunities, and it should not be to the detriment of other resources. With balanced, sound management of all resources, no one resource should impact other resources to the point of detriment. BLM believes this goal is accomplished in the PRMP.

Comments 112-1,130-1, and 145-2

We recommend the Natural Resource Enhancement Alternative (NREA) for its stipulations which safeguard other resources, as the document states. Mineral development, in the short or long term, becomes a dominant land use situation, having great effects on other resources and the land base. This necessitates greater protection and mitigation for those resources than the Preferred Alternative (PA) provides.

Response

The recommendation is noted; however, the analysis completed in the draft RMP identifies the Preferred Alternative as the most reasonable and implementable alternative to achieve the Bureau multiple use mission. For the most part, the special stipulations applied within the Natural Resource Enhancement Alternative of the draft RMP/EIS are very similar to those applied to the Preferred Alternative. Of course the standard stipulations shown in the appendix apply equally throughout all alternatives.

Comment 123-1

Nevertheless, the Preferred Alternative appears to constitute a good mix of uses while still allowing for reasonable access to explore for and produce energy resources.

Response

Thank you for your comment. We believe the Preferred Alternative is a reasonably sound mixture of resource uses.

Comment 132-8

We urge that you seriously consider a more intensive RMP than the Preferred alternative.

Response

We appreciated your comments. The BLM planning process includes three tiers of which this RMP is the second. The third tier includes the site-specific management prescriptions. Intensive management must be realistic and based on future funding.

Comment 145-1

One wish that we have for future plans is that plan maps, especially the base map, show more physiographic features, in addition to the political already represented. This would facilitate our analysis of management, resources and increase public education of the lands.

Response

Three maps in the back of the proposed RMP/final EIS present more information on physiographic features, which should better orient the reader.

Comment H26-6

I sent a comprehensive letter we would like to see included, in March 1988, because the plan failed to address many of our concerns.

Response

We did take your earlier letter into consideration during scoping and development of the ACECs. Most of your points are very similar to your comment letter on the draft RMP/EIS. We believe at this time we have addressed all of your comments and have thoroughly responded to them in the proposed RMP/final EIS. We do appreciate your very comprehensive comments.

CHAPTER 3
THE PROPOSED RESOURCE MANAGEMENT PLAN

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This proposed plan has portions of the original four alternatives, especially the Preferred Alternative, within the draft RMP/EIS. Also included are changes resulting from the comments received during the public review process on the draft. The resource area is divided into 10 geographic reference areas (GRAs) as shown on the maps inserted in the back of this document.

This discussion and the discussion under San Luis Area GRA #1 are equivalent to the Management Common to All Alternatives section in chapter 3 and the Preferred Alternative in the draft RMP/EIS. This section describes the base line decisions for the entire resource area and for the most part refers very specifically to each of the GRAs. Decisions within area #1 also are relevant to the other nine geographic reference areas unless specified otherwise within that particular GRA. Total acreage figures are in the Summary and chapter 1 of this document.

The decisions within this proposed plan are organized into 10 GRAs and are displayed by resources/resource uses and by one of the following three decisions:

1. Resource Condition Objective (RCO): The desired state (condition) BLM would like to achieve for environmental values and social/economic conditions (resource) affected by BLM management activities and resource conditions (objectives) in a specific geographic location.

2. Land Use Allocation (LUA): The allowable, limited, or excluded uses (allocations) for a specific geographic location or area and the terms and conditions of such use.

3. Management Action (MA): The specific action/direction BLM will take to achieve RCO/LUA decisions

The objective of this resource management plan is to provide a variety of levels, methods, and a mix of multiple use resource management, utilization, and protection. Management decisions are based on current policies, regulations, and the specific resource conditions, allocations, and management actions described in this plan. In the back of this document are four large fold-out maps, which depict the decisions presented in this chapter.

BLM lands and resources will continue to be managed to provide needed commodities and uses (e.g., livestock grazing, mineral materials sales, etc.) to assist in the support of local and regional economies. Generally, management practices and prescriptions will favor maintaining or enhancing the natural setting (e.g., wildlife habitat, visual resources, recreation areas, etc.). Specific emphasis will be to enhance dispersed recreation opportunities, wildlife habitats, and related values (e.g., riparian, recreation) and uses. Necessary constraints, stipulations, and mitigating measures will be included to protect these resources from irreversible damage.

MANAGEMENT GUIDANCE COMMON TO ALL AREAS

The management guidance common to all GRAs described in this section by resources and resource uses are not carried into the specific decisions in the GRAs. They are, however, of significant concern to the Bureau.

In most cases, the common measures described for these resources and resource uses reflect Bureau policies and regulatory mandates and, therefore, will be the same throughout the plan. Some resources and resource uses may be partially discussed both in this section and under the GRA discussions as specific decisions.

Climate

Climatic variability throughout the planning area, and over time, affects the management options for several resources. Climatic conditions will be monitored and analyzed when appropriate. For example, rangeland vegetation condition assessments will analyze both climatic and grazing management, and mineral development plans will analyze both climatic and mineral development reclamation.

Air Quality

Air quality degradation will be minimized through strict compliance with Federal, state, and local regulations and implementation plans. For example, air quality impacts from prescribed burns are limited by BLM Manual 7723 (Air Quality Maintenance Requirements), which requires a state-approved open burning permit prior to implementation. These impacts will be small in scale and dispersed throughout the planning area. Increasing off-highway vehicle (OHV) use in open areas might accelerate soil

erosion and increase fugitive dust emissions; however, dust suppression control devices would not be practical. Additional management activities include monitoring, analysis, and impact mitigation on a project-specific basis, which will ensure compliance with applicable regulations and implementation plans.

Soils

Surface-disturbing activities, including grazing, mineral development, forest and woodland harvest, and OHV use, might cause a very slight loss of watershed values throughout the planning area during the life of the plan. Allotment grazing adjustments and standards with stipulations for other resource actions will decrease erosion and potentially enhance watershed characteristics for a net watershed value increase. Construction of transmission and communication facilities in designated utility corridors and communication sites might adversely affect soil on a short-term basis with very insignificant effects overall.

Water Resources

Legal rights through the state water court system will be acquired to use water in support of BLM programs, including the water needs of BLM recreation areas and sites, commercial and concession facilities, special plant and animal habitat areas, state and local government recreation and public purposes lease areas, livestock management allotments, and wildlife habitat areas.

Water quality will continue to be maintained or improved in accordance with state and Federal standards. BLM will consult the appropriate state agencies on proposed projects that could significantly affect water quality. Management actions on BLM-administered land within municipal watersheds will continue to be designed to protect water quality and quantity.

The Bureau water use inventory and water rights program within the planning area will continue to be implemented. As new projects are completed and old ones are maintained, re-evaluating and updating will be required.

Monitoring selected ground water and surface water stations will be continued in cooperation with USGS. Potential impacts to surface water resources are not as critical nor probable as to ground water resources.

In the event that reaches of the lower Rio Grande River are designated for special management under the *National Wild and Scenic Rivers Act*, no Federal claims for instream flows are anticipated; however, an implicit Federal reserved water right is in the Act. Existing stream conditions are sufficient to satisfy the needs of any special management designation. Pending future designation, BLM may have to quantify needs and file in state water court.

Watershed activity plans will be developed and implemented on areas where livestock grazing plan adjustments will not fully correct any determined water quality problem. Cooperative management within the range program and the watershed program in the development, implementation, evaluation, and modification of AMPs as affected by watershed values will continue as a top priority.

Monitoring and evaluation of water quality and quantity, as well as control of erosion and sediment production, will remain high priority management goals. Emphasis will be to continue all watershed activities that provide protection, maintenance, and enhancement of the watershed resources, including the support provided to other resource programs and activities.

The BLM in Colorado will continue to take an active role in the control of nonpoint source pollution on public lands. BLM is an active participant on the state of Colorado Nonpoint Source Taskforce and Agriculture/Silviculture Subcommittee. Through these organizations, BLM will identify nonpoint source pollution areas for the updating of the Colorado Nonpoint Assessment Report. It is the policy of BLM to protect, maintain, restore, and/or enhance the quality of waters on public lands. The implementation of best management practices will be utilized to help achieve this goal. Funds will be requested for planning and project implementation for nonpoint source control with emphasis placed on the priority watersheds identified in the Colorado Nonpoint Source Management Program report. Nonpoint source control projects will be implemented as funding and manpower allow.

Geology, Topography, and Minerals

Federal oil, gas, and geothermal mineral estate on both Federal and split-estate lands (Mineral Decisions Map in back of this document) will be open to leasing under standard lease terms with the exception of the following nondiscretionary closures:

1. Fluid mineral estate (320 acres) within the incorporated town of Del Norte, Colorado.

2. Fluid mineral estate (16,794 acres) within the wilderness study areas (WSAs) are closed to oil and gas leasing in accordance with section 43 of the *Federal Onshore Oil and Gas Leasing Reform Act* of 1987 pending a final determination by Congress as to suitability for inclusion into the wilderness system. The recommendation of the Cañon City Final Wilderness EIS and the U. S. Forest Service study identifies 3,300 acres as suitable for recommendation as wilderness. The remaining 13,494 acres were recommended for return to multiple use management and, therefore, are

assumed to be subject to the applicable leasing decisions of this plan. No lands within a WSA, however, will be considered for lease pending a final determination by Congress.

Wilderness designation of 3,300 acres of BLM lands contiguous to the Rio Grande National Forest will withdraw these lands from all forms of minerals appropriation subject to valid existing rights in accordance with Section 4(d)(3) of the *Wilderness Act*. Such designation will not result in any significant impacts to mineral resources because of the low mineral potential of these particular lands.

Other conditions for leasing, such as no surface occupancy (NSO) and seasonal stipulations, shown in Appendix C, are assigned as required by the management prescriptions; these special stipulations will apply to Federal surface and split-estate lands. The following fluid mineral estates will be subject to a no surface occupancy stipulation:

1. The unincorporated town of South Fork, Colorado (40 acres).

2. The park site under recreation and public purpose (R&PP) lease to the city of Monte Vista, Colorado (360 acres).

3. A portion of the Pike Stockade State Historic Park (840 acres).

These lands and improvements have been determined to be incompatible with any form of surface use by fluid mineral operations.

Resource information for fluid mineral estate, on which recommended stipulations are based, will be verified during review of applications for permit to drill (APD). Onsite inspection and consultation among BLM, surface owner, and operator may reveal that (1) the impacts addressed by the stipulation will be avoided and/or mitigated to an acceptable level or (2) the resources of concern are not present. Based on either of these determinations by the authorized officer (A.O.), the stipulations can be waived, modified, or excepted without public notice other than that required in the APD process. Consultation with the private surface owner for split-estate lands will provide for consideration of private use of the surface to the fullest extent possible. If, after onsite inspection and consultation, the A.O. determines that conditions necessary to avoid impacts to private resources will adversely impact the public resources addressed by the lease stipulation, such impacts will be assessed. If, based on such an assessment, the A.O. makes a decision to substantially change or waive one or more stipulation, a 30-day public review period will be provided in addition to the public notice period required under normal APD review process.

Based on past exploration and future projections concerning fluid mineral activity, the reasonably foreseeable level of development within the planning area will involve a maximum of 10 APDs and 7 geophysical notice of intents (NOIs) per year. This level of activity will result in an estimated 40 acres of surface disturbance per year. A description of the typical fluid minerals operation and standard operating practices employed in the SLRA is provided in Appendix C and the Oil and Geothermal Technical Report.

Vegetation

Overall objectives will be to move toward good condition (late seral stage) based on site potential using grazing management. If necessary, vegetation manipulation practices or other techniques will also be used to aid in accomplishing this. Specific desired plant communities will be described in activity plans, if necessary, and in most cases will be a diverse community of grasses, shrubs, and forbs.

Overall trend, condition, and forage production will be expected to improve. Soil-disturbing activities will be mitigated with standard operating practices for rehabilitation of disturbed sites and grazing allotment adjustments. Manipulation of vegetation, although not proposed, will involve mechanical, chemical, and fire practices. Site-specific planning and any needed NEPA documentation will be accomplished if a proposal were made during the life of this land use plan. Ecological site determinations will be completed for the planning area, which will include site-specific vegetative resource measures for all resource actions. Maintenance, improvement, and/or replacement of the vegetation resource would continue to be a priority concern in all actions.

Livestock Grazing Management

Overall livestock grazing management reflects the 1978 San Luis Grazing Environmental Statement, which this document replaces. Livestock grazing will be managed on the 149 allotments or approximately 474,000 acres currently being grazed, and approximately 32,400 AUMs will be authorized annually for livestock use on these allotments. Adjustments in the actual AUMs will be authorized and made when climatic or other conditions warrant a temporary increase or decrease in livestock use. Temporary livestock grazing will be allowed, pending an environmental assessment (EA), on any newly acquired lands.

Presently there are approximately 42,000 acres unallotted to livestock grazing of which approximately 13,000 acres are presently considered unsuitable. Livestock grazing will be allowed on suitable lands as needed or requested. Other uses and conflicts will be considered prior to authorizing use. Lands considered unsuitable for grazing are shown on Map 2-7 of the draft RMP/EIS.

The 36 allotment management plans (AMPs) not implemented will continue to be reviewed and implemented as appropriate. The 59 AMPs currently fully implemented will be continued as necessary to meet present and future objectives.

Typical range improvements are listed in Appendix D of this document. The extent, location, and timing of such improvements are described in AMPs. The highest priority for implementation generally will be assigned to those improvements for which total anticipated benefits exceed costs. Funding would be from contributions from various sources including operators and BLM.

New range improvements will be constructed if needed to achieve AMP objectives and/or implement the grazing management programs prescribed in the AMPs. Manipulation of vegetation can be used if needed to meet management objectives.

All grazing allotments in the planning area have been assigned to one of three management categories. The "M" category allotments generally will be managed to sustain current satisfactory resource conditions; "I" allotments generally will be managed to improve resource conditions; and "C" allotments will receive custodial management for existing resource values. These categories are based on the allotment resource characteristics, potential opportunities, and needs. Appendix D of this document shows the specific allotments and categories. Allotments may be moved from one category to another as new information becomes available, resource conditions change, or management activities are implemented. Changes will be documented showing the basis for the change.

Monitoring studies will be continued or established on all allotments. Allotment categorization will determine the monitoring intensity with the "I" category receiving the highest intensity of monitoring studies. The specific type of studies will be determined by the AMP objectives. As a minimum, condition and trend studies will be established in accordance with the *Public Rangeland Improvement Act* of 1978.

If monitoring studies show that livestock use changes are necessary to achieve established management objectives, corrective action will be taken. Livestock use adjustments are most often made by changing one or more of the following: class of livestock, season of use, stocking rate, or the grazing management system. Although most livestock use adjustments will occur in the "I" allotments, use adjustments could occur in the "C" and "M" allotments. Changes can be made with an EA and AMP revision.

Types of grazing systems to be implemented are described in Appendix D of this document and are normally implemented by an AMP; however, they might be incorporated in a coordinated resource management activity plan (CRMAP). AMPs are generally prepared in consultation, cooperation, and coordination with the permittee and other affected interested parties to meet multiple use and land use plan objectives. Permittee requested changes on current grazing management could be made with an EA.

Wildlife and Fish Habitat Management

All BLM lands (520,677 acres) will be considered for protection and enhancement of wildlife habitat values. Monitoring of the Blanca and Trickle Mountain Habitat Management Areas and crucial big game winter range, birthing areas, and raptor sites will continue.

Existing stream fisheries will be maintained. Improvements in condition and stability will be accomplished through the riparian programs where the potential exists. Cooperative agreements for wildlife habitat management projects will be pursued with other state and Federal agencies and other interested individuals.

Supplemental releases and re-introduction of native or naturalized fish and wildlife species (excluding Federal or state listed endangered, threatened, candidate, or sensitive species) could be authorized by the manager following environmental analysis.

Lands and Realty Management

Lands actions (e.g., sale, exchange, recreation and public purpose leases, etc.) on BLM-administered lands are generally initiated by the public and on an infrequent basis. Most of these lands in the SLRA (see Realty Action Decisions Map in the back of this document) are in large blocks and have important resource values. Most of these lands, therefore, will continue to be administered by BLM, and only a small portion will be considered for disposal.

Lands have been placed in two categories:

Category I lands will be disposal tracts. These tracts (5,300 acres) are shown on the Realty Action Decisions Map in the back of this document. Although these lands meet the criteria for public sale consistent with the provisions of Section 203 of FLPMA, other methods of disposal will not be precluded. Land acquisitions will generally not be considered in these areas.

Category II lands will be available for disposal on a case-by-case basis for the purpose of minor boundary adjustments on lands administered by BLM, enhance public resource values, state indemnity selections, *Recreation and Public Purposes Act* applications, or other appropriate statutory authority, if disposal serves the national interest. Land ac-

quisitions will be considered in these areas; however, land exchanges are the preferred method for ownership adjustments. Exchanges will be considered in these areas if the exchange results in a consolidated land ownership pattern, improved manageability of natural resources, or otherwise will be in the public interest. All land actions in this category will be consistent with the provisions of FLPMA.

Acquisition of lands will also result in a consolidated land ownership pattern, improved manageability of natural resources, protection or enhancement of sensitive resources (e.g., special plant and animal values, crucial wildlife winter range, riparian areas, public commercial timber, grazing, minerals, etc.), and enhancement of other BLM-administered land values. Acquisition zones (Realty Action Decisions Map in the back of this document) are non-Federal land and have been identified for acquisition only from willing landowners or agencies by exchange or purchase at fair market value to satisfy public interests previously noted.

Wilderness Management

The WSAs will be managed under BLM Interim Management Policy and Guidelines for Lands Under Wilderness Review (IMP) until Congress makes a decision on wilderness recommendations in the Cañon City District. In accordance with Section 603 of FLPMA, BLM is required to manage all identified wilderness study areas under the nonimpairment mandate. This mandate restricts any uses/development of the WSAs, which would make them unsuitable for wilderness designation. Valid existing rights must be recognized and are an exception to the nonimpairment mandate. Those grazing, mining, and mineral leasing uses existing when FLPMA was approved on October 21, 1976, may continue in the same manner and degree as on that date, even if the use will impair wilderness suitability.

Mining operations occurring as of October 21, 1976, may continue in the same manner and degree as long as they do not cause unnecessary or undue degradation. Mining operations proposed after this date, however, are subject to the nonimpairment requirements for all operations proposed.

An interagency agreement between the U.S. Forest Service (USFS) and BLM dated February 20, 1981, provided for the joint study of adjoining areas and designated the USFS as the lead agency in the study. A proposal has been made to Congress recommending 3,300 acres of contiguous BLM wilderness study areas (Black Canyon, South Piney Creek, Papa Keal, and Zapata Creek WSAs) suitable for wilderness designation. In the event that Congress releases any of these areas from further wilderness consideration, management prescriptions identified in this plan will be followed.

Two other designated BLM WSAs (Sand Castle and San Luis Hills) will be managed in accordance with BLM and congressional directives. These WSAs, which are not recommended by BLM for wilderness designation in the Final Cañon City District Wilderness Environmental Impact Statement dated December 1987, would be returned to other multiple use management, as ACECs, if released by Congress from further wilderness consideration.

Access and Transportation Management

At the time the RMP is implemented, access and transportation services will be planned in detail as a portion of an area-wide support services management plan (SSMP). Four-wheel drive use will be limited seasonally on 25 roads to protect muddy nonsurfaced roads. The specific differences in numbers, kinds, and lengths of transportation developments and exact locations and sizes of access needs cannot be described until the SSMP is complete. This plan will detail roads, trails, engineering requirements, acquisition, withdrawals, points of access, etc., for final land use plan implementation. Specific access and transportation decisions, therefore, will not be presented.

Historical Resources

All 39 historical sites will receive minimal legal protection. Historical resources will be inventoried as appropriate, and clearances will be conducted on all sites with any proposed surface-disturbing activities. Measures designed to protect 18 significant historical resources will be required in all land use activity plans. The Cumbres and Toltec Scenic Railroad, a National Register of Historic Places (NRHP) site, will receive special protective management.

Fire Management

Any fire, including wildfires, occurring in the resource area will be suppressed. No conditional suppression areas with special fire condition values, such as ACECs or SRMAs are considered in this plan. This fire management decision has been carried into the RMP because of the extremely low historical fire occurrence and the low intensity of wildfires in the the planning area (i.e., 1.7 fires per 10-year period and less than 1.6 acres in size). This full suppression does include the wilderness study areas, areas highly susceptible to soil erosion, special plant and animal management areas, and areas of critical environmental concern within the resource area. This decision is consistent with the Cañon City District Fire Management Activity Plan. The activity plan will be evaluated annually to determine whether or not changes are needed.

Prescribed burn plans and necessary NEPA documentation will be written for areas requiring visual landscape or vegetation manipulation; however, no specific areas are identified at this time.

Hazards Management

Hazard sites/areas will be reviewed on a case-by-case basis. Management of other resources will always involve the needed reclamation of known hazard sites/areas as part of fulfilling objectives for management of that resource. On completion of this plan, hazard reclamation activities for known sites/areas will be developed as a portion of the area-wide support services management activity plan. If the known hazard site is in or adjacent to an area where a coordinated resource management activity plan (CRMAP) is to be done, the reclamation activity plan will be combined with that CRMAP.

Sites/areas from past mineral development, potentially hazardous because of high side walls, deep pits, etc., will probably remain 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, and BLM will continue to fully cooperate with this agency in this effort.

The Bureau will continue to control trespass dumping on BLM lands through increasing public awareness, signing, and monitoring. These reclamation activities will be detailed in the area-wide support services management plan and will provide the specifics as to onsite closures, signing, site reclamation needs, etc., to implement hazard abatement.

Special Status Plant and Animal Species

Threatened and endangered species and sensitive species and plant communities will be inventoried and monitored as necessary to provide information for proper management.

Supplemental releases and reintroduction of Federal and state listed endangered, threatened, candidate, and sensitive species will be enacted following environmental analysis and consultation with the U.S. Fish and Wildlife Service (USFWS), the Colorado Division of Wildlife (DOW), Colorado Natural Areas Program (CNAP), and other affected parties.

Waterpower/Storage

Those potential waterpower/storage reservoir sites under a land withdrawal will continue to be maintained for waterpower values. The exception will be the waterpower/storage site withdrawals within the 22-mile portion of the Rio Grande River Corridor, which was determined eligible and suitable for wild and scenic river designation. These withdrawals are recommended for termination if this portion is designated wild and scenic by Congress.

Before any uses will be allowed that might endanger waterpower values, an engineering evaluation will be prepared to determine whether the land has waterpower value. A letter will then be sent to FERC requesting their concurrence to modify or terminate the withdrawal to allow for compatible uses.

Potential sites not presently withdrawn will be identified and restrictively managed for waterpower/storage sites. Unnecessary uses that might endanger the waterpower or reservoir values will be avoided. Before any uses will be allowed that might endanger the waterpower or storage values, the Federal Energy Regulatory Commission (FERC) will be contacted to determine whether the site is still not withdrawn. Sites will continue to be identified, investigated, evaluated, and recommended for withdrawal as needed.

DECISIONS

San Luis Area #1

Area #1 includes all areas not designated as an area of special concern.

This area includes all BLM-administered surface lands (389,297 acres) and subsurface lands (489,620 acres) outside the other nine areas.

Minerals

Resource Condition Objective Decisions

1-1: Application of seasonal stipulations on approximately 342,000 acres from December 15 to March 31 of each year to protect big game crucial winter range and eagle wintering areas throughout the planning area. Seasonal stipulations will apply from May 15 until July 15 on antelope birthing areas. Operations might be allowed in seasonally limited areas during these periods if no more than minimal disturbance to wildlife would occur.

1-2: Application of seasonal limitations could be incorporated into authorizations, if necessary, to protect waterfowl nesting areas.

Land Use Allocation Decisions

1-1: Oil and gas operations would not be allowed in riparian zones.

1-2: Federal oil, gas, and geothermal resources on 487,620 acres or 99.7 percent of BLM-administered lands or mineral estate will be open to leasing. No surface occupancy (NSO) stipulations will protect 1,200 acres within the Pike Stockade/Monte Vista park areas, 560 acres of eligible NRHP sites, and 40 acres of the unincorporated town of South Fork.

1-3: Federal mineral estate on approximately 483,980 acres (99 percent) will be open to entry and location. Mineral entry will be precluded on 1,200 acres within the Pike Stockade/Monte Vista park areas, 200 acres of U. S. Forest Service administrative sites, and 560 acres of eligible NRHP sites.

1-4: Federal mineral estate will be open on 486,240 acres (99 percent) and will be available for disposal of mineral materials except in riparian zones.

Management Action Decisions

1-1: Require plan of operations for mineral development except casual use in the following locations: a) areas closed to OHV; b) acres designated for potential addition to or actual components of the national wild and scenic river site; c) designated areas of critical environmental concern (ACECs); and d) areas withdrawn from operations of the mining laws in which valid existing rights are being exercised.

1-2: Continue to inventory mineral material disposal resources and develop appropriate common use areas and community pits.

Paleontological Resources

Land Use Allocation Decision

1-5: A collection area for invertebrate fossils near Clayton Cone will be identified and coordinated with the recreation program.

Management Action Decisions

1-3: Complete a site-specific management plan for the collection area near Clayton Cone. An area-wide surface-disturbance development plan will be completed.

1-4: Continue to inventory paleontological resources and develop appropriate protective measures/stipulations for surface-disturbing proposals.

Riparian Resources Management

Resource Condition Objective Decisions

1-3: Maintain approximately 1,400 acres of riparian zones in good to excellent condition and improve condition on 455 acres.

Protection measures will include, but are not limited to, 1) mitigation of impacts from rights-of-way and utility corridors adjacent to or that cross riparian areas; 2) provision for no disposal of mineral materials in riparian zones; 3) limited OHV designations in riparian zones.

Enhancement measures will include, but are not limited to, 1) increased emphasis on the acquisition program and allow no disposal of riparian areas except through land exchanges; 2) modified allotment management plans (AMPs) to increase emphasis on riparian resources; and 3) management of the riparian resources in the Blanca WHA to continue primary emphasis on wetlands management and waterfowl production.

Management Action Decision

1-5: Complete an inventory on an additional 1,413 acres with potential riparian values. If riparian values are present, the resource will be managed according to Resource Condition Objective 1-3.

Vegetation

Resource Condition Objective Decisions

1-4: Maintain the present good to excellent range condition; move toward good condition (late seral stage) on the fair to poor condition range based on site potential. Specific desired plant communities will be described in activity plans, if necessary.

1-5: Allow vegetative manipulation such as mechanical, chemical, or fire practices to aid in accomplishing the overall objective and the desired plant communities described in activity plans.

Management Action Decision

1-6: Continue the ecological site inventory to provide data for existing ecological status and trend and aid in developing

vegetative objectives and desired plant community descriptions for activity plans.

Livestock Grazing Management

Resource Condition Objective Decisions

1-6: Continue the 59 fully implemented AMPs, if necessary to meet present and future objectives, and continue to review and implement the 36 allotment management plans not implemented.

1-7: Provide 40 percent of increased forage production to livestock grazing and 60 percent, if needed, to nonlivestock uses and needs (e. g., wildlife, riparian, watershed, soils, etc.).

1-8: Monitor all grazing areas and take appropriate methods to accomplish the following:

1. Enhance riparian values in applicable allotments through proper livestock management.

2. Ensure that livestock use will be appropriately managed to enhance the affected habitat where special status plants and animals are present.

3. Ensure that other RMP objectives will be met in other allotments.

1-9: Allow livestock grazing year around based on the following criteria:

1. Objectives of the AMPs, HMPs, CRMAPs, etc., are met.

2. No conflict with crucial wildlife use or conflict can be mitigated.

3. Early spring use (3/1 to 4/30) could be allowed for special management prescriptions.

Land Use Allocation Decisions

1-6: Continue authorizing approximately 32,400 AUMs annually for livestock grazing on the existing grazed allotments or approximately 474,000 acres. Refer to the draft RMP/EIS and Appendix D, Table D-1 in this document for specific allotments.

1-7: Consider allocating 1,500 AUMs for livestock grazing in the presently unallotted acres (approximately 30,000 acres) that are suitable for grazing (see Map 2-4, draft RMP/EIS).

Management Action Decision

1-7: Construct new range improvements, if needed, to achieve AMP objectives and/or implement the grazing programs prescribed in the AMPs. Manipulation of vegetation will be used, if needed, to meet management objectives.

Wildlife and Fish Habitat Management

Resource Condition Objective Decisions

1-10: Manage the wetland component of the riparian system in a good to excellent condition.

1-11: Manage streams to maintain the fisheries potential.

1-12: Provide special management to improve the present acres of wetlands in the Mishak Lakes and Dry Lakes areas to the historical acres of wetlands.

1-13: Maintain 48,500 AUMs for big game. Crucial winter ranges will be managed to sustain available winter forage for 17,600 big game animals.

1-14: Plan implementation of construction projects for other resource management programs at times of the year compatible with wildlife.

Land Use Allocation Decision

1-8: Seasonal use limitations will be considered if needed on water bird nesting habitat associated with wetlands. Seasonal limitation could vary from year to year, depending on target species.

Forest and Woodland Management

Resource Condition Objective Decisions

1-15: Meet crucial thermal and cover requirements for wildlife during harvest of productive forest lands and operable woodlands.

1-16: Allow small timber operations (i.e., 80 acres or less) during the winter months provided there will be only minimal impacts to wintering big game herds. The impact analysis for proposed timber sales will consider not only BLM-administered lands, but also adjacent USFS lands with approved prescriptions in the Rio Grande Forest Management Plan.

1-17: Harvest 185 Mbf from a total of 5,769 acres of operable commercial forest lands annually during the life of

the plan. Thirty-four acres of CFL will be replaced annually through regeneration harvest. Harvest 477 cords of fuelwood (11,992 acres of productive operable woodlands) during the life of the plan or 53 acres annually.

Land Use Allocation Decision

1-9: Allow harvesting in any area consistent with activity plans and RMP decisions.

Lands and Realty Management

Resource Condition Objective Decisions

1-18: Establish priority for access using the following criteria:

1. Access easements that will jointly benefit BLM and other resource agency programs.

2. Access needs identified in coordinated resource management activity plans (CRMAP).

3. Scenic/recreational access easements along river corridors for recreation, wildlife, riparian, and other resource values.

4. Other access needs based on the following: a) resource values (quantity and quality); b) potential for closure to the public; c) resource conflict mitigation; d) public demand and BLM administrative needs; e) configuration (size, shape and amount of public land); f) proximity to population centers; and g) proximity to major travel routes.

1-19: Promote maximum utilization of existing ROWs, including joint use when possible.

1-20: Emphasize retention and management of the majority (probably more than 95 percent) of BLM-administered lands in the planning area.

1-21: The priority criteria for acquisitions of new lands are: 1) riparian (e.g., wetlands, perennial streams, etc.); 2) habitat for special status animal species and areas with special status plant species; 3) recreation use sites adjacent to water areas; 4) wildlife habitat; 5) access; and 6) lands to improve overall manageability. Some potential zones of acquisitions have been tentatively identified on the Realty Action Decisions Map at the back of this document.

1-22: Land disposal of the scattered parcels in the San Luis Lakes and Mishak Lakes area will be limited to agencies or entities (Colorado Division of Parks and Outdoor Recreation, Colorado Division of Wildlife, Trout Unlimited, U.S. Fish & Wildlife Service, Nature Conservancy, National Park Service, etc.) with an interest in the maintenance or enhancement of the potential riparian/wetland values.

Land Use Allocation Decisions

1-10: Land disposals will occur under the Category I criteria. Disposal of approximately 5,300 acres shown on the realty map in the back of the document will occur through sales or other methods.

1-11: Land disposals can occur through other methods under Category II criteria. Approximately 352,000 acres, shown on the realty map in the back of this document, will be available for potential disposal if it is determined to be in the public interest. Category II lands, if reviewed on a case-by-case basis and determined to meet Section 203 criteria and would serve the public interest, could also be available for sale.

1-12: Land disposal will not occur in the designated ACECs, WSAs, and SRMAs within the planning area; disposal of lands with riparian values will only be allowed through exchange, unless excepted in other decisions.

1-13: Existing withdrawals will be retained.

1-14: New withdrawals will be recommended to protect the five NRHP sites (approximately 560 acres).

1-15: Utility corridor routes, identified by the Western Utility Group (WUG) and included in the Rio Grande Forest Plan, are adopted with three exceptions.

1. No utility corridor from the Poncha Pass corridor west to Middle Creek (near Saguache) to Del Norte. This area has many acres of crucial winter wildlife habitat, is highly scenic, and is an important dispersed recreation area. Any expansion of utility use in the Poncha Pass corridor will be analyzed thoroughly under the NEPA process.

2. No utility corridor from New Mexico State line up along the Rio Grande River to Alamosa. Future powerlines proposed into Colorado from New Mexico will be routed outside the Rio Grande River Corridor.

3. No major utility corridors will be allowed in existing ACECs.

1-16: Any impacts from ROWs adjacent to or that cross riparian areas will be mitigated.

1-17: All other BLM lands will be open to rights-of-way for other utility lines, roads, etc., and each will be evaluated on a case-by-case basis for alignment and mitigation stipulations.

Management Action Decision

1-8: Identify and designate access corridors through BLM-administered lands at the time the support services management plan (SSMP) is completed.

Recreation Management

Resource Condition Objective Decisions

1-23: Allow continued dispersed recreational opportunities on BLM-administered lands.

1-24: Provide special management in areas with significant recreation potential and increased use; e.g., Penitente Canyon, Zapata Falls, etc.

Land Use Allocation Decisions

1-18: Two areas of special concern are designated within area #1; the Penitente Canyon Special Recreation Management Area (7,529 acres) and the Zapata Falls Special Recreation Management Area (6,302 acres). These 13,831 acres will be managed for intensive recreation.

1-19: A total of 375,466 acres of BLM-administered lands will be managed for extensive recreation in area #1.

1-20: The majority of BLM-administered land in area #1 will be designated as open or limited (seasonal, designated roads and trails, etc.) to vehicular travel. The public will be encouraged through an awareness program to stay on roads to protect environmental values. The only areas closed to vehicular travel will be the recommended wilderness areas. Designated corridors that lead to U.S. Forest Service, state, and private lands will be identified in the SSMP for use during the limited period.

1-21: Crucial big game winter and birthing areas will be designated as limited (seasonal) for OHV use.

Management Action Decisions

1-9: Develop public awareness and public interpretive programs to focus on user ethics, sensitive resource values, information brochures, signing, etc., for cultural, and wildlife, recreational opportunities. Provide dispersed watchable wildlife opportunity sites and sites to interpret special status plant values. These efforts will primarily be a recreation program, but cooperation from the other resources will be needed.

1-10: Develop facilities in Penitente Canyon to accommodate increasing recreation use, including restrooms, parking, and primitive camping.

1-11: Develop an activity plan focusing on management needs to accommodate growing recreation use, especially rock climbing, but also protect resource values.

1-12: Pursue acquisition of state and private lands within the Zapata Falls SRMA.

1-13: Develop an activity plan for Zapata Falls SRMA focusing on improved access to the falls and needed facilities including day use, interpretive signing, etc.

Visual Resource Management

Resource Condition Objective Decisions

1-25: Manage visual resource values on public lands to conform to current VRM inventory class objectives with one exception listed in Land Use Allocation Decision #1-22.

1-26: Manage the Blanca Peak chaining, striving towards a class III objective.

Land Use Allocation Decision

1-22: Public lands to the west of U. S. Highway 285 will be managed according to VRM Class III objectives to allow for a major utility corridor.

Historical Resources

Resource Condition Objective Decision

1-27: Manage 18 historical sites on BLM lands for protection from adverse impacts of other resources.

Land Use Allocation Decision

1-23: Five eligible national register sites (560 acres) will be protected; e. g., remain in public ownership, closed to OHV, withdrawn from mineral entry, leased with NSO stipulation, limit access for administrative use, etc.

Management Action Decisions

1-14: Prepare CRMPs for these five significant sites as a part of the National Register of Historic Places nominating process. They will be available for the following use categories: "scientific use," "public use," and "management use."

1-15: Prepare a valley-wide CRMP for the 13 sites (620 acres) not eligible for the National Register of Historic Places (NRHP) and manage these sites according to this activity plan.

Archaeological Resources

Resource Condition Objective Decision

1-28: Manage all significant archaeological sites for protection from adverse impacts of other resources.

Management Action Decisions

1-16: Complete specific CRMPs on those sites (i.e., Punche Valley, Dry Creek, etc.) eligible for inclusion on the National Register, either as a national site, a national district, or a noncontiguous district.

1-17: Complete a valley-wide CRMP on those sites not eligible for inclusion on the NRHP and areas remaining to be inventoried.

1-18: Provide selected parts of various sites for public education and scientific purposes as specified in the valley-wide CRMP, a site-specific CRMP, or a CRMAP.

Special Status Plant and Animal Values

Resource Condition Objective Decision

1-29: Provide management to enhance, recover, or re-establish special status plant and animal values.

Waterpower/Storage

Resource Condition Objective Decision

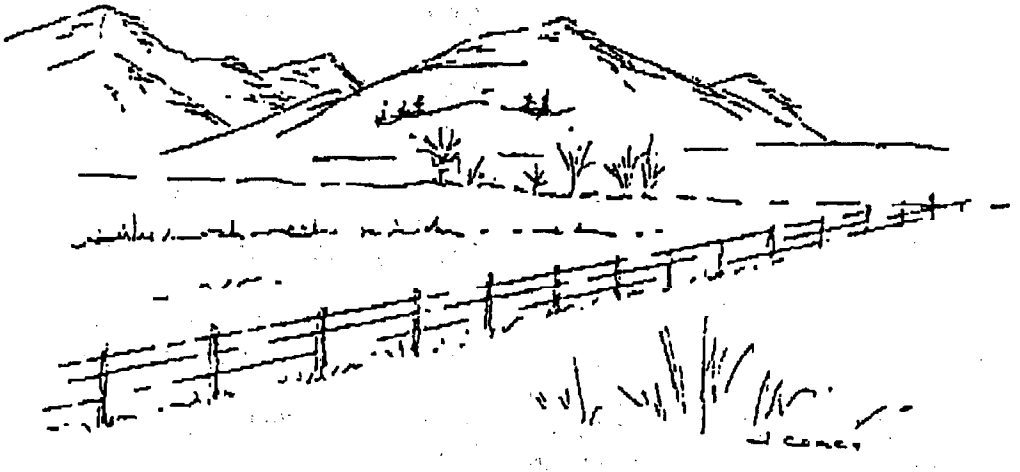
1-30: Continue maintenance of the physical potential for the development of waterpower/storage.

Management Action Decisions

1-19: Evaluate and weigh potential waterpower/storage values of all sites prior to rejecting possible land acquisitions.

1-20: Evaluate sites not withdrawn, and if warranted, pursue opportunities for acquiring the land and recommend any affected land for withdrawal.

1-21: Develop measures to be included in FERC licenses to mitigate other resources in areas where other resources are in conflict with undeveloped sites.



Trickle Mountain Area #2

All decisions under area #1 will apply here unless otherwise stated. Area #2 contains 44,521 acres of BLM-administered lands.

Resource Condition Objective Decision

2-1: Provide special management to protect and enhance special wildlife values (multiple overlapping and intensive big game winter use), other significant natural values, and special status plant values.

Land Use Allocation Decisions

2-1: This area, including the Ford Creek Riparian Area and existing WHA, will be designated as an ACEC.

2-2: Five bighorn sheep lambing ranges and special status values (6,260 acres) will be protected by NSO and disposal stipulations. Other crucial wildlife habitat will be protected through no disposal stipulations and seasonal limitations.

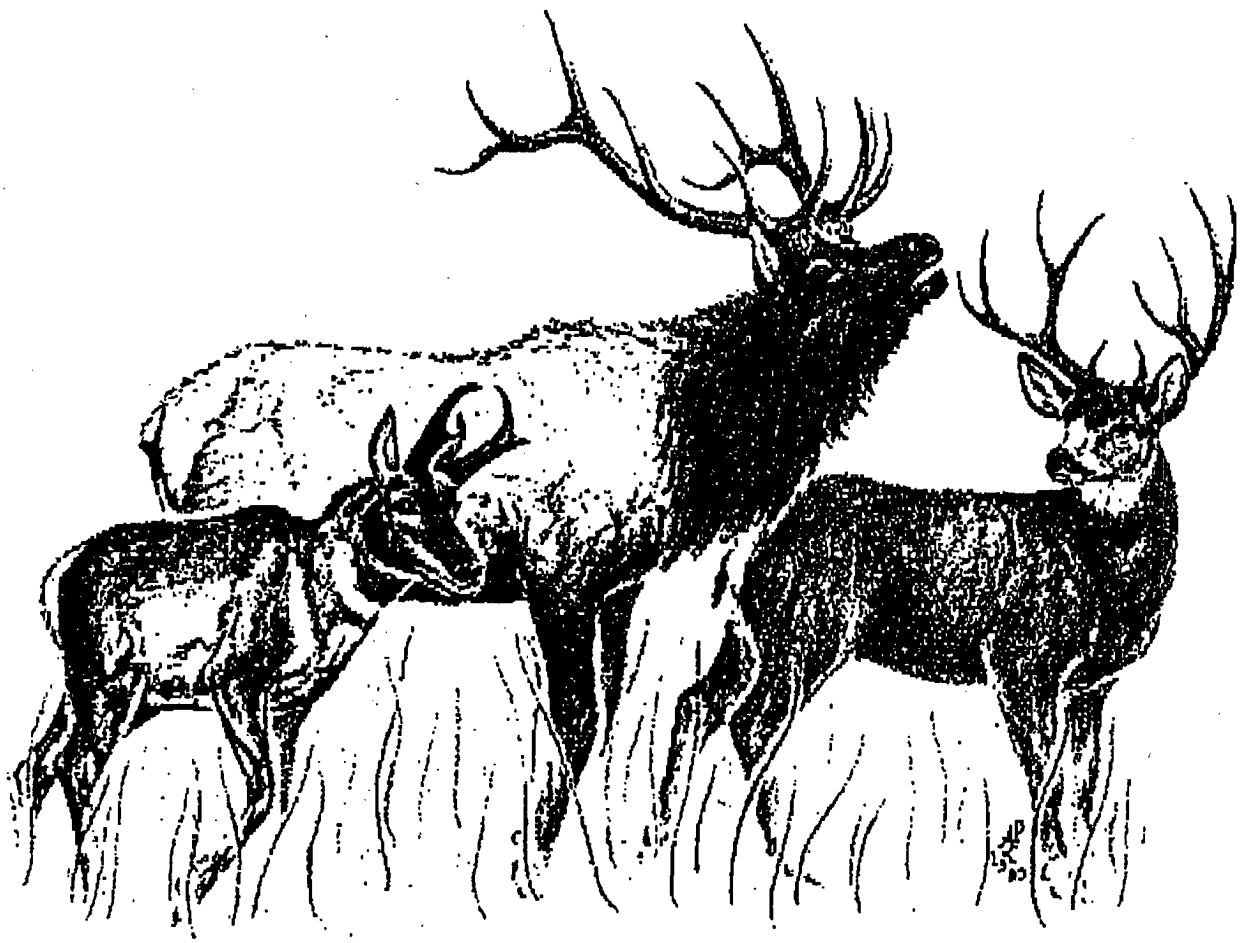
2-3: Application of seasonal limitations on timber cutting in bighorn sheep lambing range (6,260 acres).

2-4: Application of limited OHV use, and all travel at other times will be limited to designated roads and trails within this ACEC and per the CRMAP. The existing OHV plan will remain in place until a CRMAP is completed.

Management Action Decisions

2-1: Continue the riparian demonstration project on Ford Creek.

2-2: Develop CRMAP emphasizing crucial winter and birthing habitats as priority objectives and addressing special status animals and plants.

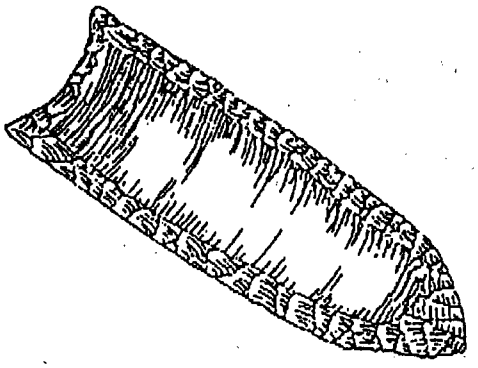


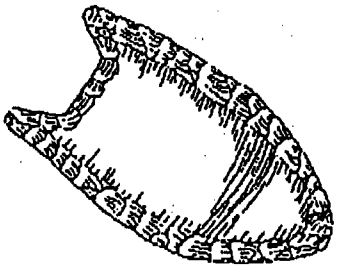
Sand Castle Area #3

All decisions in area #1 will apply here unless otherwise stated. Area #3 contains 3,595 acres of BLM-administered lands.

Resource Condition Objective Decision

3-1: Provide special management to protect the cultural and ecological resources within the Sand Castle area, with emphasis on the 200-acre "Folsom" archaeological site.





Land Use Allocation Decisions

3-1: ACEC designation will provide protection for the significant cultural and ecological values.

3-2: The area is designated as a limited OHV area. Travel within the Sand Castle area will be restricted to designated roads and trails identified in the CRMAP, which will also determine specific measures that may be taken to manage those potential impacts caused from OHV riding on roads and trails. Until the CRMAP is complete, travel will be limited to existing roads and trails.

3-3: Locatable mineral entry will be precluded, and a new protective withdrawal will be placed on the 200-acre Folsom site in this ACEC.

3-4: A no surface occupancy (NSO) stipulation for fluid minerals management will be placed on the 200-acre Folsom site in this ACEC.

Management Action Decision

3-1: Complete a CRMAP for the area with emphasis on the protection of significant cultural and ecological values.

Blanca Area #4

All decisions in area #1 will apply here unless otherwise stated. Area #4 contains 9,147 acres of BLM-administered land.

Resource Condition Objective Decision

4-1: Provide special management to maintain and improve wetlands for waterfowl production in the area, maintain 1,600 acres of wetlands, and enhance an additional 1,175 acres of historical wetlands. Recreation emphasis will be placed on warm water fisheries and watchable wildlife-related values.

Land Use Allocation Decisions

4-1: The area is designated as an area of critical environmental concern (ACEC) and a special recreation management area (SRMA). This area will be managed with a strong emphasis on wildlife management and public recreation opportunities. Recreation objectives for the Blanca SRMA will be to enhance opportunities for fishing, viewing wildlife, waterfowl hunting, upland game hunting, and other day-use recreation. Since recreation opportunities are dependent on wildlife values, these values will be enhanced and protected.

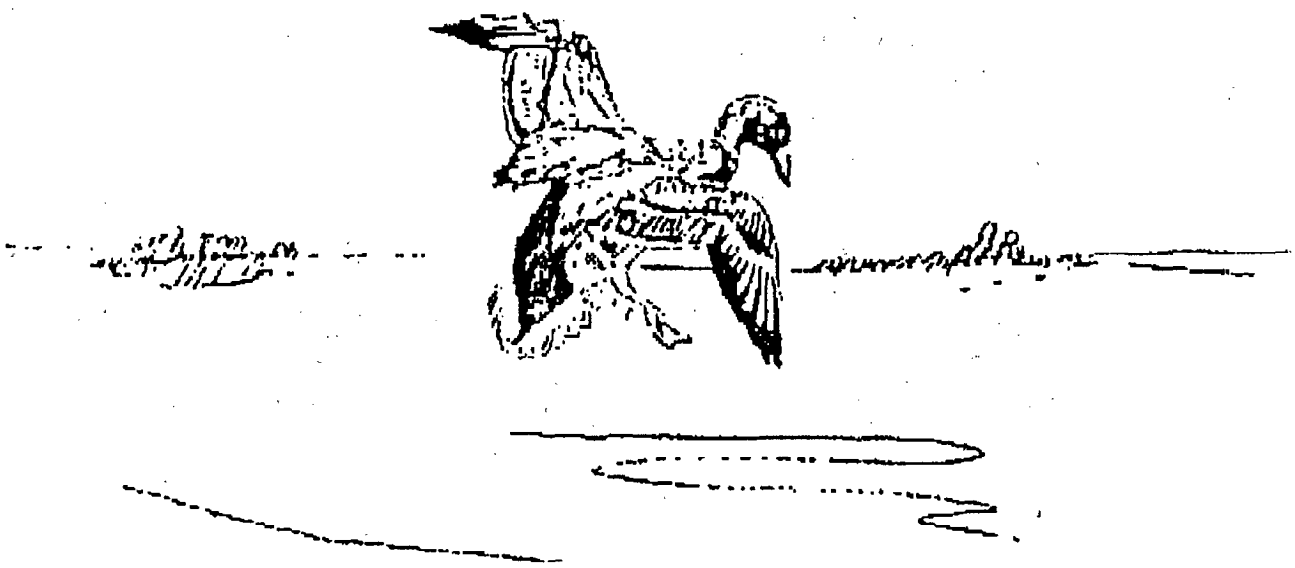
4-2: Locatable mineral entry will be precluded in this area.

4-3: Limited OHV designations (seasonal limitations and travel restricted to designated roads and trails as per the CRMAP) will maintain and protect significant values. Until the CRMAP is complete, travel will be limited to existing roads and trails.

4-4: Protect waterfowl nesting and water bird nesting habitat in the ACEC with seasonal limitations from February 15 to July 15.

Management Action Decision

4-1: Complete a CRMAP with specific emphasis on blending the existing Blanca HMP into the additional recreational objectives now existing for this area and opening a portion of the area for wildlife viewing opportunities during the limited closure. Recreation objectives will conform to the existing site-specific guidance within the Blanca HMP.



Elephant Rocks Area #5

All decisions in area #1 will apply here unless otherwise stated. Area #5 contains 1,852 acres of BLM-administered land.

Resource Condition Objective Decision

5-1: Provide special management to protect unique geological, scenic, visual, special status plant values, recreation, and other significant natural resource values.

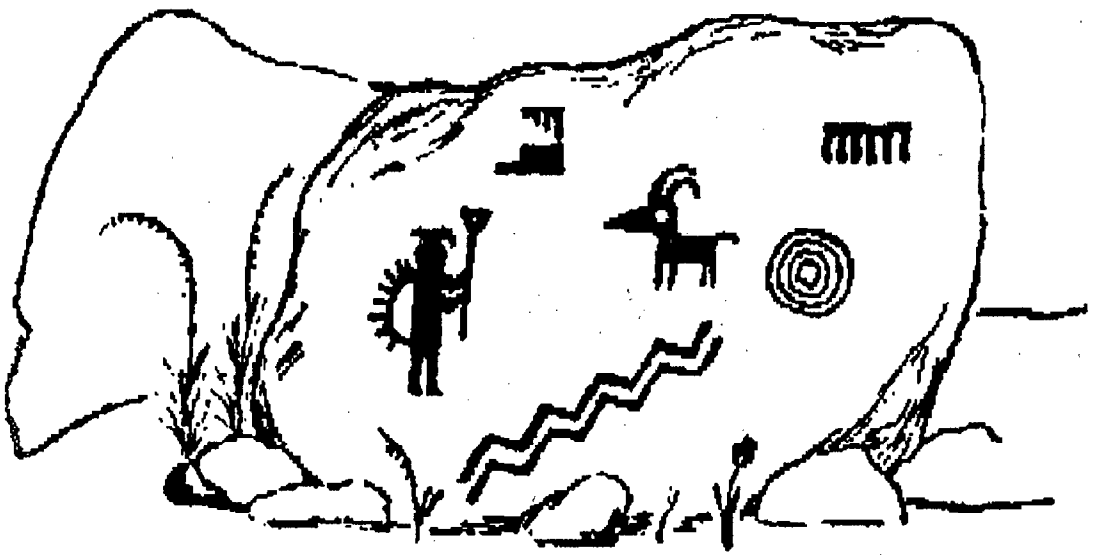
Land Use Allocation Decisions

5-1: ACEC designation will provide protection for the unique geological, scenic, visual, special status plant values, recreation, and other significant natural resource values.

5-2: Limited OHV designations (seasonal limitations and travel restricted to designated roads and trails as per the CRMAP) will maintain and protect significant values. Until the CRMAP is complete, travel will be limited to existing roads and trails.

Management Action Decision

5-1: Complete a CRMAP for the Elephant Rocks ACEC and address those special status plant values to be protected. Portions of the Penitente SRMA overlap this ACEC and these recreation objectives will be considered in the Elephant Rocks CRMAP.



Ra Jadero Canyon #6

All decisions in area #1 will apply here unless otherwise stated. Area #6 contains 3,632 acres of BLM-administered lands.

Resource Condition Objective Decision

6-1: Provide special management to protect the unique special status plant values and other significant natural resources.

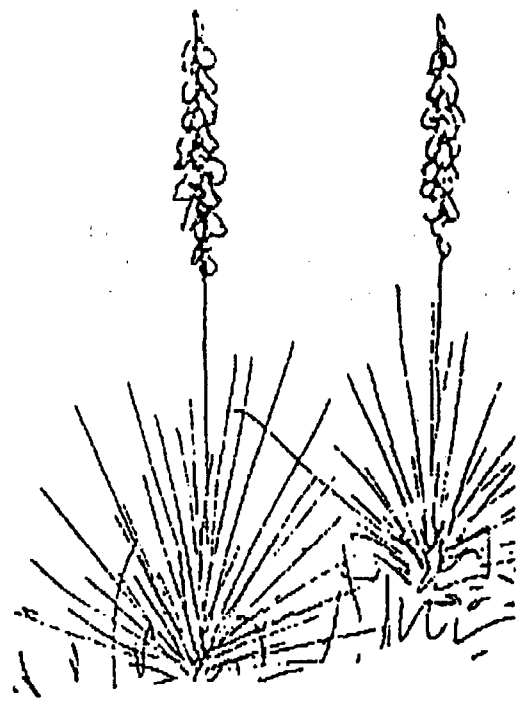
Land Use Allocation Decisions

6-1: ACEC designation will provide protection for the unique special status plant values and other significant natural resource values.

6-2: Limited OHV designations (seasonal limitations and travel restricted to designated roads and trails as per the CRMAP) will maintain and protect significant values. Until the CRMAP is complete, travel will be limited to existing roads and trails.

Management Action Decision

6-1: Complete a CRMAP for the ACEC and address those special status plant values to be protected.



Los Mogotes Area #7

All decisions in area #1 will apply here unless otherwise stated. Area #7 contains 33,456 acres of BLM-administered land.

Resource Condition Objective Decision

7-1: Provide special management to protect and enhance big game crucial winter habitat, birthing habitats, and special status plant values.

Land Use Allocation Decisions

7-1: ACEC designation will provide protection for wildlife habitat, and this protection will be described in the CRMAP. Seasonal limitations for development of the mineral materials during the winter months will also be included in the CRMAP.

7-2: Limited OHV designations (seasonal and travel restricted to designated roads and trails as per the CRMAP) will maintain and protect significant values. Until the CRMAP is complete, travel will be limited to existing roads and trails.

Management Action Decision

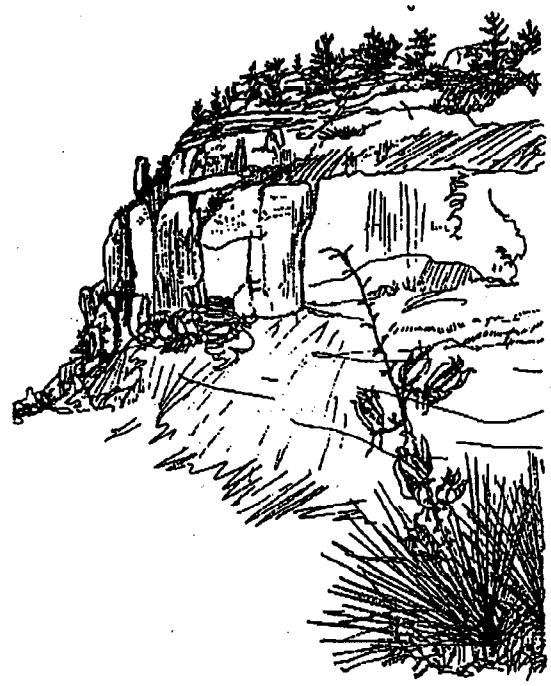
7-1: Complete a CRMAP with emphasis on protecting special status plant and animal values and big game crucial winter and birthing habitats as priority objectives.

San Luis Hills #8

All decisions in area #1 will apply here unless otherwise stated. Area #8 contains 28,713 acres of BLM-administered land.

Resource Condition Objective Decision

8-1: Provide special management to maintain and, if possible, improve condition on the existing acres of Flat Top Mountain wetlands, big game habitat, and special status plant values.



Land Use Allocation Decisions

8-1: ACEC designation of the San Luis Hills area, including Flat Top Mountain, will provide protection for the significant natural values.

8-2: A no surface occupancy (NSO) stipulation for fluid minerals management will be placed on the 2,000-acre SPNM portion of Flat Top Mountain in the ACEC.

8-3: The Flat Top Mountain segment (2,000 acres) of the ACEC will be closed to disposal of mineral materials.

8-4: Manage 2,000 acres of the Flat Top Mountain portion of the San Luis Hills ACEC as an OHV closed area.

8-5: The remainder of the ACEC will be designated as a limited OHV area with travel restricted to designated roads and trails. Until the CRMAP is complete, travel will be limited to existing roads and trails.

Management Action Decisions

8-1: Complete a CRMAP for the area to protect the existing significant values. This may be combined with the one for Rio Grande River Corridor #9.

8-2: Develop a research program for special status plant values.

8-3: Consider a joint study and analysis effort between New Mexico and Colorado BLM to determine a recommendation for the potential designation of all of the Rio Grande Corridor (57 miles in New Mexico and 41 miles in Colorado) as a national conservation area (NCA). The area in Colorado will include all of the San Luis Hills ACEC and the Rio Grande River Corridor ACEC and other unique areas appropriate for designation.

Rio Grande River Corridor #9

All decisions in area #1 will apply here unless otherwise stated. Area #9 contains 2,640 acres of BLM-administered land. The 41-mile corridor contains 13,230 acres, which include BLM, USFWS, and private land.

Resource Condition Objective Decisions

9-1: Provide special management for the significant natural/scenic/recreational values on 2,640 acres along a 22-mile stretch of the river administered by BLM as an area of critical environmental concern (ACEC). This portion of the corridor will be managed for strict conformance to visual resource management (VRM) class objectives, and for protection of the extensive wildlife resources and the potential recreational opportunities within this corridor.

9-2: Manage areas within the foreground area of the corridor that are presently VRM Class III as VRM Class II.

Land Use Allocation Decisions

9-1: ACEC designation of the 2,640 acres within the Rio Grande River Corridor will provide protection for the significant wildlife and recreation values.

9-2: SRMA designation of 4,595 acres along a 29-mile stretch of the river administered by BLM will provide for the intensive management of recreation. The various scattered parcels of BLM-administered lands along the river between the Lasauses Cemetery and the County Bridge will be managed for their recreation access potential and will be developed as a portion of this SRMA. Development of recreation sites will occur within these 29 miles. Management emphasis in the Rio Grande River SRMA will be to enhance floatboating, fishing, and other recreational opportunities. BLM will acquire additional acreage and access in these areas. Acquisition of lands or interest in lands within the SRMA will be accomplished either by fee title methods (i.e., land exchanges with or acquisitions from willing sellers) or acquisition of scenic easements, which would allow landowners to retain title to the land.

9-3: A no surface occupancy (NSO) stipulation for oil and gas leasing will protect the wild and scenic values, birds of prey values, visual values, etc. , on the 2,640 acres of lands administered by BLM within the Rio Grande River Corridor ACEC.

9-4: The Rio Grande River Corridor ACEC (2,640 acres) will not be available for mineral materials disposal.

9-5: Locatable mineral entry will be precluded in this ACEC.

9-6: The lower 41 miles (1,850 acres USF&WS, 2,830 acres BLM, 8,550 acres private), of the Rio Grande River Corridor have been determined to meet the wild and scenic eligibility criteria; 22 miles (2,640 acres BLM and 4,400 acres private) of this corridor have been determined to meet the wild and scenic suitability criteria. Segment A has significant manageability problems and cannot be considered as suitable. The river has been potentially classified "scenic" for the upper 33 miles and "wild" for the lower 8 miles. The river corridor contains significant values deserving of some enduring form of protection. This protection could be through wild and scenic river designation, national conservation area designation, or some other appropriate means. The Federal legislative process will determine the most appropriate form of enduring protection. In the interim the river corridor will be managed to protect the outstanding remarkable values. See Attachment 7 in Appendix A.

9-7: The potential waterpower site withdrawals that presently exist within the Rio Grande Wild and Scenic River Corridor ACEC will be terminated if a wild and scenic river designation, or a national conservation area designation, etc., is approved by Congress.

9-8: The BLM-administered lands within the Rio Grande River Corridor ACEC are designated as limited; OHV use will be restricted to designated roads and trails. Until the CRMAP is complete, travel will be limited to existing roads and trails.

Management Action Decisions

9-1: A coordinated resource management activity plan (CRMAP) will be completed for the ACEC/SRMA portion of this river corridor. This site-specific CRMAP will address the protection of various special values within the corridor; e.g., special status plant and animal values, potential outdoor recreation opportunities and facility development needs, riparian values, visual resources, wildlife values, etc., as well as the interim management for wild and scenic river values. This CRMAP may be combined with the one for San Luis Hills #8.

9-2: Consider a joint study analysis effort between New Mexico and Colorado BLM to determine a recommendation for the potential of all the Rio Grande Corridor (57 miles in New Mexico and 41 miles in Colorado) as a national conservation area (NCA). The Colorado portion of the corridor will potentially include all of the San Luis Hills ACEC, the Rio Grande River Corridor ACEC, and adjoining lands.

Cumbres and Toltec Scenic Railroad Corridor #10

All decisions in area #1 will apply here unless otherwise stated. Area #10 contains 3,824 acres of BLM-administered lands.

Resource Condition Objective Decisions

10-1: Provide special management to the corridor for strict conformance to existing VRM class objectives.

10-2: Protection of historical and visual values will be emphasized in the CRMAP.

Land Use Allocation Decisions

10-1: Designation of the minimum necessary foreground viewshed as an ACEC will provide protection for the unique scenic resources viewed from the train.

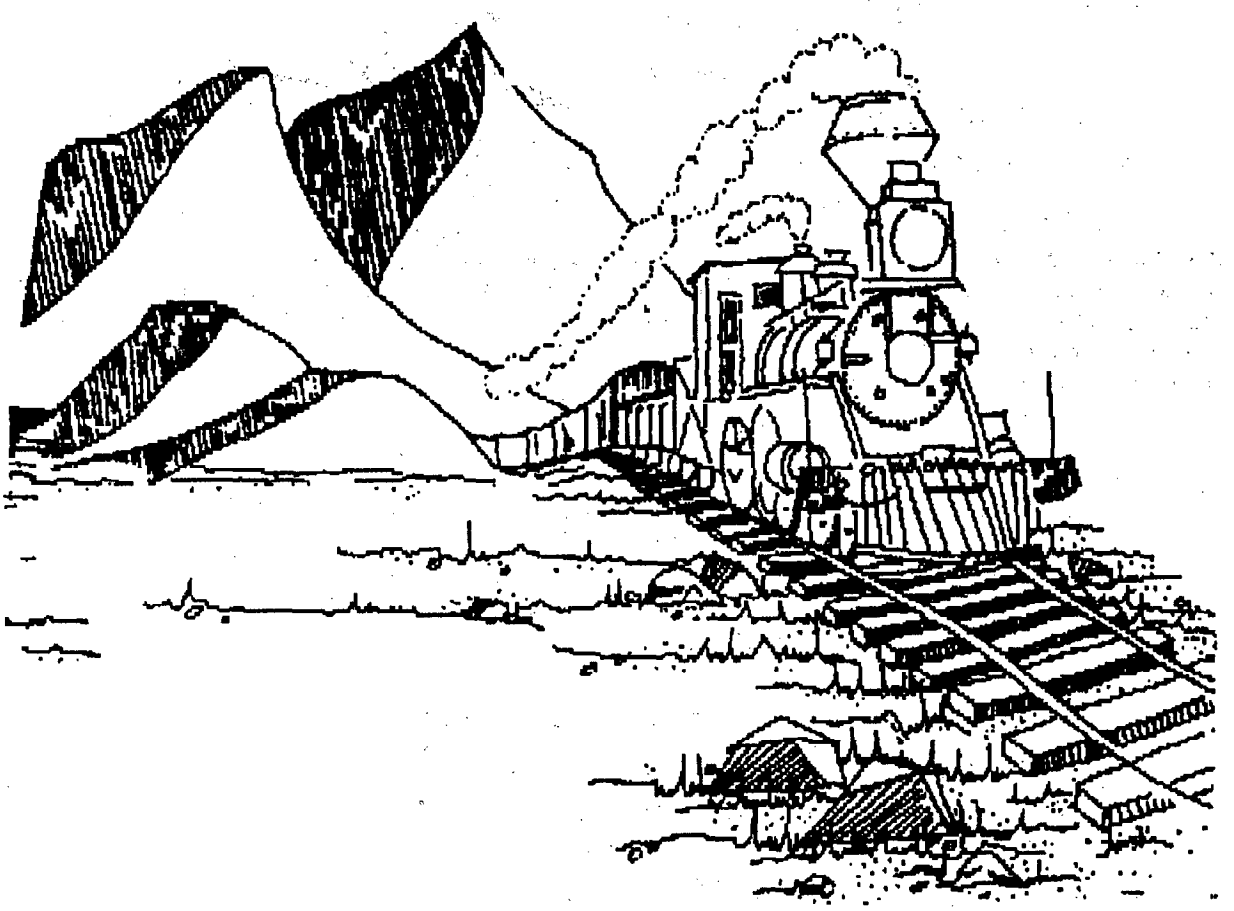
10-2: The ACEC will not be available for mineral materials disposal.

10-3: The ACEC will be leased for fluid minerals management with a no surface occupancy (NSO) stipulation.

10-4: Limited OHV designation (seasonal and travel limited to designated roads) will continue. Until the CRMAP is complete, travel will be limited to existing roads and trails.

Management Action Decision

10-1: Prepare CRMAP for area with emphasis on protection of unique scenic resource viewshed.



ACTIVITY PLANS BY RESOURCE/RESOURCE USE

The following activity plans will be needed to implement decisions in this proposed RMP:

Paleontology: An area-wide surface-disturbance and development plan and a site-specific plan for the one public paleo use/educational site near Clayton Cone.

Riparian Resources: Site-specific planning as necessary for all riparian zones to modify existing habitat management plans (HMPs) or allotment management plans (AMPs) and to make site-specific input into various coordinated resource management activity plans (CRMAPs) for implementation of the RMP.

Livestock Grazing: In all pertinent allotments, modify and/or develop management AMPs. Make site-specific input into various coordinated resource management activity plans (CRMAPs) to meet the specific decisions within the RMP.

Wildlife Habitat Management: Site-specific planning on all intensively managed wildlife areas in Trickle, Blanca, Los Mogotes, and the Rio Grande River Corridor will be done within a CRMAP. Special status species planning and input will be made into various CRMAPs and activity plans.

Forest and Woodlands: Site-specific planning will be done as part of a CRMAP for Trickle Mountain.

Lands and Realty Management: Site-specific planning for lands actions, etc., will be part of an area-wide combined support services management plan (SSMP)

Areas of Critical Environmental Concern: Site-specific planning to ensure that RMP decisions are implemented. Each ACEC will require a completed CRMAP.

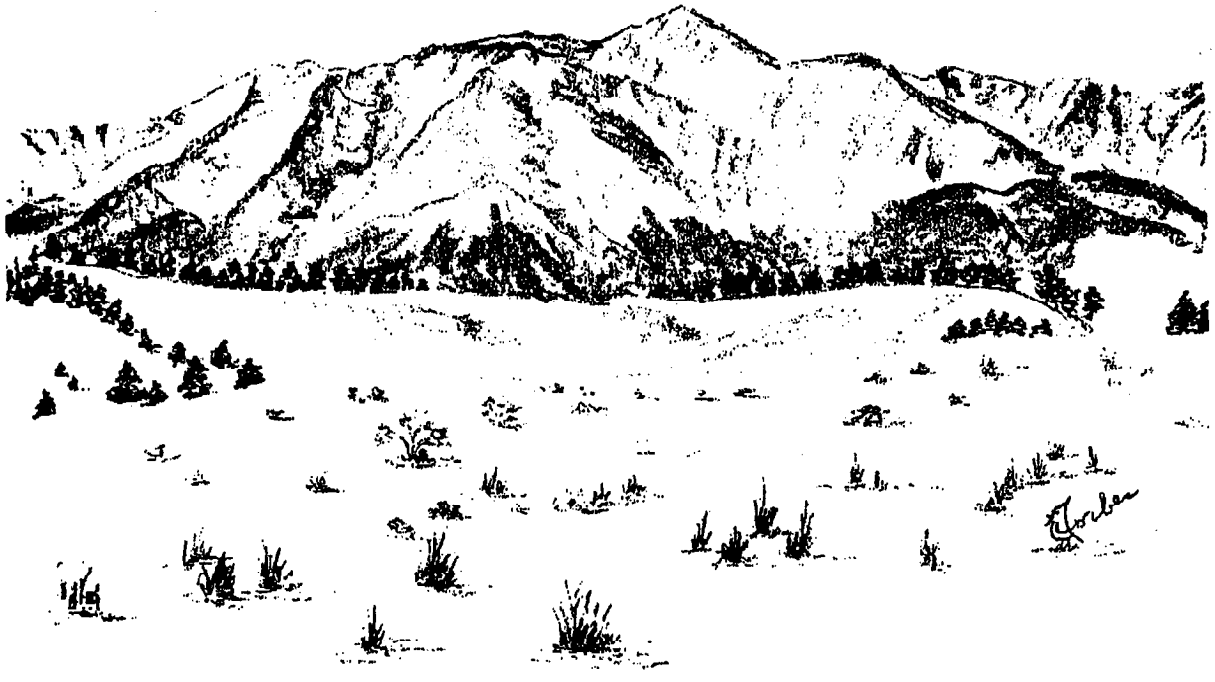
Historical and Archaeological Resources: Cultural resource management plans (CRMPs) will be done (e.g., Punche Valley, La Garita Creek, Dry Creek, etc.), specific input into a CRMAP will be accomplished in special management areas (i.e., ACECs), and one area-wide CRMP will be done on all areas not covered specifically.

Fire: The existing activity plan will be reviewed and updated to comply with the RMP, which will occur at the first regularly scheduled annual review and update. Input into all CRMAPs will be done as needed.

Recreation: Either a recreation area management plan (RAMP); i.e., Zapata Falls and Penitente Canyon, or specific input into a CRMAP for intensively managed areas (i.e., Blanca and Rio Grande River Corridor).

Support Services: An area-wide combined support services management plan (SSMP) with other supporting services (i.e., access, transportation, cadastral, off-highway vehicle use, engineering, hazards, land ownership adjustment, recreation opportunity signing, off-highway recreation control signing, monitoring, etc.) to fulfill resource management plan (RMP) decisions.

CHAPTER 4
CONSEQUENCES OF THE PROPOSED PLAN



CHAPTER 4

CONSEQUENCES OF THE PROPOSED PLAN

This chapter describes the physical, biological, and economic consequences of implementing the San Luis Proposed Resource Management Plan as presented in Chapter 3 of this document. Only resources and resource uses that will have consequences as a result of implementing the decisions within this proposed plan are discussed.

Both adverse and beneficial consequences, based on the effects of the proposed resource condition objectives, land use allocations, and the management actions are discussed. Mitigating measures designed to avoid or reduce environmental consequences are incorporated into the proposed plan and this corresponding environmental analysis. Those identified consequences are considered unavoidable with the prescribed mitigation.

ASSUMPTIONS FOR ANALYSIS

An interdisciplinary approach was used in developing and analyzing environmental consequences. The general and resource/resource use-specific assumptions, which defined the parameters of the analysis within the draft RMP/EIS, are covered in the first section of this chapter.

General Assumptions

Implemented actions from decisions made in this proposed resource management plan (RMP) will be in compliance with all valid existing rights, Federal regulations, Bureau policies, etc.

Implementation of the approved resource management plan (RMP) will begin 30 days after the approved RMP and record of decision (ROD) are signed by the BLM state director, and all implemented actions will subsequently conform to the specific approved RMP decisions.

The life of the plan will be approximately 15 to 20 years. Changes or effects described during the life of the plan will be short term unless otherwise stated and will occur during or immediately following implementation of an action. Short-term impacts will occur over a 5-year period following implementation; long-term impacts will occur over a 5- to 20-year period.

Analysis in the proposed plan is based on the assumption that adequate finances and personnel will be available to implement the decisions of the plan.

Effects, for the purpose of this analysis, are the net unavoidable changes, impacts, etc., to a resource or resource use after mitigation.

Only significant changes or effects, which vary by resource/resource use, are analyzed. Also, those actions with significant changes or effects that will subsequently be fully mitigated by existing Bureau and Bureau-adopted stipulations will not need to be analyzed. Fully mitigated effects will have no net adverse unavoidable change or effect.

The stated net unavoidable effects will be monitored and continually evaluated during the life of the plan. Where necessary, adjustments in the actions will 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 accompanying documents will be analyzed as needed through plan amendments/environmental assessments or environmental impact statements. This additional analysis will be done in accordance with Bureau planning/environmental guidance prior to BLM consideration for approval of that action.

Resources and resource uses with insignificant net unavoidable effects are analyzed in the management common section of chapter 3 and are not further addressed in this chapter. Those resources or resource uses include: climate, air quality, soils, water resources, geology and topography, vegetation, fire management, and hazards management. All other resources and resource uses are analyzed in this chapter of the proposed plan.

Minerals Management Assumptions

The reasonably foreseeable level of fluid mineral operations per year within the planning area will involve 3 to 10 applications for permit to drill (APDs) and 3 to 7 notices of intent (NOIs) to conduct geophysical operations. This level of fluid mineral activity represents an estimated maximum disturbance of about 40 acres per year.

Geophysical exploration operations will be subject to relatively the same management decisions and subsequent effects as identified for fluid mineral leasing and development.

Although existing fluid mineral leases will not be modified by the decisions of this plan during the term of each lease, lessees and operators will be encouraged to voluntarily comply with such requirements if and when operations are conducted.

Retention or disposal of mineral rights on BLM-administered lands identified for land ownership adjustment will be determined on a case-by-case basis. Disposal of these lands with low-value minerals could potentially create a split-estate situation; i.e., surface estate separated from the subsurface minerals. Exploration and development in these areas could cause some additional operational requirements; however, because of the assumed low-mineral values, the effect will be insignificant.

Paleontological Resources Assumptions

Under current circumstances, paleontological resources will continue to deteriorate through natural forces, public visitation, and vandalism if no corrective nor preventive action is taken. Full compliance and implementation of the laws, regulations, and Bureau policy will be completed before beginning any actions resulting from approved RMP decisions; however, there will still be a net adverse effect to this resource.

Riparian Resource Management Assumptions

Riparian resource management will continue to improve within the planning area. Full compliance with and implementation of the new Bureau guidance to maintain and/or improve current conditions in riparian zones will significantly and positively affect this resource. Prior to implementation, all actions within riparian zones will be assessed for their effects on the resource.

Livestock Grazing Management Assumptions

Current trends in livestock market conditions in the planning area will continue for the life of the plan. Livestock values will, therefore, fluctuate the same as at present.

Assessments of vegetative effects will be based on expectations of normal precipitation during the life of the plan.

Long-term grazing use levels will be based on the effectiveness of the allotment management plan (AMP) process, through evaluation of monitoring information (e.g., utilization studies and actual use data) and modifications of those use levels as the need occurs.

Grazing decisions in this PRMP replace grazing EIS decisions and range program documents (summary updates). These RMP decisions will be implemented after the approved RMP/ROD is signed.

Wildlife and Fish Habitat Management Assumptions

Any quality changes in big game and waterfowl habitat could cause an increase or decrease in those wildlife populations. A direct relationship exists between the quality (e.g., condition and trend) of wildlife habitat and the wildlife populations using that habitat (e.g., numbers of animals and waterfowl).

Forest and Woodland Management Assumptions

Timber stand quality will continue to decline on old harvest areas, and pests and disease problems will increase if the infected residual stands remain. Appropriate timber stand harvest and improvement (e.g., proper silviculture practices) will enhance most other resources. Typically rangeland resources (e.g., wildlife and livestock forage) will not be affected.

Lands and Realty Management Assumptions

Land ownership adjustments (e.g., increases and/or decreases in BLM lands) will be made. Preference will be given to those adjustments that will provide the most benefits to the public. This would be either public gains in quality of lands (e.g., gaining riparian zones) or in quantity of lands (e.g., land exchanges where more acres are gained than given).

Various methods of land ownership adjustment will be considered and will be accomplished according to FLPMA. In all cases, fair market value will be received for lands sold or leased for private use, and lands of equal or greater value will be received for exchanges.

All land adjustments identified will be completed during the life of the plan. Also the adjustments will block up BLM lands through acquisition of state and private lands and disposal of isolated BLM tracts.

Reducing trespass on BLM land will be a high priority in the resource area.

Concentrated areas with existing major utility lines are established as designated utility corridors in consultation/coordination with the Western Regional Corridor Study (WRCS). Future major rights-of-way (ROWs) will be restricted to these corridors unless appropriate justification is provided to do otherwise. Location of future major ROWs in specified areas will be confined to the area between existing ROWs in the Poncha Pass to Saguache area in the WRCS Corridor A.

Actions with site-specific impacts from development of facilities within communication sites, on smaller ROWs requested by the public, and in corridors (if designated) will be assessed in accordance with Bureau planning/ environmental regulations prior to BLM consideration for approval.

Wilderness Management Assumptions

All the resource area WSAs will be managed under BLM Interim Management Policy and Guidelines for Lands Under Wilderness Review (IMP) until Congress makes a decision on wilderness designations within the district. Any WSAs released by Congress from wilderness consideration will be returned to other multiple use management for BLM-administered lands as prescribed in this plan.

An interagency agreement between the U.S. Forest Service and BLM dated February 20, 1981, provided for the joint study of adjoining wilderness areas and designated the forest service as the lead agency in the study. A proposal has been made to Congress recommending 3,300 acres of contiguous BLM study areas (Black Canyon, South Piney Creek, Papa Keal, and Zapata Creek) suitable for wilderness designation.

Designated wilderness areas bordering national forest and national park lands will be managed in cooperation with those adjacent responsible agencies through actions such as cooperative agreement.

Areas of Critical Environmental Concern Assumptions

All areas considered for wilderness (e.g., initial study areas) and those now designated for wilderness study (e.g., wilderness study areas) have some special values and, therefore, were considered in the nomination process as potential areas of critical environmental concern (ACECs). In addition to the 7 areas considered for wilderness values, 15 other sites were nominated, evaluated, and screened for recommendation as ACECs in this plan. Ten of the 22 areas were determined to meet the Bureau ACEC screening criteria and were analyzed in the draft RMP/draft EIS. Future areas may be nominated, screened, and recommended. An EA/plan amendment will be prepared for future designated areas.

Access and Transportation Management Assumptions

Acquisition of all identified access proposals will improve administration of resource programs. Also BLM collector and local roads will continue to be maintained, and BLM resource roads will not be routinely maintained. An active signing/barricading program will also be implemented on road closures and problem areas.

Recreation Management Assumptions

Based on documentation in the Colorado Comprehensive Outdoor Recreation Plan (CORP), visitor use on BLM lands is expected to significantly increase over present rates. New technology will result in growth of activities, which cannot be anticipated (e.g., rock climbing.)

Visual Resource Management Assumptions

All actions will be guided by BLM visual resource management class objectives.

Historical Resources Assumptions

Under current circumstances, historical resources will continue to deteriorate through natural forces and from public use and vandalism if no corrective nor preventive action is taken. Clearance will be required pursuant to 36 CFR 800. Full compliance and enforcement of Section 106 of the *National Historic Preservation Act* (1966) will be completed before beginning any actions resulting from approved RMP decisions; however, there will still be a net adverse effect to this resource.

Archaeological Resources Assumptions

Under current circumstances, archaeological resources will continue to deteriorate through natural forces and from public use and vandalism if no corrective nor preventive

action is taken. Clearance will be required pursuant to 36 CFR 800.

Economic Conditions and Social Environment Assumptions

The socio-economic analysis is adequate to analyze local/regional social and economic effects; effects on the BLM San Luis Resource Area management costs; and effects on national values for recreation activities.

Currently there are no up-to-date models specific to the economic study area (ESA) that could be used to measure total employment and income changes for this plan. The Bureau of Economic Analysis Regional Input-Output Modeling System (RIMS II), however, has multipliers for Colorado, which are used in this analysis. The expenditure data was developed from studies by the U.S. Fish and Wildlife Service and other studies for Colorado (Table 4-1 and Table 4-2). Management will affect employment, population, and income in the area. Most of the effects occur because of impacts on the ranching sector, forestry sector, and retail and service sectors. These economic sectors will be affected by changes in grazing, forestry, and recreation opportunities occurring from the land uses in the plan. The potential economic impacts are insignificant as they relate to local and regional impact. Contributions to the ESA from recreation activities occurring on BLM land will be as follows: expenditure $2,177,870; output $4,608,373; earnings $1,498,157; and employment 119. Recreation activity employment (119) in the ESA will be less than 1 percent change. The expenditures for recreation (e.g., transportation, lodging, entertainment, eating, and drinking) are changes in final demand.

The expenditure data is used to measure economic effects on the ESA and national values are defined as the net economic gain from an activity. Expenditures are important to local and state economies, but they do not reflect the total recreation values of the resource, which include the personal benefits one receives from participation in that activity. Thus, national values measure these additional benefits. For example, the net gain or national values from a recreation activity are what the recreator is willing to pay over their actual costs to participate in the activity. Net gains are portrayed on an annual basis for this analysis.

These national values are estimates of "willingness to pay" (wtp). Wtp values are easy to determine when goods and services are bought and sold in well-defined markets. Recreation wtp values, however, usually have to be estimated from secondary sources (Table 4-1).

Table 4-1
DOLLAR VALUE PER RESOURCE UNIT

Resources	Unit	Dollar Value
Livestock	AUM	7.55[1/]
Deer hunting	AUs	47.86
Elk hunting	AUs	137.22
Antelope hunting	AUs	18.95
Other big game hunting	HDs	23.17
Waterfowl hunting	HDs	6.78
Warm water angling	ADs	3.76
Cold water angling	ADs	4.15
Dispersed recreation use	RDs	3.55
Nongame use (nature study)	RDs	8.58

[1/] The charge to livestock lessee is $1.54/AUM.
Source: Colorado BLM SAGERAM 1987 Price file.

No significant population change will result from land use allocation. The impacts tend to be site-specific and confined to a particular type of user group. Any decision will usually produce trade-offs with social advantages for some persons or groups and social disadvantages for others.

Some resource products on BLM land can be valued; others cannot. Dollar values can be assigned to timber and other resources (Tables 4-2 and 4-3).

All of these values were estimated as willingness to pay values. Some of the values were determined by observation of goods and services bought and sold in well-defined markets. For example markets exist for grazing; however, other resources such as recreation do not have established markets. These values were based on various willingness to pay studies.

Examples of other benefits not assigned monetary values include the value to future generations of protection and preserving cultural resources, the benefits of maintaining viable populations of wildlife species, and the satisfaction derived by those who do not have any intention of seeing these populations.

Mineral values are also not considered. Mineral activity on BLM lands respond mostly to changes in market prices over time, rather than to changes in land management plans. Price changes in minerals or the amount of minerals that can be produced in the future on BLM lands cannot be predicted. Thus minerals are not valued for the trade-off analysis, but are considered during the decision making process.

The BLM San Luis Resource Area management costs of $650,000 per year are not expected to change. The actual dollar amount may change because of inflation. In terms of 1987 dollars, however, the $650,000 is not expected to increase.

Special Plant and Animal Species Assumptions

In all cases, full compliance with Section 7 of the *Endangered Species Act* (1973) will be completed before invoking specific actions resulting from RMP decisions. This requires mandatory consultation and coordination with the USFWS and clearance of lands inhabited by these species. Inventory analysis and monitoring will be done for special

Table 4-2
ESTIMATED RECREATION NATIONAL ANNUAL DOLLAR VALUES BY 2007

Resource	Value	Base	Proposed Plan
OHV	8	151,520	173,613
Other Motor	8	71,360	85,578
Nonmotor	10	148,700	169,221
Camping	6	52,440	59,677
Hunting	70	986,300	1,155,070
Land Based	8	196,640	228,237
Fishing	4	151,240	172,111
Boating	13	16,380	17,753
Other Water	8	58,160	66,186
Winter Sports	18	3,600	4,916
Snowmobiling	8	4,240	4,825
Total		1.840.580	2.137.187
Cumulative Increase from Base			296,607
Percent Increase			16

Table 4-3
ESTIMATED NATIONAL ANNUAL DOLLAR VALUES BY 2007

Resource	Value	Base	Proposed Plan
Recreation [1/]		1,840,580	2,137,187
AUMs	8	259,200	259,200
Sawtimber Mfb	11	3,168	2,035
Cords of Wood	9	5,102	4,293
Total		2,108,050	2,402,715
Cumulative Increase			294,665
Percent Increase From Base			14

[1/] See Table 4-1

plant and animal species. Clearances for special plant and animal species will be completed for all proposed management actions.

Waterpower/Storage Assumptions

Waterpower/storage site withdrawals will continue to be made on sites that meet the qualifying criteria for waterpower/storage.

Location and evaluation of new waterpower/storage sites will continue and will be added to the inventory. Land acquisitions of waterpower/storage sites meeting the criteria will be completed as needed and subsequent waterpower/storage site withdrawals will be made where appropriate.

CONSEQUENCES

The analysis of consequences is presented by affected resource and resource use. If the cumulative consequences are not discussed, they are the same as the specific consequences for that affected resource or resource use.

Minerals Management

In this plan, 617,180 acres (99.5 percent) of Federal fluid mineral estate will be open for leasing and 3,620 acres (0.5 percent) will be closed to leasing. Appendix C identifies proposed lease stipulations for resource-specific requirements for stipulation waivers, exemptions, and modifications.

Tables 4-4 and 4-5 list this acreage by leasing category for oil and gas and geothermal resources.

As a matter of policy, fluid mineral operations will not be allowed within the 3,285 acres of riparian resources unless such activity could be fully mitigated to the satisfaction of the authorized officer. The implementation of this policy should not result in a significant impact to fluid mineral resources as all such areas are 300 feet or less in width. Some inconvenience may occur as a result of this requirement; however, no fluid resources will be lost.

Managing 6,260 acres of bighorn sheep lambing range under a no surface occupancy requirement will result in substantially higher (30 to 100 percent) drilling and development costs because directional drilling, if feasible, will be required. If for technological and/or economical reasons directional drilling could not be conducted, the potential fluid resources within these areas will be foregone. The seasonal use restriction on 17,034 acres of crucial antelope winter and fawning range will place a severe restriction on these lands as occupancy will be restrained from December 15 to July 15 of each year. This combination of seasonal use restrictions will only provide for occupancy from July 16 to December 14. The management of approximately 342,000 acres of crucial big game winter range and crucial waterfowl areas under a seasonal use restriction could result in higher exploration, drilling, and development costs in addition to potential scheduling problems.

The management of 2,640 acres of fluid mineral estate within the Rio Grande River Corridor ACEC including the wild and scenic segment, 2,000 acres within the Flat Top semiprimitive nonmotorized area, 760 acres of NRHP sites, 40 acres within the town of South Fork, 3,824 acres in the Cumbres Toltec ACEC, and 1,200 acres within the Pike Stockade/Monte Vista park R&PP sites will be under a no surface occupancy (NSO) stipulation. This management will result in substantial cost increases (50 to 100 percent) for exploration and development because of the requirement to use directional drilling, if possible, to access the

fluid mineral potential of these areas. If directional drilling were not feasible, the potential fluid resource of these lands will be lost.

All Federal fluid mineral estate will be available for leasing with the exception of the 320 acres within the incorporated town of Del Norte and the 3,300 acres of WSAs recommended for wilderness designation. Management of 258,536 acres under standard lease terms will ensure the exploration for and potential development of fluid minerals from these lands. The management of about 342,000 acres under a seasonal use stipulation will result in higher exploration and development costs and scheduling problems for the operator/lessee. Any increase in exploration and/or development costs could result in a potential loss of fluid mineral production in the planning area. A no surface occupancy requirement on 16,844 acres for recreation and wildlife will result in substantially higher drilling and development costs or possible loss of fluid resource from these lands. The adverse impact of this leasing stipulation will be especially significant in this planning area because of the limited fluid resource information currently available and the inability to obtain such information because of the exclusion of surface operations from these lands.

In this plan 601,443 acres (97 percent) of Federal minerals will be identified as open to entry and location and available for exploration and development under the general mining

Table 4-4
MANAGEMENT OF OIL AND GAS LEASES BY ACRES

Management Category	Nominal Potential	Low Potential	Moderate Potential	Total	Percent of Mineral Estate
Open					
Standard Lease Terms	18,061	237,945	2,530	258,536	41.0
Seasonal Restrictions	70,230	251,350	20,420	342,000	55.0
NSO or Similar Constraints	1,155	15,289	400	16,844	3.0
Closed					
Nondiscretionary[1/]				3,620	1.0
WSA lands[2/]				16,794	1.0

1/ City of Del Norte and recommended WSA lands contiguous to USFS lands.
2/ WSA lands pending Congressional decision

Table 4-5
MANAGEMENT OF GEOTHERMAL LEASES BY ACRES

Management Category	Low Potential	Moderate Potential	High Potential	Total	Percent of Mineral Estate
Open:					
Standard Lease Terms	225,766	30,360	2,410	258,536	41.0
Seasonal Restrictions	290,350	45,030	6,620	342,000	55.0
NSO or Similar Constraints	14,634	2,210		16,844	3.0
Closed:					
Nondiscretionary				3,620	1.0
WSA recommended lands				16,794	

laws. The continuation of existing and new withdrawals of the Blanca Wildlife Habitat/Special Recreation Management Area (9,147 acres) and the Pike Stockade and Monte Vista R&PP sites (1,200 acres), as well as the U.S. Forest Service administrative sites (200 acres), the Rio Grande Wild and Scenic River segment (2,640 acres), six eligible NRHP sites (760 acres), and WSAs recommended for wilderness designation (3,300 acres) should not result in a significant impact because of the low potential of the areas for locatable minerals. Total acres closed to mineral entry and location will be 17,247 (3 percent). The closure of 2,000 acres of OHV use and the designation of ACECs encompassing a total of 131,380 acres of Federal lands will result in increased cost and inconvenience for mining claimants/operators because of the requirement for filing and approving a plan of operations.

In this plan 599,371 acres (97 percent) of the planning area are open to the disposal of mineral materials with a minimum of timing restrictions. Mineral material resources from these lands will be available to private and governmental agencies through sale or free use. The management of about 342,000 acres (55 percent) of the planning area under a season of use limitation could result in scheduling inconvenience and loss of mineral material resources. The cost of capital improvements, which cannot be utilized throughout the year, could result in the cost of production becoming too high and resource use uneconomical. Impacts from seasonal use limitations could be significant in the Los Mogotes and San Luis Hills area because of the moderate to high potential of these areas for cinders and the limited resource of this type available in the planning area. The following areas, WSAs (3,300 acres), town of Del Norte (320 acres), Rio Grande River Corridor ACEC (2,640 acres), Cumbres Toltec Corridor ACEC (3,824 acres), Flat Top Mountain (2,000 acres), bighorn sheep lambing area (6,260 acres), and riparian areas (3,285 acres) are unavailable for mineral materials disposal. A total of 21,629 acres will be precluded from development.

Paleontological Resources

All the significant resources, vertebrate and invertebrate, will be protected and developed for public education opportunities and research. These significant locations will be retained in public ownership and closed to OHV, surface occupancy, and other physical disturbance. Offering a selected site (i.e., the Clayton Cone area) to the interested public as special educational and collecting areas will enhance the overall understanding and protection of these resources.

Riparian Resources Management

Riparian condition will remain good to excellent on approximately 1,400 acres. Management objectives to improve riparian zones will result in expected improvement in the vegetation condition on 275 acres. An additional 180 acres in poor condition will improve if both sides of the Rio Grande River Corridor SRMA could be fenced.

Acquisition and development of historic wetlands, development of wetlands currently managed by BLM, and acquisition and management of other riparian areas will increase riparian acreage. This will provide a more diverse and productive environment and benefits to all resource users. A net increase will occur; however, some wetlands in scattered tracts could be lost because of land ownership adjustments. Development of historical wetlands for wildlife habitat will provide an additional 1,370 acres of riparian vegetation.

Any large scale development of locatable minerals in riparian zones will cause a decline in condition. Increased recreation use and consequent OHV use will also result in a decline in condition where recreation use is concentrated.

Inventory of an additional 1,413 acres will allow for recognition of riparian values in future management actions.

The 15-acre isolated tract on Kerber Creek will remain in poor condition because of limited BLM-administered land and related manageability problems.

Approximately 1,300 acres will be closed to mineral entry for locatable minerals because of protective measures for other resources (e.g., WSAs, Blanca WHA, Rio Grande River Corridor including the wild and scenic portion, etc.). The 43 CFR 3809 regulations will prevent undue and unnecessary damage to the vegetation on the remaining acres. Losses of vegetation and a reduction in water quality will be expected, however, if any large scale development occurs.

Changes in grazing practices will help improve 205 acres of riparian vegetation currently in poor or fair condition. Conformance to most existing grazing management plans will maintain good or excellent condition on 1,400 acres. Incorporating riparian objectives into allotment management plans will result in benefits to riparian vegetation on the uninventoried 1,413 acres.

Development of historic wetlands for wildlife and fisheries habitat will improve and/or expand 1,370 acres of riparian vegetation in Blanca WHA, Dry Lakes, and Flat Top ponds.

Emphasis on acquisition of riparian areas will be increased to enhance management capabilities by consolidating ownership and providing additional acres of riparian vegetation.

Designation and management of the Trickle Mountain ACEC, Blanca ACEC/SRMA, and Rio Grande River Corridor ACEC/SRMA including the wild and scenic portion

might provide an incentive for expansion and/or improvement of riparian vegetation in these areas.

Development of new recreation sites will result in some permanent loss (10 to 20 acres) of riparian vegetation. Increased recreational use along the Rio Grande River Corridor SRMA including the wild and scenic portion will cause localized disturbance from trampling and OHV use. Limited OHV designations on 3,285 acres will help prevent degradation in riparian zones. OHV limitations, however, are often disregarded, and new trails and roads could occur through some riparian zones. Since riparian zones are a focal point for dispersed recreation, as this type of recreation increases, trampling of the vegetation and OHV traffic will also increase. Some decline in riparian condition will be expected in localized areas, especially where recreation receives special emphasis.

Protection of *Cleome multicaulis,* which is dependent on saturated soils, will preserve small areas of riparian vegetation. Enhancement of habitat for this plant will expand riparian zones by a small amount. Any improvement or expansion of bald eagle feeding habitat will improve or increase riparian vegetation.

Livestock Grazing Management

Forage production will potentially increase by an estimated 10,000 AUMs on the allotted lands based on expected grazing management improvements during the 20-year life of the plan. These increases would be divided between livestock (4,000 AUMs) and nonlivestock uses (6,000 AUMs for wildlife, soils, watershed, etc.), if needed. The net effect will likely benefit livestock grazing management as well as the nonlivestock uses within the resource area.

During the life of the plan, there also could be an estimated 30,000 more acres (of the approximate 42,000 acres of unallotted lands) that very likely will become suitable production acres. This potentially will provide for an approximate additional 1,500 AUMs that will be allocated between livestock (600 AUMs) and nonlivestock use (900 AUMs) with a net beneficial effect to livestock. This will occur after thorough vegetation resource base monitoring.

Incorporating riparian objectives into AMPs could potentially result in additional limitations on livestock operators, increases in operational costs, and temporary loss in AUMs authorized.

Seasonal limitations to OHV use on approximately 390,000 acres (76 percent) and closures on 11,584 acres (2 percent) will reduce damage to vegetation and management problems created by use of roads in the spring.

The overall net effect to livestock grazing management in the resource area could be an increase of available forage by about 4,600 AUMs over the span of this land use plan.

Wildlife and Fish Habitat Management

Significant habitat quality increases will occur on 9,147 acres as a result of intensive wetlands management on 1,600 acres and the restoration of 1,175 acres of historical wetlands within the Blanca ACEC. Numbers of water birds produced will increase significantly. Extensive management will improve conditions on 155 acres of wetlands in the Rio Grande River Corridor, Flat Top, Mishak Lakes, and Dry Lakes area. Interagency cooperation could restore 580 acres of historical wetlands in the previously mentioned areas contributing significantly in approaching the target numbers in the draft DOW water bird plan for the San Luis Valley.

Allocation of 60 percent of the additional forage produced to nonlivestock use, if needed, will improve nongame habitats. Existing crucial big game wintering areas will be maintained or slightly improved.

Minimized disturbance through restrictive use stipulations on big game crucial winter range and birthing areas, bald eagle roosting habitat, raptor nesting habitat, and water bird nesting habitat will decrease stress. Condition and health will improve and mortality and birthing losses will decrease for the affected species on approximately 342,000 acres. Other benefits include improved distribution and decreased big game utilization of adjacent private lands.

Lambing range and 2,830 acres of raptor nesting areas along the Rio Grande River Corridor will be protected by no surface occupancy stipulations. Approximately 333,000 acres of crucial big game winter range and 9,147 acres of crucial water bird production areas will be protected with seasonal limitations. NSO and seasonal limitations on crucial winter range will reduce stress on big game populations, thereby reducing mortality and fetal losses and improving the overall condition and health of the herds.

The withdrawal on the Blanca ACEC will protect 9,147 acres of wetland habitat. The withdrawal of 2,640 acres on the wild and scenic portion of the Rio Grande River Corridor ACEC will enhance wildlife values, particularly raptor habitat.

The exclusion of mineral material sales in the Rio Grande River Corridor ACEC (2,640 acres), including the wild and scenic segment, defined riparian zones (3,285 acres), part of the Flat Top portion (2,000 acres) of the San Luis Hills ACEC, and bighorn sheep lambing areas (6,260 acres) would protect the values on approximately 14,000 acres. Seasonal limitations would be placed on approximately

333,000 acres of big game crucial winter range and 9,147 acres of wetlands. These limitations would reduce stress to big game populations during the critical period of use.

Restoration and protection of 3,285 acres of riparian habitat would provide additional forage and cover for big game, waterfowl, and nongame species. The prey base for raptors and other predators would be improved. In-channel structures and improvements would provide food and habitat for waterfowl, big game, and nongame species.

Forage conditions on big game crucial winter range would generally improve with continued development of grazing systems and improved management practices. Conflicts would also be reduced between livestock and wildlife on crucial big game winter ranges.

Both thermal and cover requirements for big game on 5,769 acres of commercial forest lands will be maintained, and in some areas present conditions will be improved within these stands. Seasonal limitations in bighorn sheep lambing areas should maintain present lambing levels. Limiting individual winter harvest timber operations to 80 acres or less of crucial winter range between December 15 and March 31 should not cause major impacts to wintering big game.

Designation and management of Los Mogotes, Trickle Mountain, San Luis Hills, Rio Grande River Corridor, and Blanca as ACECs will have a positive effect on wildlife values. ACEC designation of other areas (e.g., Ra Jadero Canyon, Elephant Rocks, Sand Castle, and Cumbres and Toltec Scenic Railroad Corridor) will generally enhance wildlife values. Management under an SRMA designation on the Blanca ACEC and Rio Grande River Corridor ACEC will complement both recreation and wildlife.

SRMA designation for the Rio Grande Corridor will enhance and protect 4,595 acres of unmanaged waterfowl and raptor habitat. Limited OHV designations (travel restricted to designated roads) will maintain existing habitat on 131,400 acres. A limited OHV designation will reduce stress to wildlife on 342,000 acres during critical periods. Stress will also be reduced on wildlife on 5,300 acres, which are closed to OHV travel. Habitat destruction and the disturbance and harassment of wildlife will occur on approximately 173,400 acres of BLM land open to OHV use, which includes the remaining winter habitat for big game. The Rio Grande River Corridor SRMA includes the 2,640-acre segment recommended for wild and scenic designation.

Placer operations, which involve dredging, vegetation removal, and streambank disturbance, will have adverse impacts on aquatic habitat systems. Water quality, water temperatures, bank and channel stability, and sedimentation will all be potentially adversely affected by these management actions.

Restoration and protection of 1,370 acres of riparian habitat will maintain the aquatic habitat in its present condition where the trend is stable. Structures placed in Ford Creek and La Garita Creek will improve pool/riffle ratios, stabilize streambanks, increase in-stream cover, and reduce channelization, streambank erosion, and sedimentation on 4.0 stream miles.

Intensive grazing management on 22 miles of stream aquatic habitat will improve aquatic conditions as a result of improved riparian habitat along the Rio Grande River Corridor ACEC, including the 2,640 acres within the wild and scenic river corridor.

Road construction across aquatic areas could increase sedimentation, streambank degradation, and water temperatures and decrease streambank cover.

Acquisition of additional stream miles of aquatic habitat will occur. Disposal of aquatic habitat will not occur except for lands within the San Luis Lakes and Mishak Lakes area, which would go to NPS, DPOR, DOW, and/or USFWS. Designation of Trickle Mountain, Blanca SRMA, and the Rio Grande River Corridor as ACECs will protect and enhance aquatic values. Closing areas along streams to OHV use will maintain or improve aquatic habitat. The net impact will be beneficial to aquatic habitat.

Forest and Woodland Management

Managing 5,769 acres (98 percent) of commercial forest lands for a sustained-yield, long rotation forest management program will result in offering for sale an annual harvest volume of 185 Mbf and replacement of 34 acres annually through regeneration harvest. A long rotation forest management program will allow for the development of a regulated forest with the older age classes possessing old growth characteristics. Natural components of the various habitat types will be maintained and visual quality objectives will be maintained more easily. Annual harvests of forest products will improve the existing age class distribution and increase growth rates by reducing impacts of forest pests and implementing intensive management practices. Species diversity will be maintained, and legal and physical access would be increased.

Seasonal limitations on harvest in bighorn sheep lambing areas will reduce sale marketability on 335 acres of productive operable woodlands and 85 acres of commercial forest land. The requirement to maintain adequate thermal cover on 17,761 acres of forested land will reduce the effectiveness of forest pest control projects.

Special harvesting techniques necessary to maintain the existing values in six ACECs will not reduce total final harvest volumes, but will increase costs for each sale.

Management of wildlife habitat, ACECs, cultural resources, and visual resources will maintain the commercial forest or productive operable woodland allowable harvest base acreage. Seasonal limitations on harvesting will reduce or preclude bidding on some tracts. Residual low quality and pest infested stands probably will not be treated nor placed into productive management without a successful sale program and will result in reduced harvest levels.

Approximately 345 acres of commercial forest land (CFL) and 1,794 acres of productive operable woodlands (POW) are located in WSAs. Because of steep terrain, the 345 acres of CFL would not be included in the harvest base level even if the WSAs are not designated wilderness.

Four hundred and ninety acres of productive operable woodlands are located in two WSAs, which have been recommended for wilderness designation. Withdrawing these acres will reduce the annual harvest level by 27 cords (3 acres). A total annual harvest of 477 cords of fuelwood could be produced from 11,992 acres (53 acres annually) of productive operable woodlands if the WSAs not recommended for wilderness designation are returned to multiple use management.

Lands and Realty Management

Emphasis will be placed on acquisition of lands with significance for special plant and animal species, wildlife habitat, cultural values, riparian areas, public access, and recreation areas (especially along the Rio Grande River Corridor ACEC/SRMA).

Acquisition could enhance forest and woodland management, livestock management, and minerals management.

Lands with special plants and animals, cultural values, riparian areas, public access, significant wildlife habitat, and recreation areas will not be available for disposal unless the benefits acquired will equal or exceed the benefits lost. Disposal of isolated tracts will improve manageability and perhaps enhance one or more other resources if disposal of an isolated tract will result in acquisition of a desired resource value. Exchanges will be used to consolidate large blocks of BLM-administered land.

Existence of a few mining claims and the foreseeable level of fluid mineral operations may be an insignificant impact to land disposal and rights-of-way routing. Eliminating mineral activities through withdrawals on the six cultural sites, 560 acres, will have an insignificant effect on mining because the six sites are within low mineral potential areas.

Full mitigation or re-routing of rights-of-way for riparian resources will be an insignificant economic impact with only slightly increased costs. Impacts from land disposal will be insignificant to livestock operations on BLM-administered lands in the San Luis Valley. The majority of 5,300 acres available for disposal under Category I are presently not leased for livestock operations.

Land disposal will have a minimal positive impact to payments in lieu of taxes (PILT) because disposal of 5,300 acres and potential acquisition of a much larger amount of land should increase PILT payments to counties over the life of the plan. The net effect will be to increase revenues to the counties. All withdrawals for protection of wildlife habitat and recreation areas will be retained. All six cultural sites, which are eligible for NRHP, will be withdrawn to protect these values.

Full mitigation of impacts will be necessary for the following sensitive resources: special plants and animals, wilderness and recreation areas, cultural, riparian areas, public access, visual, and wildlife habitat.

Construction of rights-of-way during compatible times of the year for wildlife could constrain development and increase the cost of some projects. Identifying 131,000 acres of ACECs as avoidance areas for major rights-of-way will not impact lands and realty management. The net effect of land disposals and acquisitions will have a minimal positive effect on special status plants/animals, wildlife, cultural, and riparian values.

ROWs or corridors will be authorized in 23,299 acres of semiprimitive nonmotorized areas. All other ROWs must be compatible with recreation opportunity spectrum (ROS) guidelines.

Designation of right-of-way corridors may result in increased impacts within the corridor because of concentrated use; however, impacts outside the corridor will be reduced or eliminated. The net effect will be no impacts.

Areas of Critical Environmental Concern

Wildlife, recreation, scenic, cultural, wild and scenic river, and other unique values will be given special attention on 131,380 acres (93 percent) of the total 141,681 acres identified for special management. These areas are Sand Castle, San Luis Hills, Blanca, Trickle Mountain, Cumbres and Toltec Scenic Railroad Corridor, Elephant Rocks, Ra Jadero Canyon, Los Mogotes, and the Rio Grande River Corridor ACECs. Special management to protect wildlife, recreation/ scenic, cultural, and other unique values on the remaining 10,301 acres (7 percent) will not occur.

The proposed ACECs that currently have other designations, such as the Cumbres and Toltec Scenic Railroad (a National Register property), will be designated ACECs in addition to their present designations. The use of the ACEC designation, however, will not affect prior status.

Recreation Management

An NSO stipulation on the Rio Grande River Corridor ACEC and the SPNM portion of Flat Top in the San Luis Hills ACEC will protect 4,640 acres from surface-disturbing activities. Mineral withdrawals on the Blanca and Rio Grande River Corridor ACECs and the Pike Stockade/Monte Vista R&PP sites will protect 12,987 acres from mineral entry. Mineral materials will be unavailable for disposal on the 2,640 acres in the Rio Grande River Corridor ACEC, the 3,824 acres in the Cumbres and Toltec Scenic Railroad Corridor ACEC, and a 2,000-acre portion of SPNM on Flat Top (8,464 acres total). A nondiscretionary closure on the WSAs recommended for wilderness designation will protect 3,300 acres of wilderness values from mineral leasing. These acres will also be closed to disposal of mineral materials.

Intensive recreation management of Blanca, Penitente Canyon, Zapata Falls, and the Rio Grande River Corridor SRMAs will enhance recreation opportunities on 27,573 acres (5 percent). Extensive recreation management will maintain recreation opportunities on the remaining 493,104 acres (95 percent).

Management of a portion of Segment A and all of Segments B and C of the Rio Grand River Corridor as an SRMA will enhance recreational opportunities on 2,760 acres.

Table 4-6 shows OHV designations by acreage and percent of planning area.

22-mile segment of the Rio Grande River Corridor ACEC will reduce boating use, but will preserve the primitive setting.

Additional public land gained through access acquisition and road development and improvement will increase camping, hunting, sightseeing, four-wheeling, snowmobiling, and cross-country skiing opportunities. Temporary disruption of dispersed types of recreation activities could occur on 150 acres annually.

Management of the Sand Castle Area, San Luis Hills, Ra Jadero Canyon, Los Mogotes, Elephant Rocks Area, Cumbres and Toltec Scenic Railroad Corridor, Blanca Area, Rio Grande River Corridor, and Trickle Mountain ACECs will enhance and improve recreation opportunities on 131,380 acres. A primitive and wilderness type experience will be potentially available on 2,640 acres of the Rio Grande River Corridor ACEC if designated as wild and scenic by Congress.

Some minor affects on public land recreationists may occur from limiting OHV travel to designated roads and trails on BLM-administered lands within ACECs. Cultural and OHV conflicts will be addressed in detail in the site-specific CRMAP for Sand Castle with emphasis on protection of cultural and ecological values.

Significant recreational opportunities will be enhanced on Blanca, Penitente Canyon, Zapata Falls, and the Rio Grande River Corridor SRMAs. Wildlife related recreation activities in these SRMAs will be maintained. River-based recreation activities will be encouraged on 29 miles of the Rio Grande River Corridor SRMA. Protection of the semi-primitive character of Flat Top (2,000 acres) and the wilderness characteristics on 3,300 acres will occur. Dispersed recreational opportunities in the San Luis Extensive Recreation Area will be enhanced.

Table 4-6
OHV DESIGNATION

Designation	Acres	Percent
Open	173,377	33
Limited	342,000	66
Closed	5,300	01
TOTAL	520,677	100

Enhancement and maintenance of vegetation condition within of 1,735 acres (54 percent) of riparian zones will benefit recreationists seeking scenic and educational opportunities.

Management of the Blanca and Trickle Mountain ACECs, crucial winter ranges, birthing areas, and riparian habitat through seasonal OHV limitations will improve opportunities for hunting, fishing, and wildlife observation. Protection of nesting waterfowl and birds of prey in the

Wild and Scenic River

Designation of Segments B and C of the river (2,640 acres/ 22 miles), by Congress as an element of the National Wild and Scenic River System, could have an overall positive effect on the San Luis Valley. If this designation were to take place, the corridor, with its significant outstandingly remarkable wildlife and other related values, would be maintained, and potentially enhanced, in perpetuity for the use and enjoyment of future generations.

Designation of Segment B (scenic) and C (wild) would close 2,640 acres to surface mineral development. Since the area is low in mineral potential and the physical configuration of the unit is narrow, adverse impacts of designation on mineral development will be minimal. The Rio Grande River Study Report, Appendix A, page 7 has additional analysis on mineral resources.

Funding for management of the corridor will potentially increase through designation. Additional funds will allow enhancement of riparian resources through protection and improvement of the riverine environment (especially in Segment B). Wild and scenic designation will require increased livestock management attention to the corridor. Control of unau horized livestock use in the corridor will be needed to protect and enhance the riverine environment.

Opportunities for additional protection and enhancement of the outstandingly remarkable wildlife values will occur as a result of wild and scenic designation and anticipated funding increases. Designation may also increase funding for some fishery improvement work, which may minimally enhance sport fishery habitat.

Acquisition of land through exchanges or through the Land and Water Conservation Fund will receive increased attention if the area is designated as wild and scenic. Administrative designations of the corridor as an area of critical environmental concern (ACEC) and special recreation management area (SRMA) will provide special management emphasis. These designations, however, will not protect and maintain the free-flowing conditions nor preserve the outstandingly remarkable qualities to the degree of a wild and scenic river designation.

Designation will preserve and enhance primitive recreation values by directing management emphasis and funding to the area and by ensuring long-term protection to the river environment. Designation, however, will also slightly increase recreation visitation to the area, creating additional visitor management problems. Some insignificant adverse impacts to the physical environment will occur from increased recreational use. Because Segment C is so critical for willdife, even minor increases in recreational use, if not properly regulated, could result in moderate impacts to wildlife.

A detailed analysis of the effects of wild and scenic designation will have on water rights is contained in Appendix A. The following effects will occur: 1) The Rio Grande River Compact will not be affected. 2) The Federal government will acquire a water right junior to approximately 16,000 other senior adjudicated water rights in an extremely over-appropriated drainage. 3) Water users/developers will continue to be uneasy because the Federal government will have a right to expect conditions to remain the same as at the time of wild and scenic designation by Congress. Because the Federal government right will be very junior, any proposed change of existing use that would affect existing flows would also receive objections from many of the 16,000 senior water right holders. At most, therefore, the Federal reserved right will be a nuisance transactional factor for water users. 4) BLM states that "existing conditions" are sufficient for the perpetuation of significant river values. BLM also states that any additional water needs will be adjudicated according to Colorado State Water Law. Valid existing rights, therefore, will not be affected by designation. 5) Wild and scenic designation may serve to help perpetuate an agrarian lifestyle in the San Luis Valley by helping to prevent diversion of water from the valley to out-of-basin users. Appendix A, pages 9 and 18, have more detailed analysis on effects to water rights by wild and scenic designation.

Wild and scenic designation of the Rio Grande River will have a positive effect on the economy of the San Luis Valley. Designation could also slightly increase recreation visitation to the area, creating additional visitor management problems and minor adverse impacts to the physical environment. Tourism boards, towns, and counties could market the congressionally designated area along with the other natural attractions in the San Luis Valley. Land values for properties adjacent to the corridor will likely rise slightly. An unquantifiable economic gain could occur as a result of potential positive effects from residual tourism.

Visual Resource Management

Proposed surface-disturbing activities will meet the allowable class objectives in existing class II, III, and IV areas. Existing objectives will be changed as follows: (1) The foreground area of that portion of the Rio Grande River Corridor designated as an ACEC (22 miles) will be changed from VRM Class III to II, which will result in improvement of VRM resources in class III areas; (2) all public land west of U.S. Highway 285 will be changed from VRM Class II to III, which will result in degradation of visual resources in class II areas.

Strict application of VRM Class II objectives will protect and enhance visual resources in the Cumbres and Toltec Scenic Railroad ACEC (3,824 acres) and the Rio Grande River Corridor ACEC (22 miles/2,640 acres).

A restoration project, designed to correct and improve the visually contrasting class IV Blanca Chaining area to VRM Class III objectives, will be implemented on 2,375 acres during the life of the plan. Over the long term, the chaining area will be improved to class II. For more detail refer to Appendix F of the draft RMP/EIS.

Conformance to VRM class objectives will protect visual resources. Mineral development could be expected to alter landscapes in a few localized viewsheds.

Forest harvest on 1,660 acres of VRM Class II land in scattered localized viewsheds would result in minimal impact over a period of 120 years. Woodland harvest in a dispersed pattern on 7,685 acres of VRM Class II land will result in minimal impact over a period of 175 years. The effect from this harvest will be much less during the 15- to 20-year life of the plan. Annual harvests of approximately 477 cords of fuelwood from 53 acres of productive operable woodland will be concentrated in the Blanca Chaining area. This proposed project will reduce the contrast of the chaining in the short term to class III and in the long term to class II.

Development of a major utility corridor west of U.S. Highway 285 will result in managing some VRM Class II land as VRM Class III, and degradation of visual resources will occur.

ACEC designation will protect the scenic values on 18,410 acres of VRM Class II land and 77,255 acres of VRM Class III land.

Visual resources on 95,000 acres (65 percent) of VRM Class II land and 5,300 acres (23 percent) of SPNM will be protected by OHV closures and limitations. Scenic quality will be altered on approximately 173,000 acres (34 percent) that is open to OHV use, and the potential for irreversible adverse impacts will increase.

Managing 24 percent of the planning area (125,948 acres) as VRM Class II will protect outstanding visual resources. These lands include the areas of scenery that provide significant recreational opportunities. Managing the remainder of the area as VRM Class III or VRM Class IV will maintain the overall visual character of the planning area, but will allow for visually contrasting projects or disturbances within scattered localized viewsheds. The Blanca Chaining project could restore 2,375 acres of class IV to VRM Class III. Wilderness designation will protect the scenic values on 3,300 acres.

Scenic values will be protected on 2,640 acres in the 22-mile portion of the Rio Grande River Corridor designated as an ACEC. More intense recreational use will be encouraged on Segment B (14 miles) of the river corridor. The semi-primitive nonmotorized setting will be protected on approximately 2,000 acres of Flat Top.

Historical Resources

All 18 identified historical significant sites will be protected. Those five sites eligible for inclusion in the National Register of Historic Places will be enhanced and protected under a "scientific use," "public use," or "management use" category, as well as an NSO. The Cumbres and Toltec Scenic Railroad will receive additional protection through special management as a ACEC and NSO.

Archaeological Resources

All significant sites will be protected. Eligible site/districts will be enhanced and protected under "management," "scientific," or "public use" categories. Sand Castle Area will receive additional protection through an ACEC designation and the 200-acre Folsom site has an NSO stipulation.

Fire

Full suppression, including wildfires, within the resource area is not expected to affect any sensitive resources (i.e., WSAs, areas susceptible to soil erosion, special plant and animal areas, and ACECs) to any great degree. The overall very low fire occurrence and intensity would probably result in minimum negative effects. During the annual review of the Cañon City District Fire Management Activity Plan, this full suppression decision will be re-evaluated. Even under a full suppression decision, the district fire management activity plan has very specific protective criteria for sensitive resources.

Fire may or may not ever be recommended for the purpose of altering the visual landscape or manipulating the vegetation on BLM-administered lands. At present no prescribed fire use areas have been identified. Prescribed fire may be addressed as a management tool in the future in the district fire management activity plan. If this were to occur, the required burn planning and NEPA documentation would need to occur prior to activity on the ground. Given the low fire occurrence and the low intensity of fire in the SLRA, the potential for the use of fire is very low.

Economic Conditions and Social Environment

Local and regional social and economic impacts, national economic values analysis, and impacts on the BLM San Luis Resource Area management costs are addressed in this analysis.

Stipulations placed on fluid mineral leasing will not have measurable economic or social impacts. Any increased

operating costs resulting from the stipulations will lower the potential for economic production. In addition, economic benefits associated with the unknown oil and gas potential will not be achieved.

Closing 17,247 acres to mineral entry will not likely have an impact on the local economy since these withdrawn lands have a very low potential for locatable minerals. The unavailability of 21,629 acres for disposal of mineral materials will not have an economic or social impact because of low resource potential in the planning area. Current trend and condition associated with management of 32,400 AUMs will be maintained. No net increases nor decreases will occur.

Increases in forage supply will result in increased game populations in crucial areas and associated recreational activities and could increase area income and employment. An increase of one job will be expected. Slight improvement of aquatic habitat and increase in angler days will be expected; however, the impact on economic and social conditions in the planning area will be less than 1 percent.

Sale of 185 Mbf of sawtimber represents no increase. The sale of 477 cords of fuelwood will help offset residential energy costs and produce about $4,293 in Federal revenue. Local employment and income will benefit to the extent purchases will be made by commercial fuelwood cutters.

Land ownership adjustments will occur on a case-by-case basis; therefore, it is not possible to predict any impacts on economic or social conditions. Social and economic benefits for any given proposal will be addressed in appropriate NEPA documentation.

Economic benefits from recreation will be less than 1 percent and will be concentrated on those businesses providing tourist and recreation sales and service. Available jobs will increase from 118 to 119.

The cumulative impacts on the local economy will likely be beneficial, but not large.

The BLM SLRA costs can be compared to the benefits over time using 8-7/8 percent discount rate. The ratio of national value compared to the cost is 3.42. Benefits were only those measured in the national income tables.

BLM SLRA management costs are $650,000 per year compared to benefits of $2,402,715.

Table 4-3 (Assumptions for Analysis in this proposed RMP) shows impacts to national values from measured activities within the planning area. The national values for these activities will be expected to have a cumulative increase of about 14 percent over the base. The total impact to national values from recreation, range, and forestry will be about $2.4 million.

Special Status Plant and Animal Species

Acquisition of lands containing swales and lake beds will enhance *Cleome multicaulis* communities. Old wells will be cleaned and new wells will be drilled on currently dry areas to increase the habitat and *Cleome* will be propagated on new wetlands. Appropriate livestock grazing management will result in a net increase of *Astragalus ripleyi* population. Riparian and wildlife developments will result in a net benefit to special plants.

Intensive studies, surveys, and analysis conducted in potential habitat areas for special animal species, especially for the black-footed ferret, will increase habitat and populations.

Waterpower/Storage

Intensive management of all potential sites with withdrawn land will protect waterpower/storage values. The exceptions are the sites within the Rio Grande River Corridor ACEC (2,640 acres), which is suitable for wild and scenic designation.

Waterpower/storage development potential will be reduced as a result of wild and scenic designation; however, these sites will also be restricted by the Alamosa National Wildlife Refuge.

CUMULATIVE IMPACTS

The overall cumulative effects of the Resource Condition, Land Use Allocation, and Management Action Decisions in chapter 3 are described here and on Table 4-7.

-3.0	-2.0	-1.0	0	+1.0	+2.0	+3.0
High	**Medium**	**Low**	**None**	**Low**	**Medium**	**High**
	Adverse Impacts (Negative)		**Net Impacts**		**Beneficial Impacts (Positive)**	

The overall effect on paleontological resources, riparian resource management, livestock grazing management, wildlife and fish habitat management, lands and realty management, areas of critical environmental concern, access and transportation management, wild and scenic rivers management, recreation management, visual resource management, historical resources, archaeological resources, economic conditions and social environment, special status plant and animal values is a low to medium beneficial or positive impact. The overall effect is a low adverse or

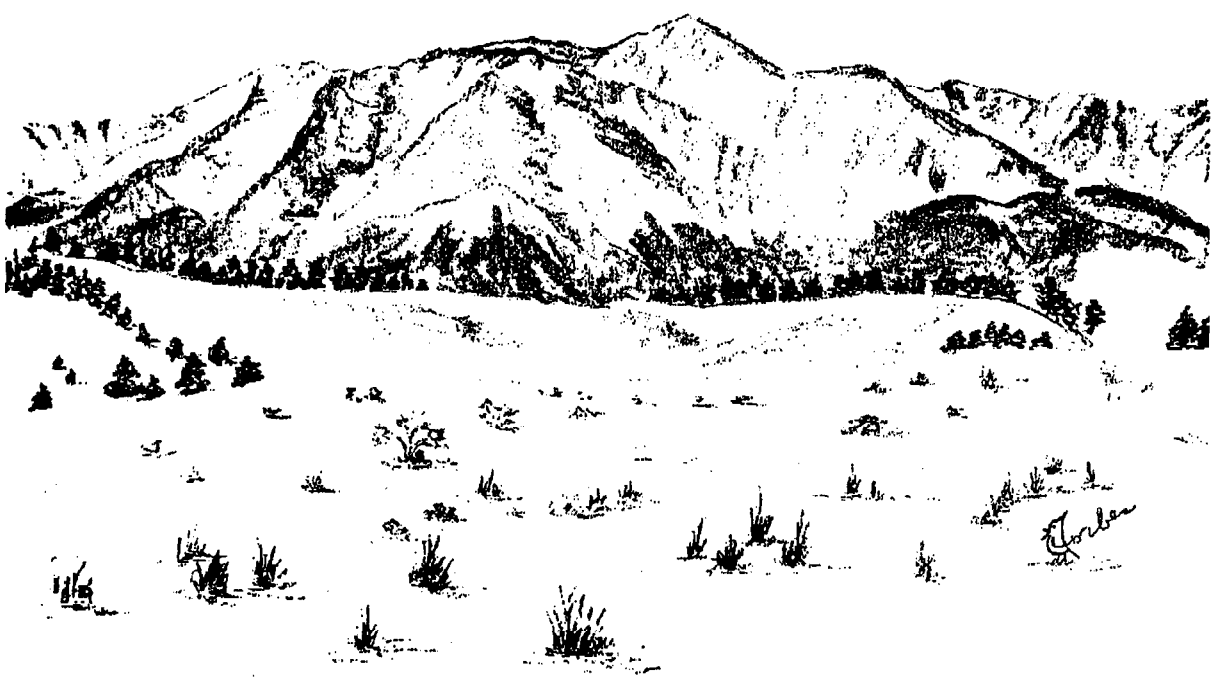
negative impact on minerals management, forest and woodlands management, and waterpower/storage.

The figures for Table 4-7 were developed using the adverse impact and beneficial impact scaled ratings, which are based on current management.

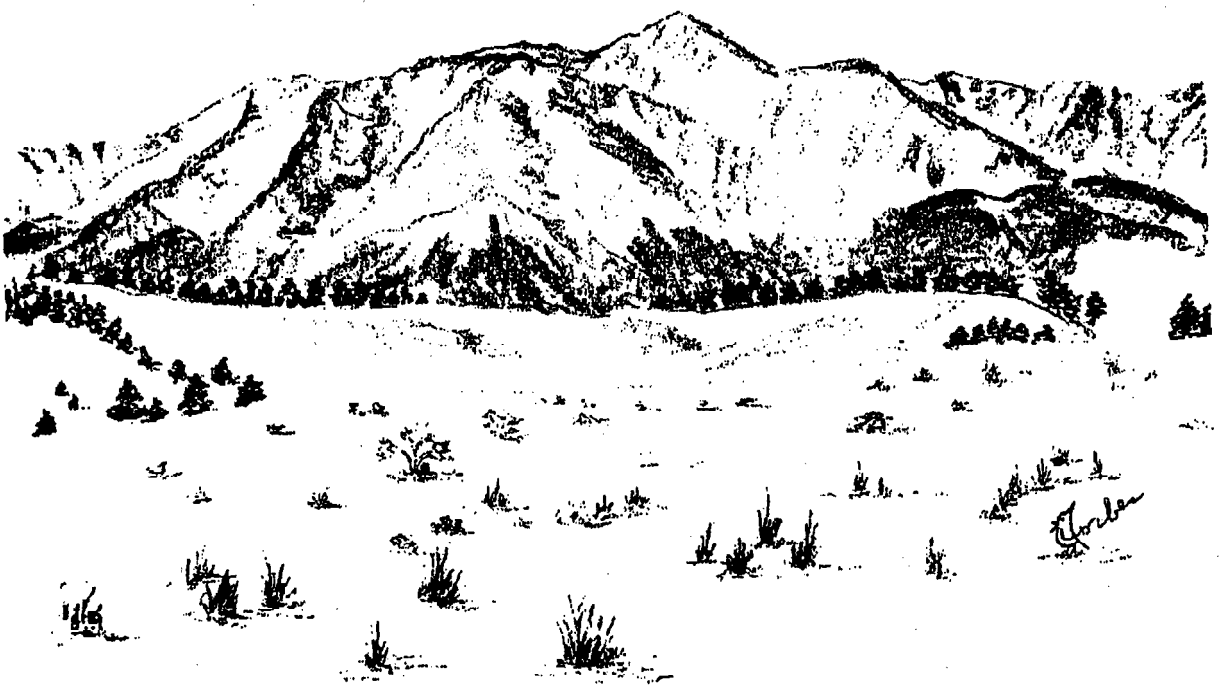
Table 4-7
SCALED PROPOSED PLAN CONSEQUENCES

Decisions	Proposed Plan
Fluids Minerals Management	-1.0
Locatable Minerals Management	-0.5
Mineral Materials Management	-1.0
Paleontological Resources	+2.0
Riparian Resource Management	+2.0
Livestock Grazing Management	+1.5
Wildlife and Fish Habitat Management	+1.5
Forest and Woodlands Management	-0.5
Land and Realty Management	+1.0
Areas of Critical Environmental Concern	+1.5
Access and Transportation Management	+1.0
Wild and Scenic River Management	+1.0
Recreation Management	+1.5
Visual Resource Management	+1.0
Historical Resources	+0.5
Archaeological Resources	+1.0
Economic Conditions and Social Environment	+1.0
Special Status Plant and Animal Species	+2.5
Waterpower/Storage	-0.5

APPENDICES



APPENDIX A
RIO GRANDE WILD AND SCENIC RIVER STUDY REPORT



Revised February 1991

DIFFERENCE BETWEEN STUDY REPORT AND RMP RECOMMENDATIONS

All 41 miles of the Rio Grande River study corridor have been determined eligible by the wild and scenic river study team because of new information on wildlife values/visual resources/ scenic viewshed/recreation values. The study team stated, however, that Segment A would be considered suitable if 1) the U.S. Fish and Wildlife Service (USF&WS) supported designation of this segment and 2) an agreeable cooperative management plan among USF&WS, BLM, and landowners could be developed.

In subsequent discussions with USF&WS, serious concerns were raised regarding their ability to properly manage and develop the refuge to meet their wetlands and waterfow objectives should the refuge portion be designated as wild and scenic. Furthermore, because BLM controls so little of the river frontage, BLM management believes it would be extremely time consuming and costly to achieve cooperative management. The final management determination for the Rio Grande River, therefore, is as follows: Segments A, B, and C are determined eligible; Segments A and B are classified scenic, and Segment C is classified wild. Segments B and C are suitable; however, Segment A is not.

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APPENDIX A

RIO GRANDE WILD AND SCENIC RIVER STUDY REPORT

1. INTRODUCTION

General

This Rio Grande Wild and Scenic River (W&SR) Study Report has been extensively revised from the report included in the San Luis Draft Resource Management Plan/Environmental Impact Statement (DRMP/EIS).

Chapter 1 of this report describes the study background, roles and authorities, study segments and area boundary, and relationship of the *Wild and Scenic River Act* to private lands. Chapter 2 discusses the general setting of the river corridor, the land uses/resource description including a section on constraints to management of the corridor. Chapter 3 describes the W&SR criteria and application to the river. Chapter 4 describes the W&SR classifications and applications to the river. Chapter 5 describes the suitability factors and application to the river. Chapter 6 describes various river alternative actions and Chapter 7 describes the interim management needed until congressional action. There is also a chapter listing the study group members and a discussion of those who have commented to date on the process.

This report is a record of the W&SR study process associated with the resource management plan (RMP) being prepared for the San Luis Resource Area. This report is not meant to be an environmental impact analysis but an examination of the river segments in relationship to the W&SR eligibility/classification/ suitability criteria. The environmental analysis is discussed in Chapter 4 of the proposed RMP/final EIS. If congressional sponsorship occurs, the Bureau would be requested to prepare a legislative environmental impact statement and study report for the Rio Grande River Corridor. This study and Chapter 4 in the proposed RMP/final EIS will be combined and rewritten as a legislative EIS/study report. This legislative EIS/study report will receive further review and possible modification by the Director of BLM, the Secretary of the Interior, and the President of the United States.

Background

As a part of the SLRMP process, a study team was formed in 1987 to complete an appropriate analysis of all potential wild and scenic rivers within the planning area. The team looked at some 32 segments of streams/rivers adjacent to land administered by the Bureau Land Management (BLM). Attachment 1 of this report lists those streams/rivers evaluated. Only two portions of one river were considered to be eligible. Two portions of the Rio Grande River beginning at the New Ditch Dam, approximately 1-1/2 miles downriver from the upper boundary of the USFWS Alamosa Refuge, downriver to the New Mexico State line (about 41 miles) appear to meet the W&SR criteria.

The remainder of this study report describes the assessment of 41 miles of the Rio Grande River located in the south-central portion of the San Luis Planning Area. The three required parts of the river assessment are included here: 1) determination of eligibility, 2) potential classification(s), and 3) determination of suitability. This report is also the public record of this river assessment and documents the potential of this segment of the Rio Grande River to be designated as part of the National Wild and Scenic River System (NW&SRS). The study was begun with the RMP public issue scoping in early 1986 and will conclude with the publication of this proposed resource management plan/final environmental impact statement (RMP/EIS) in the summer of 1991. The initial scoping, issue/management concern identification process, and the development of the management situation analysis (MSA) in the San Luis Resource Management Plan (SLRMP) indicated that this segment of the Rio Grande River has some of the qualities that potentially would warrant inclusion in the system. For more detailed information on the scoping and public involvement regarding this issue, please refer to Chapters 1 and 5 of the Draft San Luis Resource Management Plan/Draft Environmental Impact Statement (September 1989) and Chapters 1, and 2 in this proposed RMP/final EIS. The area has also been identified as a potential special recreation management area (SRMA), an area of critical environmental concern (ACEC), and an area with some special cultural and wildlife characteristics.

The original study report was included as an appendix to the DRMP/DEIS when published in September 1989. Many concerns regarding this potential designation surfaced during the public review and comment period for the original study report. Many commenters strongly believed that BLM had not analyzed the river corridor sufficiently or correctly. In the spring of 1990, the study team was reassembled to a) revisit the application of the eligibility criteria, b) reapply the classification categories, and c) reassess the suitability of the river to become a portion of the national system. This revised study report is a record of that group's

efforts and is considerably different from the original report.

Roles and Authorities

The BLM study group completed this report under the following authorizations/references:

The *Wild and Scenic Rivers Act* (PL 90-542, with amendments)

The 1970 USDA/USDI List

The Nationwide Rivers Inventory

The *Final Revised USDI-USDA Guidelines for Eligibility, Classification, and Management of River Areas of September 1982.*

BLM Manual 1623

Study Segments and Study Area Boundary

Boundaries of any river proposed for potential addition to the National Wild and Scenic River System (NW&SRS) are generally limited to that area measured within one-quarter mile of the ordinary high water mark on each side of the river. The study area encompasses approximately 13,230 acres. Of the total river length, approximately 22 percent is administered by BLM, 14 percent is administered by the U.S. Fish and Wildlife Service, and the remaining 64 percent is privately owned. The river-related resources were assessed within the total corridor; however, BLM has limited authority on privately owned land.

The study group identified three logical segments of the 41-mile portion of the river to be carried into the analysis process. These three segments are:

Segment A - Beginning just below the New Ditch Dam on the river and ending just adjacent to the Lasauses Cemetery (approximately 19 miles in length).

Segment B - Beginning just adjacent to the Lasauses Cemetery and ending at the mouth of the Lower Rio Grande Box (approximately 14 miles in length).

Segment C - Beginning at the entrance of the Lower Rio Grande Box and ending at the Colorado/ New Mexico State line (approximately 8 miles in length).

There were some minor changes in these segments from the original study report (see Maps A-1 and A-2 on following pages and the large-scale map in envelope in back of proposed RMP/final EIS).

Study Process

A complete and comprehensive analysis of the environmental effects is addressed in Chapter 4 of the previously published draft RMP/EIS and in Chapter 4 of the proposed RMP/final EIS, plus this report as an appendix. The reader needs to refer to these two chapters of both documents for a more detailed analysis of impacts.

The process began with study group work sessions in the winter/spring of 1988. Meetings and consultations with the Bureau of Land Management (BLM) Taos Resource Area Staff, who manage the 67 miles of the Rio Grande Wild and Scenic River Corridor in New Mexico. Other BLM, as well as National Park Service (NPS), personnel were also consulted to obtain information and insight for the assessment. Additional steps included: (1) various group tours of the area to include four different river float trips; (2) various group work sessions for interaction in the analysis process; (3) informal public workshop discussions with a special management user input group; (4) discussions with various local/state/Federal agencies; (5) a public review of the DRMP/DEIS, including the study report as an appendix; and (6) various briefings with water users and environmentally concerned groups.

The following listing shows some of the past and future key dates in this study process:

September 1987: Shared the management situation analysis (MSA), which included the potential wild and scenic river section, with 70 to 80 public members of the RMP user input groups.

October/November 1987: Collected examples of other assessments and information on legal requirements of assessment for RMP.

October 1987: Shared the initial ideas on the wild and scenic river issue with the Canon City District Advisory Board.

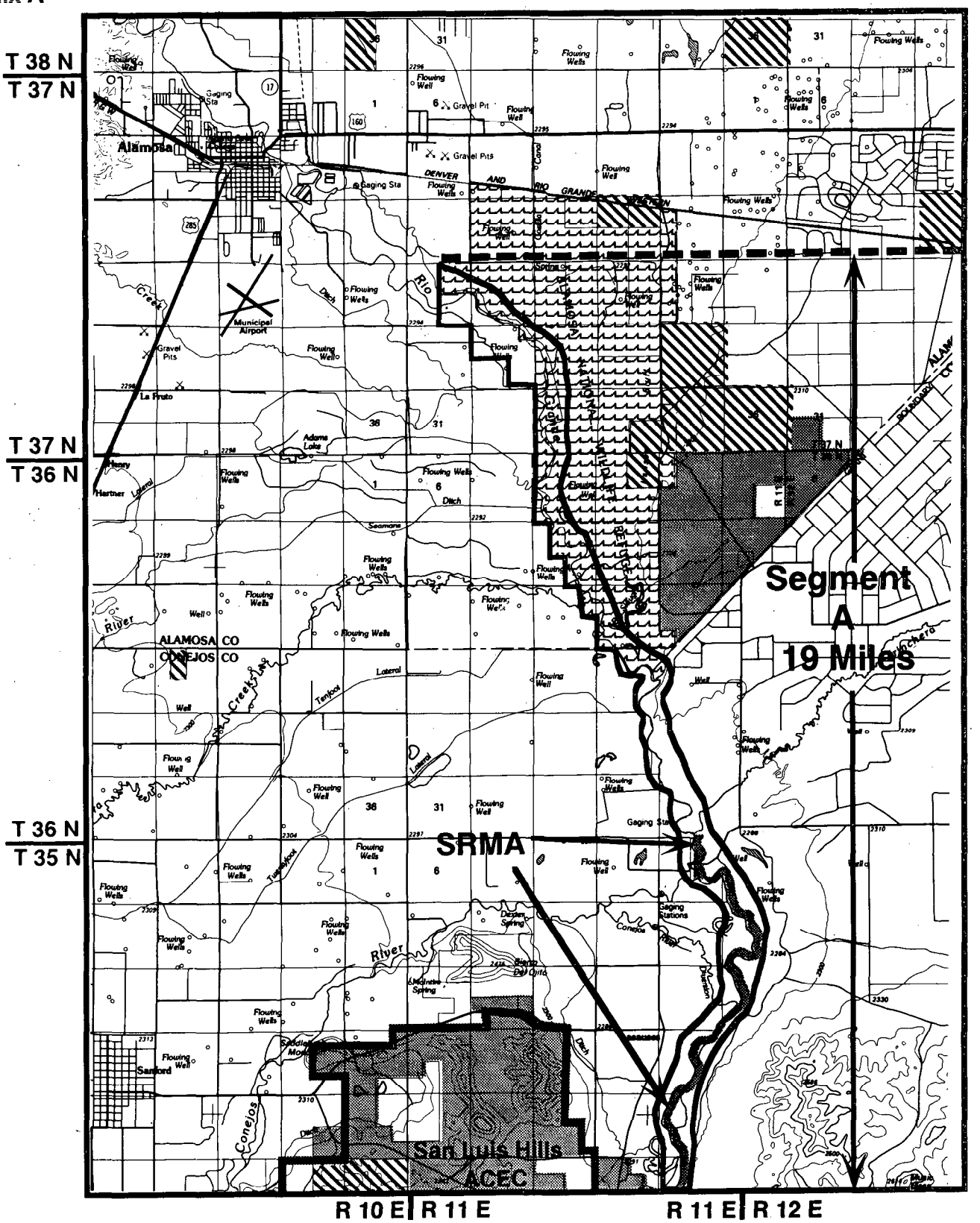
January 1988: Organized process of assessment, selected group, and made needed assignments.

February 1988: Completed corridor tour and river assessment, wrote draft, and distributed for review. (The initial SLRA tour of the river corridor and the group work session were February 23 through 25.)

March 1988: Reviewed draft, integrated into RMP alternatives, prepared study report appendix.

October 1988: Completed final preparation of wild and scenic river maps, acreage tables, etc.

September 1989: Wild and scenic river study report received public review in the published DRMP/DEIS document.



N

Rio Grande River Corridor Map
North Half

Miles 1 0 1 2 3

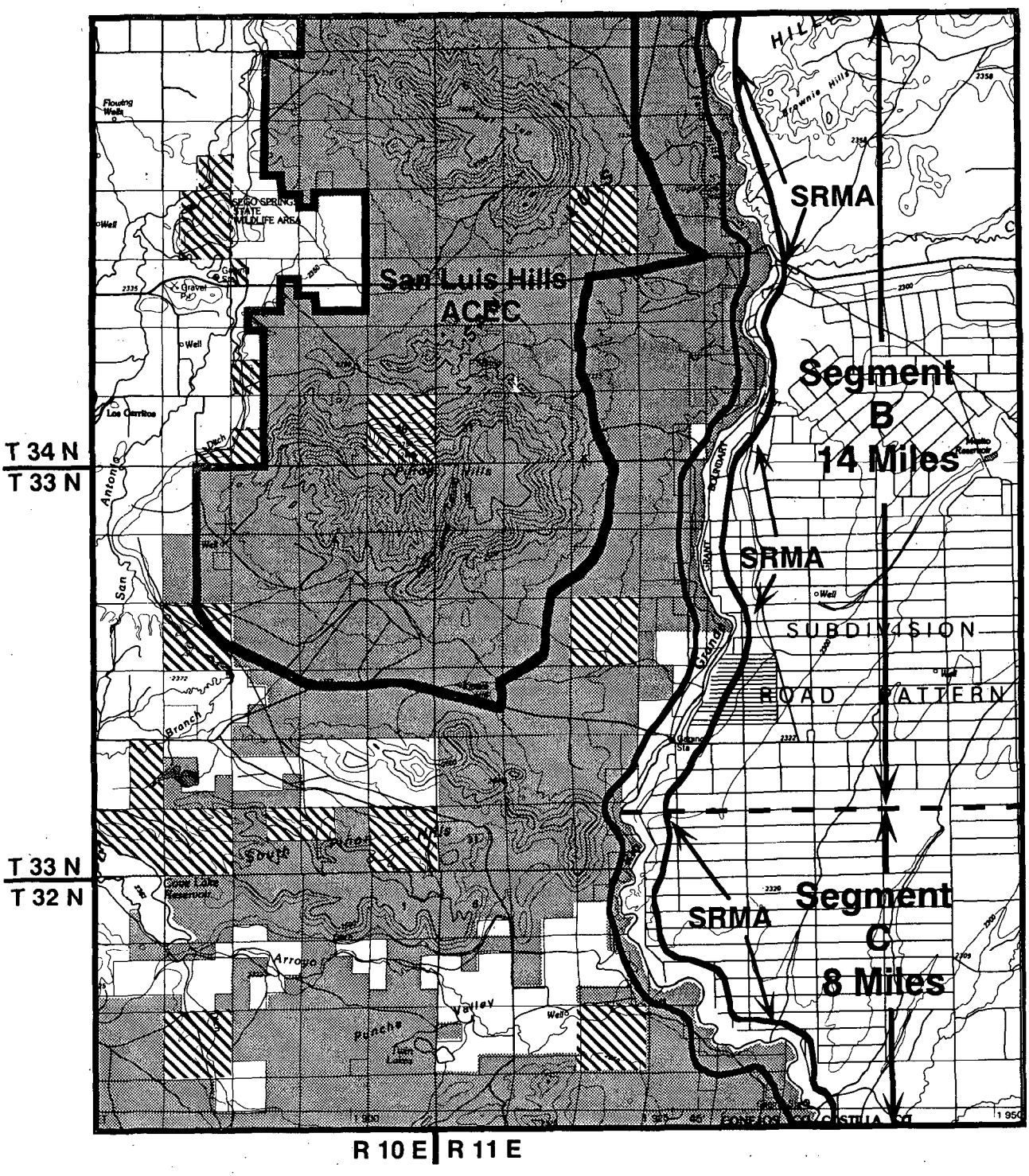
Bureau of Land Management

National Wildlife Refuge

State Land

Note: Segment A is a Wild and Scenic River Study Area and the lower portion is also a Special Recreation Management Area

Map A-1



Rio Grande River Corridor Map
South Half

N

Bureau of Land Management

State Lands
and Division of Wildlife

Miles 1 0 1 2 3

Appendix A

Note: Segments B&C are Areas of Critical Environmental Concern, Wild and Scenic River Study Areas and a Special Recreation Management Area

Map A-2

Spring/Summer 1990: Revised study report based on significant public comment to include a revisiting of the application of the eligibility/classification/suitability criteria. Various meetings/briefings with water rights interest groups, environmental interest groups, state and Federal agencies, congressional delegation staffs, and other interested parties. Study group reformed and enlarged to respond to public comments. Meetings with regional solicitor office people to clarify legal standing of water rights.

Fall/Winter 1990: Revise the proposed RMP/final EIS based on revised W&SR study report. Work closely with BLM management to make a decision on the W&SR issue within the RMP and assist them in developing rationale for their decision.

Summer 1991: Publish the revised study report within the proposed RMP/final EIS.

Based on the guidance outlined in *Guidelines for Fulfilling Requirements of the Wild and Scenic Rivers Act,* the assessment will continue as a regular part of the BLM planning process. This process will include the publication and public distribution of the proposed RMP/final EIS. This provides the opportunity for the public, who have been involved through the planning process, to protest to the BLM Director the wild and scenic river recommendation. After the protests, if any, are resolved by the Director, an approved resource management plan and a record of decision (ROD) will be published. A plan implementation process is begun immediately on approval of the plan for most decisions within the RMP. The plan decision to recommend or not to recommend the Rio Grande River to the U.S. Congress for designation and issuance of the ROD ends BLM involvement at this level. If congressional sponsorship occurs, a request to the Bureau would be made to prepare a legislative environmental impact statement and study report for the Rio Grande River Corridor. Regardless of decisions in the approved RMP, the W&SR Act calls for interim management to protect the "free-flowing status" and the "outstandingly remarkable values" until such time as Congress acts on the recommendation. This began in December 1990. Chapter 7, Interim Management and Attachment 7 (Federal Register Notice) has more discussion of this.

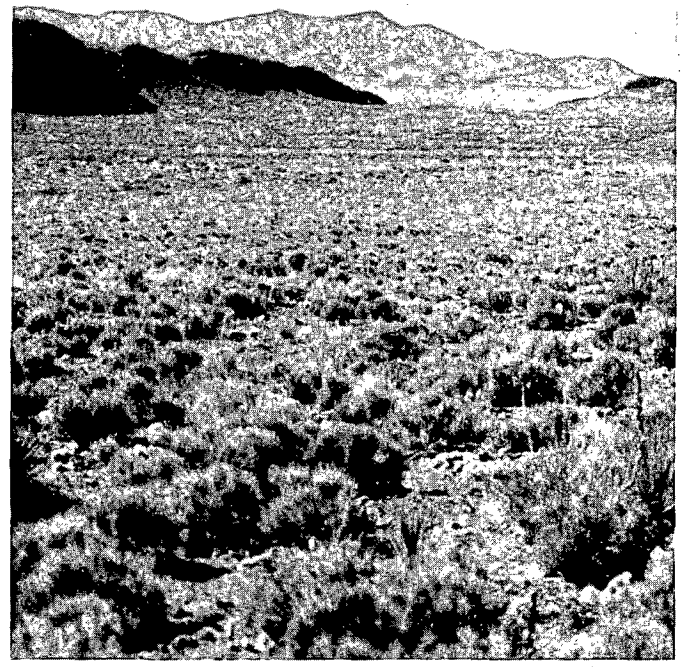
Relationship of the W&SR Act to Private Lands

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 compliance through acquisition of private lands or interests in lands.

The *Wild and Scenic Rivers Act* specifically prohibits Federal use of condemnation for fee title purchase of lands if 50 percent or more of the land within the boundary is already in public ownership. The present ownership is approximately 36 percent publicly owned and 64 percent privately owned. The Act does provide the Federal government with authority to purchase scenic, conservation, or access easements through condemnation proceedings, but this measure would be used only as a last resort if 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 values, 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.



2. AFFECTED ENVIRONMENT

General

This chapter describes the general physiographic environment of the river corridor and surrounding area, general ownership, and the various land uses/resources within the corridor. It also presents an overview of the socio-economic conditions in the area and a discussion of the various constraints.

General Setting

The setting for this study area is an expanse of land and water in the south-central portion of the San Luis Valley of Colorado and consists of a corridor approximately one-half mile wide and 41 miles long along the Rio Grande River. The corridor begins below the New Ditch Dam within the Alamosa National Wildlife Refuge and continues downriver to the Colorado/New Mexico State line.

The study area contains three distinctly different physiographic settings. The upper 19-mile portion is represented by large areas of wetlands and a heavily meandered stream bed with old oxbows and side channels present. The extensive riparian vegetation on these low streambanks consists of dense willow thickets and numerous clumps and groves of cottonwood. Large expanses of irrigated meadows also occur. The middle segment consists of about 14 miles of river with several sparsely vegetated hills rising above the general river elevation. The river alignment is much straighter in this segment. The lower 8-mile portion of the study corridor flows through a stark, sheer-walled gorge with a very narrow riparian zone between the edge of the water and the steep walls of the canyon.

The Rio Grande River is a free-flowing river throughout the entire study area. There are no major water impoundments anywhere in any of the three segments; however, there are several irrigation ditch returns. Remnants of an old washed-out rock dam are present in the upper box of Segment B. Water quality measured by the state shows sufficient water quality to permit body water contact and fishing and is classified as Recreational Class I and Aquatic Life Class I. Water level peaks during spring runoff with the highest level in May and June and lower flows during the remainder of the year. The stream gradient is less than one-half percent with no large rapids nor falls. The width ranges from 60 to 120 feet in June and from 20 to 75 feet in late summer.

The existing ownership pattern is approximately 36 percent public and 64 percent private.

The approximate total acreage within the 41-mile river corridor is 13,230 acres. Of this total amount, 8,550 acres or about 64 percent is in private ownership, 1,850 acres or about 14 percent is in USFWS ownership, and 2,830 acres or about 22 percent is administered by BLM. More details of this ownership and the river mileage are in Attachment 2 to this report.

The following legal descriptions include this area.

New Mexico Principal Meridian

T. 32 N., R. 11 E.
Secs. 3, 4, 9, 10, 13, 14, 15, 23, 24

T. 33 N., R. 11 E.
Secs. 2, 3, 10, 11, 14, 15, 22, 23, 27, 28, 33, 34

T. 34 N., R. 11 E.
Secs. 2, 3, 11, 13, 14, 23, 26, 27, 34, 35

T. 35 N., R. 11 E.
Secs. 1, 2, 12, 13, 14, 23, 24, 26, 34, 35

T. 36 N., R. 11 E.
Secs. 4, 5, 9, 15, 16, 22, 23, 26, 27, 34, 35

T. 37 N., R. 11 E.
Secs. 28, 29, 33

Land Uses/Resource Description

The study area currently receives moderate recreation use. Visitation is expected to increase based on several factors including regional population growth, increased leisure time, and a greater emphasis on tourism marketing in the San Luis Valley. Recreation use along the river corridor includes fishing, boating, camping, hunting, and OHV use. Use estimates are shown in Table A-1.

There are about five county roads, one highway, and several nonsurfaced, nonmaintained roadways that provide access to and through the river corridor and within the study area. Livestock use of the area involves seven allotments adjacent to and including Segments B and C. A total of 280 cows and 3,340 sheep are permitted on these allotments. Livestock grazing use conflicts with river boating use in Segment B. Six wire fences (two smooth and four barbed) are stretched across the Rio Grande River, which present a definite safety hazard to unsuspecting boaters and at least a "river access" problem.

The study area is significant in that it is largely remote and sparsely populated, with few large manmade intrusions to detract from a natural, serene outdoor experience. This also results in extensive use of the corridor by wildlife (e.g., raptor nesting, waterfowl flyway, etc.).

The river flows on a year around basis with runoff in the spring bringing the highest flows. The 10-year average flow in this stretch of the river is 654 cfs, with the high flow (1980-1989) in spring reaching into the 3,400 cfs level.

Table A-1

Use Estimates

Recreation Activity	Number of Visits[1/]
OHV Travel	50
Other Motorized Travel	900
Nonmotorized Travel	160
Camping	250
Hunting	150
Land Based	250
Fishing	4,000
Boating	1,300
Other Water Related	1,500

[1/]Figures are based on estimates of BLM personnel who manage the area.

During the winter, the river drops very low; the lowest flow on record during the last 20+ years is around 10 cfs recorded at Lobatos Bridge. A large share of the flow during the growing season consists of irrigation return flows and augmentation flows. There are 25 waterways providing some flows into the Rio Grande River in Segments A, B, and C. These waterways are:

Chicago Ditch return flows

Closed Basin Ditch augmentation flows

Alamosa Lateral Ditch return flows

Rock Creek flows

Empire Lateral Ditch return flows

Alamosa Farm Lateral Ditch return flows

La Jara Creek flows

Alamosa River flows

Hansen Ditch return flows

Tenfoot Ditch return flows

Twentyfoot Ditch return flows

Trinchera Creek flows

Conejos River flows

Conejos River Diversion Ditch return flows

Lasauses Ditch return flows

Culebra Creek return flows

Punche Arroyo flows

Eight other unnamed ditch return and creek flows

Segment A

The first 7.7 miles of Segment A are in the Alamosa National Wildlife Refuge operated by the U.S. Fish and Wildlife Service. This area supports a wide range of waterbirds and species dependent on the riparian habitat; e.g., beaver. The adjacent private land is composed mostly of flat, irrigated meadows with extensive willow and cottonwood trees along the streambanks. Hansen Bluff, which ranges from 20 to 40 feet in height and parallels the river through the refuge, is of significant cultural value since it was an important overlook for paleo inhabitants in the area. The bluff also has paleontological significance as it contains a very large number of special vertebrate and invertebrate fossils.

South of the refuge, the river flows through about 4 miles of very similar terrain and vegetation as the upper 7.7 miles until it reaches the County Bridge. Only seven small, scattered parcels of BLM land border the river in this section, and the remainder of lands are in private ownership. The recently erected County Bridge across the Rio Grande River north of Lasauses is on BLM land. A parking lot constructed along the eastern bank of the river adjacent to the bridge provides public access for rafting, canoeing, hunting, fishing, wildlife observation, and other recreational activities. The old road provides access to a piece of BLM land at the junction of the Conejos and Rio Grande Rivers. The last 7.3 miles of Segment A are also very similar to the first 11.7 miles above the bridge except the banks change from the winding river corridor with dense bank foliage to a more straight flowing river with sparse bank vegetation.

The river has several species of fish including carp, northern pike, and trout, and many species of waterfowl are evident along the river. Raptors, including bald and golden eagles, are also present, at least seasonally, because of the abundance of fish, waterfowl, and other prey. Scenic vistas from the river include the Brownie Hills (east of river), San Luis Hills WSA and proposed ACEC, which includes Flat Top Mountain. Mt. Blanca and the rugged Sangre de Cristo Mountains to the east and the San Juan Mountains to the west can be seen in the distance.

Segment B

Along the upper 4.4 miles of Segment B, a large unbroken tract of BLM land borders the western and eastern side of the river. The remainder of the river is bordered by private and county land. The public and private ownership along the western side of the river crosses to the eastern bank of

the river up to the land grant boundary. This boundary reaches to the high waterline or flood line on the eastern side of the river, in some cases extending 20 or 30 feet beyond the level of the river and in some cases 80 to 100 feet. In some cases, ownership of the western side of the river extends to the eastern side of the river as well. There is some county-owned land along the eastern side of this segment, which extends down to the eastern high waterline. All of the Rio Grande Rancho subdivisions along the Rio Grande River in Costilla County have a public 20-foot pedestrian way tied into the western edge of their lots on the eastern bank of the river. This provides public access for the majority of the eastern side of the river. Except for the riparian zone, which varies in width along the river and extends along both sides, the land is semidesert with sparse vegetation. One portion of this segment has sparsely vegetated hills rising 500 to 900 feet above the river. Vertical rock walls of up to 100 feet occur in several places along the river creating an enclosed landscape. This portion of Segment B provides good habitat for a variety of raptors, nest sites for nongame birds such as cliff and bank swallows, and range for pronghorns, coyotes, and foxes.

The remainder of the segment, the lower 9.6 miles, is more open and offers opportunities for expansive unobstructed views. The exception to this is the upper box area, which is about 1 mile below the state highway bridge. This long enclosed rock bluff area provides seclusion from outside views for about 1.3 miles. Throughout the rest of the segment, however, the views of the Sangre de Cristos to the east and the San Luis Hills to the west are of scenic significance. The high waterline grant boundary here may average 100 feet beyond the low water level in places. Greater public access in the publicly-owned sections in this area is wider and more extensive along the river edge.

Overall, Segment B (14 miles) contains a variety of scenic, unique settings and includes numerous opportunities for solitude. An extensive inventory of cultural sites is present adjacent to the river along the lower 7 to 8 miles of this river segment. The state bridge on State Highway 142 and several subdivision roads on private lands along the eastern side of the river are the only large manmade intrusions; however, they are not visible from the river. All species of fish and wildlife in Segment A are also present in Segment B. The area does contain some noxious weed species in the riparian zone.

This segment is approximately 14 miles total. It extends downriver to the mouth of the river gorge, about 1.6 miles below Lobatos Bridge. Both sides of this segment of the river are the least developed of any segment of the study area. A point of interest in the lower portion of this segment is the Lobatos Bridge, which, because of its historical style structure, has been nominated for the National Register of Historical Places as part of State of Colorado Department of Highways Thematic Bridge Nomination.

Segment C

Segment C is approximately 8 miles in length and extends to the Colorado/New Mexico State line. The eastern side of the river in Segment C is also partially owned by the county and includes sizable amounts of subdivision with the publicly-owned undeveloped pedestrian ways. Public access is provided for the majority of this river segment on both sides through these pedestrian ways and the BLM lands.

Vertical rock walls about 90 feet high at the beginning of the segment, which begins about 1-1/4 miles south of the Lobatos Bridge, rise to approximately 200 feet at the state line. A nonsurfaced road extends southward from Lobatos Bridge approximately 1.5 miles on the eastern side of the river. It does not, however, provide vehicular access into the river gorge. Access by hiking or boat is the only means of access into Segment C because of the sheer rock walls. The riparian zone becomes very narrow in places and is confined by the cliffs.

Vegetation, fish, and wildlife species are similar to those in Segment B; however, wildlife resources in this segment are extremely rich and very fragile. A minimum of 35 to 40 raptor nesting sites have been inventoried including 11 prairie falcon eyries and 4 golden eagle eyries, some of which indicate 200 years of historical use. Several nesting pairs of Canada geese also reside in this segment along with numerous other species of waterfowl. This segment is also the beginning of a narrow migration corridor used by a large number of waterfowl and passerine birds in both the spring and fall.

This portion of the river contains none of the expansive vistas of the first two segments, except for a specific area at the very northern point. Instead, the vertical rock walls create an enclosed setting and help convey an intense feeling of remoteness.

Two possible dam sites have been investigated in this segment; one just north of the state line, and another near the northern end of the gorge. Potentially a dam could be built anywhere in the 8-mile gorge.

Recreational values are exceptional on the stretch of smooth water that flows through the canyon. The river is excellent for floatboating with outstanding opportunities for viewing waterfowl, hawks, owls, eagles, and big game within the close confines of the canyon walls. Observations of raptor nesting sites indicate historical use and a high density of raptors. The remoteness of the area and the steep canyon walls offer an outstanding opportunity for solitude and a primitive recreation experience. Scenic vistas include a totally undisturbed view of the rock-strewn river bank and sheer canyon walls. In addition, the area shows much potential for cultural resources. Although formal cultural inventories have not been completed along this section of river, the area contains many significant cultural resource sites. Prehistoric rock art and structural sites exist along this portion of the river.

Constraints

There are various items with the potential to limit or restrain management of the Rio Grande River as an element of the National Wild and Scenic River System. These items include existing waterpower withdrawals, potential mineral development, mixed land ownership, and water rights. The proposal for the 345 kV powerline from Taos, New Mexico, to Center, Colorado, has been withdrawn by the Colorado Public Service Commission. If this right-of-way is needed at some future date, it will be placed along a route on the west side of the San Luis Hills. This issue, therefore, is no longer a potential conflict with the significant values along the wild and scenic river corridor.

Existing Waterpower Withdrawals

Waterpower/storage withdrawals with several overlapping public water reserves occur on BLM lands along the river. The power withdrawals and public water reserves would limit some types of development along the river because nothing can be done to affect the purpose of the withdrawal unless that withdrawal is recommended for termination in the RMP planning process. A decision in the proposed RMP to recommend inclusion of this river in the National Wild and Scenic System would mean that the existing waterpower/storage withdrawals would be recommended for termination.

Potential Mineral Development

Mineral development could conflict with the existing public water reserves or the recommendation for wild and scenic designation. The proposed RMP recommends a protective withdrawal to close the corridor to mineral location to provide added conservation measures for wildlife, scenic, and recreational values. This proposed RMP recommendation to withdraw the corridor from mineral location would be made, however, regardless of the wild and scenic river recommendation. A major portion of the same area is presently managed as a special recreation management area (SRMA) from the County Bridge downriver to the state line. This withdrawal is needed to provide conservation of the scenic viewing, watchable wildlife, and other significant recreational values in this stretch of the river.

Mixed Land Ownership

The various subdivisions, with mixed private and county ownership, to the east of the river could also cause potential problems for maintenance of the values important to a potential wild and scenic designation. Although approximately 50 percent of the shoreline of the river is in Federal ownership, the immediate scenic viewing area and some of the vital wildlife habitat is in or adjacent to these subdivisions, which potentially could cause a future problem. Many of the lots in these subdivisions within the river corridor have returned to the county because of tax forfeiture. On all the Rio Grande Rancho subdivisions, a 20-foot public access pedestrian easement exists along the eastern high waterline of the river. BLM-administered land along the western side of the river crosses to the eastern bank of the river estending up to the high waterline; therefore, BLM manages the largest share of the river itself. Of the hundreds of divided lots on the eastern side of the river and within the one-quarter mile corridor, only two have structures at present. Designation could, to some extent, result in increased structural occupation of these remote lots.

Water Rights

The Rio Grande River Interstate Compact became effective on March 18, 1938, and applies to this river segment. A major purpose of this interstate water agreement was to establish the quantity of water Colorado is to deliver into New Mexico. Section 13(e) of the *Wild and Scenic Rivers Act* addresses interstate compacts:

"Nothing contained in this Act shall be construed to alter, amend, repeal, interpret, modify, or be in conflict with any interstate compact made by any States which contain any portion of the national wild and scenic rivers system."

The future administration of this compact, therefore, would not be affected by the addition of the 41-mile stretch of this river to the National Wild and Scenic River System.

Several water user groups expressed concern that even though the river corridor may qualify under the criteria, there is an over allocation of water within the San Luis Valley for domestic, municipal, industrial, and agricultural purposes. The water users believe designation would cause them some unspecified problems regarding their operations. The major concerns of the users are focused on the reserved water right that would be created by the designation. Section 13(c) of the Act states that wild and scenic designation reserves water in the quantity necessary to accomplish the purpose of the Act, preservation of rivers in a free-flowing condition, and preservation of the outstandingly remarkable values for the benefit and enjoyment of future generations. Water users are uneasy because of the strategic location of the prospective Federal water right, even though this possible right would be junior to approximately 16,000 other senior adjudicated water rights. Their concern also is that if BLM obtained a reserved water right it would be based on the conditions in the stream at the time of national designation. Any changes in water rights upstream, which could alter these conditions in the river, could be protested by BLM, since BLM as a junior water right holder would have a right to expect conditions to remain the same as at the time of wild and scenic designation by Congress.

There are 16,000 + senior adjudicated water rights existing in the San Luis Valley presently, which are as follows:

San Luis/Saguache Creeks and tributaries	2,400
Rio Grande River and tributaries	8,250
Alamosa/La Jara Creeks and tributaries	1,050
Conejos River and tributaries	1,800
Costilla/Culebra Creeks and tributaries	450
Old Water District 27	1,250
Old Water District 35	1,200
Augmentation Plans	51
TOTAL	16,451

SOURCE: "Tabulated Water Rights in Water Division 3" dated December 31, 1989.

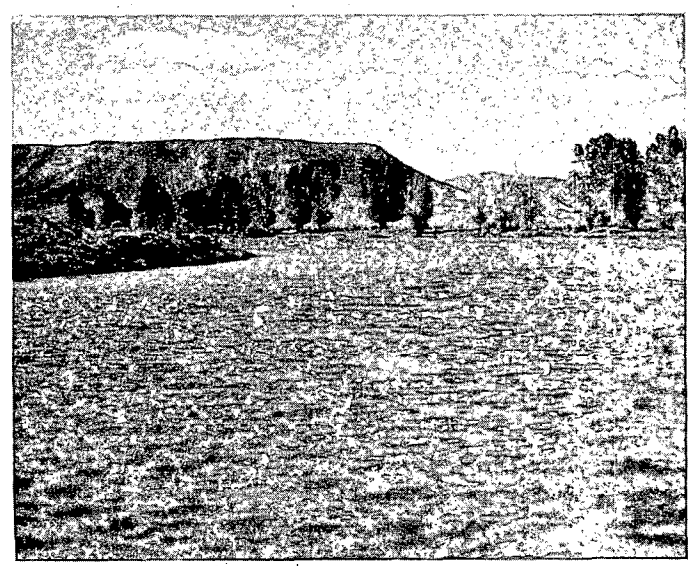
Since there are a very large number of senior rights already in place on the Rio Grande River, the placement of an additional very junior Federal water right should have a very negligible, if any, effect on existing upstream water operations, future changes, or modifications to diversions. Many of the 16,000 senior water right holders would have problems with: 1) major upstream diversion of water (i.e., selling water to cities outside the San Luis Valley) and 2) minor operational changes upstream (i.e., changing point of diversion or modifications of diversion structures) and would object to such changes. A junior reserved water right could be, at the worst case, a nuisance transactional factor for water users.

There appears to be widespread interest in continuing the agricultural lifestyle in the San Luis Valley. A sizable number of the water users and nonwater users in the valley have publicly expressed opposition to diverting water from the valley to out-of-basin users. This interest, expressed by many commenters, may well be better served by conserving this river environment through wild and scenic designation. The proposal to designate the Rio Grande River as wild and scenic may be of assistance in continuing the existing conditions on the river and preserving a portion of that river environment; i.e., maintaining some minimum flows in the river with agriculture return flows. This may, in fact, have a very strong psychological effect of keeping water in the valley for conservation and agriculture uses instead of diverting it to other areas for municipal use.

There is a concern that the Federal government, if this river is placed in the national wild and scenic system, would want a low-flow limitation or require a minimum flow without going through the Colorado State Water Law system. Any reserved right for this river would be adjudicated in the Colorado courts. The environmental groups, including reputable wildlife biologists, have stated that a minimum flow of from 40 to 60 cfs would be needed to perpetuate the biological riverine environment and related values. The BLM recommendation for designation in the proposed RMP would in no way change the valid existing water rights situation and would state that any inadvertent water flow present, specifically the "existing conditions," are sufficient for the perpetuation of the significant river values. This basically would mean continuing the existing situation on this 41-mile stretch of river; i.e., average 10-year (1980-1989) flows of 654 cfs, short duration low flows of 43 cfs, and short duration high flows around 3,400 cfs.

There were other concerns expressed that there would not be any flows within this particular 41-mile stretch of river because of changes in water operations upstream. In discussing these concerns with the water users, they have no specific examples of actual proposals for changes in operations at this time and could not offer any ideas for likely future proposals. BLM is directed, by regulation, to look, at reasonable, foreseeable impacts. It is apparent that with 25 return flows within this stretch, there would always be some minimum water flows in the river. The obligatory flows downriver to the New Ditch Diversion Dam provide for at least this level of flows to the very beginning point of this 41-mile stretch of river.

It is apparent that if the water users on any of the return flow waterways below the New Ditch Dam (e.g., La Jara Creek, Alamosa River, Tenfoot Ditch, Trinchera Creek, Conejos River, Alamosa Lateral Ditch, Empire Lateral Ditch, etc.) were to sell their water rights to a transmountain diversion company (e.g., cities outside the San Luis Valley, etc.) they would only be allowed by present state water law to sell an amount equal to that which they consumptively use. This use is normally between 50 and 60 percent, therefore, a substantial amount of water will continue to flow into the river and be available for conservation of the riverine environment in this lower stretch of the river.



3. DETERMINATION OF ELIGIBILITY

General

The *Wild and Scenic Rivers Act* states that to be considered for inclusion in the National Wild and Scenic Rivers System (NW&SRS), a river or river segment must be free flowing and, with its immediate environment, must have one or more outstandingly remarkable values.

This chapter discusses the definitions of free flowing and whether or not segments qualify under the definition. Also included is the study team assessment of the outstandingly remarkable features in each segment.

Free-Flowing Criteria

The final BLM guidance, dated September 8, 1988, on identification and evaluation of potential additions to the NW&SRS was used in the study of this river. To be eligible for inclusion, a river must be free flowing; i.e., existing or flowing in a natural condition without impoundment, diversion, straightening, riprapping, or other modification of the waterways. See Attachment 3 for more information on the eligibility criteria.

Free flowing should not be confused with naturally flowing, which is flowing without any upstream manipulation except by nature. The BLM study team acknowledges that several large irrigation diversion ditches above the 41-mile study segment substantially reduce the volume of water flowing naturally through the corridor. After consideration and reconsideration of the river attributes, however, the study group believes the stream flow returned by seepage in the wildlife refuge, the Conejos River, and through return ditches is adequate to maintain the resource values present at this time.

Several 200-foot long sections of stream-eroded banks (6 to 8 feet high) have been riprapped in the refuge. Natural appearing river rock was used, and the stabilization improvements are fairly inconspicuous and have very marginal influence on the free-flowing nature of the river. The remnants of the washed-out rock dam do not constrict the flow of the river.

The entire 41-mile segment is considered to be free flowing. The section studied remains in a natural riverine appearance and is free of any dams and extensive riprapping.

Outstandingly Remarkable Values Criteria

The second eligibility criteria that must be met before a river can be included in the wild and scenic river system is that it must have one or more outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar value The term "outstandingly remarkable" is not precisely defined in the *Wild and Scenic Rivers Act*. Consequently, the determination of whether or not a river area contains these values is based on the professional judgment of the interdisciplinary study team. These values, which must be directly river-related, are considered outstandingly remarkable if they are unique or exemplary compared to similar values in other river areas.

Scenic Resources

The scenic resources present along the study segment are unique when compared to other rivers in Colorado, as well as other segments in the wild and scenic river system. The diversity and stark contrast in vegetation and landforms, both within and between river segments, give the study area its unique qualities. From the Alamosa Wildlife Refuge to the Lasauses Cemetery, the river meanders through a green pastoral setting bordered in the foreground by marshes, willows, cottonwoods, and irrigated meadows. The low banks (3 to 5 feet) in this segment allow for uninterrupted views of the snowcapped peaks bordering the broad San Luis Valley. Seven peaks over 14,000 feet are visible in the background along the rugged Sangre de Cristo range. Several modifications are visible along the route including three bridges, several sections of stone riprap, several fences, and a rock watergap fence; however, these are considered to be minor impacts on the visual qualities.

Below the Lasauses Cemetery, the river cuts through the volcanic rock of the San Luis Hills. The barren-looking hills rising several hundred feet above the river in the foreground, and up to 2,000 feet in the background, provide a dramatic change in character from the pastoral upstream segment. The narrow strip of green along the river is bordered by low black/brown cliffs and sagebrush-covered rolling hills. The remnants of an old washed-out rock dam is present; however, is also considered to be a minor impact on the visual qualities.

About 1.6 miles below the Lobatos Bridge, the river again changes character as it enters a box canyon, increasing from 90 to 200 feet in height as it approaches the New Mexico border. Here the enclosed setting is dominated by the black volcanic cliffs, offering none of the distant vistas of the upper river.

In summary, when looking at the study segment as a whole, the variety and uniqueness of the scenic resources are of regional and potentially national significance when compared to other rivers.

Recreation Resources

Recreational boating opportunities along the study segment are limited because of a short season, low-flow levels, and a low gradient along the entire stretch (no whitewater). The low gradient does allow for flatwater canoeing opportunities, which are somewhat limited on rivers in the mountainous regions of Colorado. The fishery is moderately productive, and some angling use for pike, trout, and nongame fish does occur on the river. The lengths of boating runs and availability of public land access points along the corridor enhance opportunities for recreation use.

The outstandingly remarkable recreation values along the corridor are based on the diverse scenery and opportunities for solitude and wildlife viewing. From distant views of 14,000-foot peaks to stark, arid rolling mountains to a narrow steep-walled canyon, the river passes through very diverse and scenic landscapes. The vast vistas in the upper segment and the enclosed landscape of the lower segment contain few manmade developments and offer outstanding opportunities for solitude. Waterfowl, beaver, and upland game are among the wildlife seen on the river in the upper segment, while the lower segment contains one of the highest concentrations of birds-of-prey in the nation. The canyon setting offers many opportunities to view these birds.

Geologic Resources

The variety of landforms in this study corridor are also unique. Hansen Bluff, a relic shoreline (formed by ancient river, sea, or lake), rises 30 to 40 feet above the valley floor and extends along the river bottom through the refuge area. The bluff has paleontological significance because of the large numbers of vertebrate and invertebrate fossils. This type of feature is considered to be rare.

Fish and Wildlife

The wildlife resources associated with Segments A and B are significant because of the variety of habitats and many varied species. Several species of waterfowl and shorebirds utilize these river segments, at least seasonally, for nesting and feeding (e.g., mallards, widgeons, teal, canvasback, western grebe, white-faced ibis, spotted sandpiper, killdeer, American avocet, etc.). Beaver, mule deer, pronghorn, grey fox, coyotes, and several rodent and bat species represent some of the common mammals.

Segment C has an associated outstandingly remarkable wildlife resource. Significant numbers and variety of nesting raptors (i.e., prairie falcons and golden eagles) are in the segment. Riparian/riverine dependent birds, mammals, reptiles, and amphibians are also in this area as well as several species of migrants.

Historic Resources

The Lobatos Bridge, because of its historical style structure, has been nominated to the National Register of Historic Places as part of the state of Colorado Department of Highways Thematic Bridge Nominations.

Cultural Resources

The San Luis Valley is nationally known for the density and diversity of both archaeological and historical sites. One area of intense concentration of these resources is the Rio Grande rift, which has comprised a corridor of subsistence and commerce for at least 10,000 years. The 60+ formally recorded sites in this study area reflect only the small acreage that has been inventoried, but indicate the potential resource yet to be surveyed. The kinds of archaeological sites encountered constitute a representation of regional prehistory from paleo Indian to nomadic bands of Ute and Apache and are evidenced in standing structures, tipi rings, quarries, and rock art.

Historically, this location has been important from Spanish colonial times through the recent American historic period. Physical manifestation of history include the famous explorer DeAnza's camp and river crossing, early livestock camps, early mining efforts, and commercial transportation history reflected by Meyer's Ferry and the National Register eligible Lobatos Bridge.

Eligibility Determination Summary

The entire 41-mile river segment has been determined to be eligible for inclusion in the National Wild and Scenic River System.

This portion of the river studied is free flowing. There are no dams, reservoirs, diversion structures, nor riprapping of any consequence along the river from the New Ditch Dam in the Alamosa Refuge to the Colorado/New Mexico line. There are several bridges with some minor amounts of rock riprap, and there is some remaining evidence in Segment B of an old washed out private dam. These appear to be very minor disturbances and do not seem to restrain nor in any substantial way restrict flows within this river study area.

Several outstandingly remarkable values are present in this study area. The unique scenic values consist of a variety of vegetation types overlying at least three distinctively different landforms to create interesting patterns and contrasts of soil, rock, vegetation, and elevational relief. The distant views of the Sangre de Cristo range also greatly enhance the visual quality.

Many combined values produce outstanding recreational opportunities. Excellent opportunities for canoeing and flatwater boating are available here in a region where whitewater recreation is most prevalent. These flatwater boating experiences are greatly enhanced because of the

abundant numbers of raptors, owls, waterfowl, small mammals, and big game in this area. The scenic beauty, which can be most appreciated from the river, and the remoteness and general lack of manmade intrusions contribute to an outstanding opportunity for solitude.

This river segment is an especially productive riverine habitat for waterfowl and various raptors. Observations of raptor nesting sites indicate over 200 years of historical use and a high density of raptors. This habitat quality is exceptional, particularly in Segment C and a portion of Segment B.

These features (scenery, recreation, wildlife, and cultural) have been determined to be at least significant on a regional scale, and are believed to be exemplary when compared on a national scale.

4. CLASSIFICATION

General

The river is divided into segments for classification. Segments are determined by obvious changes in land status or ownership, changes in river character, changes in amount of development, or presence of important resource values. See Attachment 4 for more information on classification within the national system.

After determining the eligibility of a river for inclusion in the National Wild and Scenic River System, it 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 extent of development of the river and its adjacent lands as they exist *at the time of the study*.

Classifying a study river as wild, scenic, or recreational does not segregate nor withdraw the subject lands, but rather recommends a level of interim management for Federal lands in the study area until a decision of designation is made by Congress. If Congress designates a river or river segment, it will 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.

The three classification categories for eligible rivers are defined as:

Wild river areas: Those rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and waters unpolluted. These represent vestiges of primitive America.

Scenic river areas: Those rivers or sections of rivers that are free of impoundments, with shorelines or watersheds still largely primitive, and shorelines largely undeveloped, but accessible in places by roads.

Recreational river areas: Those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past.

A wild river would be a very undeveloped river with limited access. A scenic classification would be applied to a river or river segment that is more developed than a wild river and less developed than a recreational river. A recreational classification would be appropriate in developed areas, such as a river running parallel to roads or railroads with adjacent lands that have agricultural, forestry, commercial, or other developments, provided that the waterway remains generally natural and riverine in appearance.

Water quality, water resources development, shoreline development, and accessibility are the criteria that are considered when determining classification. Each criterion is important, but their collective intent is more important. Although each classification permits existing development, the criteria do not imply that additional inconsistent development is permitted in the future. Developments compatible with designation would be allowed, provided they are constructed in an environmentally sound manner.

Wild River Category

Segments A and B do not meet all of the criteria for a potential wild classification, particularly in terms of accessibility. Five county roads, one highway, and several nonsurfaced roads provide access to and along the river corridor in these two segments.

Segment C does meet all of the criteria for potential wild classification. Water quality meets state standards to be classified as Recreation Class I (swimmable) and Aquatic Life Class I (fishable). It is free of any impoundments, and the shoreline is essentially primitive. A very small and limited amount of livestock grazing occurs here. The only visible detractions from a totally primitive condition are the infrequent, inconspicuous cow paths and light to moderate grazing use of the riparian vegetation. This segment is generally only accessible by foot or boat; however, a nonsurfaced road parallels the upper reach of the gorge for 1-1/2 miles. The road is within the one-quarter-mile corridor on the eastern side of the river, but is not visible from within the gorge.

Scenic River Category

Both Segments A and B meet all of the criteria for potential scenic classification. The water quality is fishable and swimmable. The segments are free of impoundments, and the shoreline is largely primitive and undeveloped. The only presence of manmade developments within the corridor are frequent fences (six of which are stretched across the river in Segment B), an abutment from a previous dam, and 12 to 15 small Alamosa Wildlife Refuge signs. There is also evidence of light to moderate livestock use. Livestock use of riparian vegetation, however, is considerably more evident in Segment B.

Three or four sets of farm buildings are visible along these two segments of river as is the small community of Lasauses. All of these rather dispersed structures appear to be outside the one-quarter-mile study corridor. Access to the river is common in the area, but the roads are seldom seen from the river. The only exceptions are the four bridges at the main road crossings. Basically these two segments appear largely

primitive and undeveloped, with very little evidence of human activity.

Recreation River Category

All three river study segments exceed the criteria for potential recreational classification.

Classification Summary

The consensus of the study group is as follows:

Segment A (approximately 19 miles in length) meets all the criteria for potential scenic classification;

Segment B (approximately 14 miles in length) meets all the criteria for potential scenic classification; and

Segment C (approximately 8 miles in length) meets all criteria for potential wild classification.

5. DETERMINATION OF SUITABILITY

General

This chapter of the study report contains a discussion of the eight suitability factors in relationship to the 41-mile study stretch, and to some degree, discusses the three segments of the river. These factors must be analyzed within this study report to completely meet the BLM *Guidelines for Fulfilling Requirements of the Wild and Scenic Rivers Act.*

Suitability Factors

The determination of suitability provides the basis to recommend designation or nondesignation of the river. If a river segment flowing through public lands would be a viable addition to the national system without the remainder of the river, the segment should be carried through the RMP process. See Attachment 5 for more details from the guidelines on suitability. At the point in time that a river stretch is determined to be eligible, a public land order is to be initiated providing interim protection for a specified period of years (see Attachment 7). As stated previously, the Rio Grande River below the Colorado State line already is designated a wild and scenic river. An extension of this designation to the New Ditch Dam within the Alamosa Refuge would improve management continuity as both segments have significant scenic, recreational, and ecological qualities.

A synopsis of the eight suitability factors and the study group's evaluation and analysis of suitability for potential designation as a wild and scenic river follow:

1. Characteristics that *do* or *do not* make the area a *worthy* addition to the National Wild and Scenic Rivers System.

Each of the three segments appeared to be suitable based on the group discussion under the eligibility criteria. Water quality might have been a potential detraction; however, it does presently meet the state water quality standards for classification as Recreation Class I and Aquatic Life Class I.

2. Current *status* of landownership, *use* in the area, including the amount of *private land* involved and *associated* or *conflicting* uses.

Segment A has 8 miles in the Alamosa Wildlife Refuge (U.S. Fish and Wildlife Service) and about 11 miles of mixed private and BLM ownership. Seven small scattered parcels are administered by BLM in this 11-mile stretch of river. Combining the USFWS land ownership and the relatively small amount of BLM-administered land in this segment, about 33 percent is in public ownership. All of the five access points now available to the public are in public ownership. The group concluded that this segment was probably manageable under the Act, provided the conclusion is based on the understanding that the USFWS will support the recommendation.

Since a large portion of land in Segment B and C is administered by BLM (about 41 percent), the study group concluded that these segments are suitable. One conflicting use could potentially be infringement on water rights in all segments if designation came from the U.S. Congress with a reserved water right. This is addressed more fully within the "constraints section" of this report. The group concluded that the discussions with the regional solicitor presented in the Constraints section showed there was no reasonable nor foreseeable impact; therefore, this factor would not be appropriate rationale for unsuitability.

As opportunities surface, fee title acquisition may be used. BLM proposes to acquire approximately 6,000 acres within the river corridor through scenic easements, fee purchase, and exchanges. This proposal is planned whether or not the river is designated as wild and scenic. There is a need to work with willing landowners to obtain scenic easements within this river corridor to protect the values that make the river eligible. The Act does not allow condemnation of additional lands if 50 percent or more of the corridor is currently in public ownership.

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.

There are no reasonable uses that would be foreclosed. There are various items that potentially could limit or restrain management of the Rio Grande River as an element of the National Wild and Scenic River System. These items include existing waterpower withdrawal, potential mineral development, mixed land ownership, and water rights.

Various values could be potentially diminished or foreclosed if designation does not occur. If the waterpower/storage withdrawals were not terminated, then special river values within this corridor could be diminished. If mineral development were not controlled, potential impact to the outstandingly remarkable values would occur. If the designation did not take place, it is reasonable that the present livestock trespass/riparian degradation management problems would continue. There is more discussion on some of these items in the Constraints section of this report.

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.

Local communities appear to not be interested. (Three of 27 communities and 1 of 5 counties commented against the W&SR proposal. No special recreation, domestic water, road, school or sewer districts responded. Four of seven major irrigation water user groups responded against the W&SR proposal.)

State agencies appear to not be interested. (The Department of Parks and Outdoor Recreation (DPOR) was supportive verbally, but did not respond in writing nor offer assistance in administration of this corridor. Colorado Natural Areas Program and Colorado Division of Wildlife responded positively, but stopped short of endorsing the W&SR proposal or offering assistance in the administration of the corridor. The State Water Engineer and Water Conservation Board were very much against this W&SR proposal and very much in support of the valley water users. One state legislator opposed the W&SR proposal.)

Federal agencies appear to not be interested. (The regional office of the National Park Service endorsed our W&SR recommendation. One of three USFWS letters mentioned it would be good; however, one letter addressed the ACECs and did not address wild and scenic designation and the other opposed designation. Rationale for opposition was concern regarding lack of water and increased public use disturbance of wildlife within the river corridor through the refuge.)

More recent discussions with the USFWS at the Alamosa National Wildlife Refuge have raised some additional issues and concerns (see Attachment 6 of this study report). The manager for the USFWS Alamosa Wildlife Refuge has expressed two concerns about recommending the portion of Segment A (approximately 7.7 of the 19 miles) within the refuge as suitable:

a. He believes the potential exists to almost dry up the river during seasonal water diversions onto the refuge, which could detract from the capability to manage the river environment as an element of the national system. According to the manager, no return flows occur or exist until at least 5 miles downstream.

b. The existing public use along the 3-mile network of trails and interpretative areas adjacent to the river (where presently walking, hiking, bicycling, and other public day use occurs, mainly for wildlife observing) within the refuge would be somehow modified by the BLM suitability recommendation.

The refuge manager also stated that the USFWS agrees that the river is highly deserving for national wild and scenic river designation from the refuge area boundary downriver.

The study group does not believe the above concerns are significant enough to change the suitability determination of the river for potential wild and scenic designation. There are numerous other return flow ditches and streams within the refuge providing return flows during seasonal water diversion; e.g., the Closed Basin Augmentation Flow Ditch (one-third mile below the New Ditch Dam), the Alamosa Lateral Ditch, Rock Creek, etc. (see Land Uses/Resource Description Section of this report for more information on these return flows within the refuge). In addition, during the float trip through the refuge in June 1990, the study group observed substantial quantities of water seeping back into the river in many locations. The recommendation and even congressional designation of this stretch of river as part of the national system should not change the existing public use on the refuge. The USFWS would have total control over use regardless of the status of the river.

The conclusion of the study group regarding the suitability of Segment A, including that portion within the refuge, is that it is suitable for recommendation and potential inclusion and management within the national river system. The study group believes the concerns voiced by the USFWS (incompatibility with agency goals at the refuge and potential impacts from water diversions within the refuge) do not provide sufficient rationale (based on the suitability criteria in the W&SR Act) for this study group to determine that the river segment flowing through the refuge is not suitable.

5. *Estimated cost* of *acquiring* necessary lands and interests in lands and of *administering* the area if it is added to the system.

The group discussed the potential of acquiring some protective interest in some lands adjacent to the river corridor. There is not a specific amount of land acquisition planned as part of the W&SR proposal. We do plan to acquire some easements where we need to develop some additional public access and also where we need to protect natural resource values. For the most part the access enhancement would occur regardless of the W&SR designation.

There may be about 6,000 acres of scenic easements proposed for purchase through Federal Land and Water Conservation Fund (about 75 percent of real land value at $40 per acre; i.e., about $180,000 expenditure over the 20-year plan; or about $9,000 per year to obtain this needed scenic easement protection).

There will be some administrative costs to BLM as a result of a potential W&SR designation. Assuming personnel, site development, maintenance, and the above-mentioned costs of purchasing scenic easements, the overall costs for administration could possibly be about $103,000 per year. A major portion, possibly 70 percent, of this expense would be needed, with or without W&SR designation; therefore, this did not constitute sufficient rationale for making any of the segments unsuitable.

6. *Ability* of the agency *to manage* the river area or segment as a W&S river.

A cooperative management plan would be needed among private landowners, the USFWS, and the BLM to appropriately manage Segment A. Segment A could be realistically cooperatively managed and is suitable. Segments B and C could be managed, and are suitable. BLM is the most appropriate public land agency to manage Segments B and C of this river. Between the BLM and the USFWS the public would have a large share of land ownership (about 36 percent) along the entire river corridor and would control approximately 50 percent of the very immediate river shoreline.

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.

The potential infringement on users' water rights upriver to curtail their capability to sell their water rights out of the basin or modify their system of operation is not a reasonable nor foreseeable action according to discussions with the Federal regional solicitor. Furthermore, it does not constitute a "taking" of the water rights. There is a more detailed discussion of this within the Constraints section of this report. Infringement of other potential land uses in the corridor; i.e., grazing privileges, mining claims, and rights-of-way, may occur to some degree. Wild and scenic characteristics now present in the river corridor would be protected from alteration resulting from future land uses and development.

8. Other issues and concerns identified in the land-use planning process.

There is a concern that if BLM proceeds with this W&SR recommendation, state water court filings relating to other BLM water interest might be negatively affected. There is also a concern of the USFWS that if BLM proceeds with this W&SR recommendation some of the water rights owned by the USFWS in the Alamosa NWR would be in potential danger of being ruled by the state as not correctly filed.

Suitability Determination Summary

During this study it has been determined that the river segments between the New Ditch Dam and the Colorado/New Mexico line are eligible for inclusion in the National Wild and Scenic Rivers System. 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 Rio Grande Corridor were used to determine suitability of the river for inclusion in the national system, under guidance provided by the *Wild and Scenic Rivers Act.*

Land ownership and management would generally be unaffected by designation. Existing land uses and activities on public and private lands would remain at existing levels after designation. New land uses, activities, and developments could be affected by designation if they would cause adverse effects to either the river or its outstandingly remarkable values. New hydroelectric facilities would be restricted, and long-term protection of the outstandingly remarkable values of the Rio Grande River would be ensured by inclusion in the NW&SR System through provisions in the *Wild and Scenic Rivers Act.*

If the river were designated, visitor use could increase, causing conflicts with some resource values. These potential conflicts would be addressed and mitigated through a coordinated resource management activity plan (CRMAP). Valid existing water rights would be unaffected by designation, as specified in the Act. Future water rights would still be governed by existing laws, including state law, the Rio Grande Compact, and the Closed Basin Project. Water quality would be maintained or improved.

The significant amount of Federal ownership in the corridor, and the presence of several outstandingly remarkable values that equal or surpass similar resource values in other designated rivers (scenic, recreation, wildlife, and cultural values) enhance the suitability of the Rio Grande River as an addition to the NW&SR System. The outstandingly remarkable values would be afforded the greatest degree of protection as provided under the *Wild and Scenic Rivers Act.*

The reasonably foreseeable potential effects on the management and protection of the land and resource values would be minimal and of minor intensity. The greatest positive effect would be the long-term protection of outstandingly remarkable resources present within the river corridor. The greatest negative effect would be the restrictions on new land uses and developments and activities, especially those that would negatively impact the outstandingly remarkable resource values in this corridor.

It is concluded, therefore, that, in its existing condition, the Rio Grande River is suitable for designation and would make a worthy addition to the National Wild and Scenic Rivers System.

6. ALTERNATIVE ACTIONS FOR THE RIVER CORRIDOR

General

The revised segment lengths (Segment A, approximately 19 miles; Segment B, approximately 14 miles, and Segment C, approximately 8 miles) will be used in the description of the alternative actions evaluated in this study report. Except for the revised segment lengths, the four alternatives remain the same as those in the original study report and analyzed in the San Luis Draft RMP/EIS. The study group believes these four alternative actions are still appropriate and have been fully assessed in the DRMP/DEIS. The actions, however, described within these original alternatives, especially the Preferred Alternative, have been reassessed and placed into a new proposal described in this report. Most of this reassessment has occurred as a result of public input and newly developed or additional information concerning the wild and scenic river proposal.

Original River Corridor Alternatives

Please refer to Chapters 3 and 4 of the DRMP/DEIS for the complete analysis of the four alternatives relating to the wild and scenic river. The following is a summary of these original draft alternatives:

Existing Management Alternative: At the present time, a minimal level of management of the river segment from Lobatos Bridge to the Colorado/New Mexico State is administered by the Taos Resource Area. Management consists of maintaining a sign-in board at the launch site (Lobatos Bridge), counting cars, and spot checking visitor use. An informal management agreement between the Taos and San Luis Resource Areas has been in place for several years. A proposal to include Segment C in a National Conservation Area (NCA) has been drafted by the Taos Resource Area.

Present use of public lands along the river for floatboating, grazing, hunting, fishing, and other recreational use would continue. There is a recognized need to acquire some easements or land on the eastern side of the river even beyond the high waterline to protect and improve riparian values and grazing management opportunities. The San Luis Resource Area would continue efforts to acquire lands along Segment B (two active exchanges). This acquisition, which includes approximately 75 acres of river frontage north of the Lobatos Bridge, is desirable to improve and expand river access above the high waterline.

Under this alternative, Segments B and C of the Rio Grande River Corridor area would continue to be managed for recreation as a special recreation management area (SRMA). There would be no major new developments for recreation, and existing facilities and sites would be maintained.

Natural Resource Enhancement Alternative: Segment C (8 miles) beginning at the mouth of the lower Rio Grande Box and ending at the Colorado/New Mexico State line would be recommended for classification as *wild* to be consistent with the river designation in New Mexico. Termination of all water powersite and water storage withdrawals on Segment C would be recommended. Proposed management for a portion of Segment A and all of Segment B would be as a special recreation management area (SRMA) with emphasis on protecting wildlife values.

This portion extends from the northern edge of the proposed wild and scenic river (W&SR) segment northward along both sides of the river for 22 miles to the County Bridge. Acquisition of scenic or protective easements to protect wildlife, riparian, vegetation, and recreation values would be a management objective on this segment of the river.

Production Resource Enhancement Alternative: In this alternative, the Rio Grande River would be managed as an SRMA from the state line north for 22 miles to the northern extent of public land (Segments C and B) near the Lasauses Cemetery. No wild and scenic river recommendation for inclusion of Segments A, B, and C would occur in this alternative. Management emphasis would be on intensive use for recreational activities such as floatboating, canoeing, fishing, hunting, and sightseeing. Emphasis would be on increasing the benefits of the additional tourism that might occur in the area.

Preferred Alternative: Segment C (8 miles) of the Rio Grande River would be recommended to Congress for designation as an addition to the National Wild and Scenic River System. Six miles would be recommended for wild designation and 2 miles for recreation designation. The SRMA recommendation is the same as in the the Natural Resource Enhancement Alternative.

River Corridor Proposed Plan Recommendations

This new proposal is the result of the reassessment of the information on wild and scenic rivers in relation to the Rio Grande River Corridor. This proposal would potentially have elements or portions of elements that made up the original alternatives analyzed within the DRMP/DEIS.

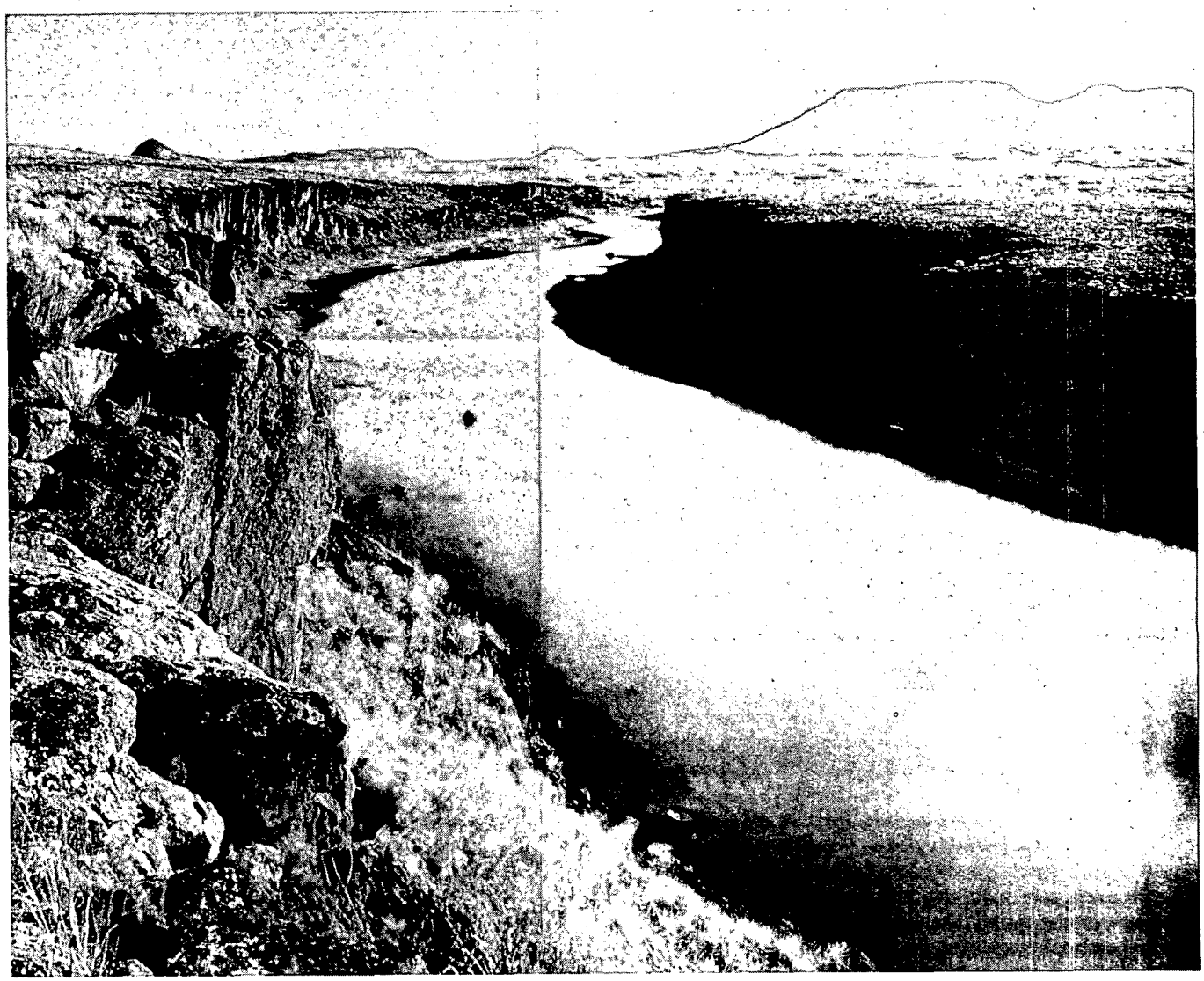
Segment A (beginning at the New Ditch Dam) and continuing through Segment B (ending 1.6 miles south of Lobatos Bridge at the mouth of the gorge) would be recommended for potential *scenic* classification as part of the National Wild and Scenic River System. All of Segment C from the New Mexico State line north to the mouth of the Rio Grande River gorge (approximately 8 miles) would be recommended for potential *wild* classification as part of the

National Wild and Scenic Rivers System. Termination of all water powersite and water storage would be recommended as well as initiation of protective interim management for those remarkable values present within the river corridor (see Attachment 7).

A portion of Segment A (from the County Bridge to Lasauses Cemetery) and all of Segment B should be managed more extensively for recreation than Segment C and would need to be managed as a special recreation management area (SRMA). All of Segments B and C should be designated as an area of critical environmental concern (ACEC).

Summary of Recommended Actions

The present cooperative management on the Rio Grande River with the Taos Resource Area is no longer adequate to monitor the growing use and provide the visitor services necessary for resolving conflicts between recreation and wildlife use. A portion of Segment A (from the County Bridge to Lasauses Cemetery) and all of Segment B would be managed as an SRMA with emphasis on providing recreation opportunities and protecting wildlife values. Use of the public lands along the river for grazing, hunting, fishing, and other recreational use would continue along the entire 41-mile river segment. Protection of the free-flowing nature of the river and the outstandingly remarkable values within the corridor is necessary. All 41 miles of the river study corridor have been determined eligible and suitable as an addition to the NWSRS. Segments A and B are potentially classified as scenic and Segment C is potentially classified as wild. The study team recommends the above preliminary administrative actions and asks that they be carried into the proposed RMP/final EIS for full analysis within the proposed plan.



7. INTERIM MANAGEMENT

It is necessary to begin interim protective land management on the segments determined to be eligible for potential additions to the National Wild and Scenic River System. This is based on direction from the BLM *Guidelines for Fulfilling Requirements of the Wild and Scenic Rivers Act,* Section IX *Interim River Management and Protection.*

Segment A (19 miles), Segment B (14 miles), and Segment C (8 miles) have been determined to meet the eligibility requirements for wild and scenic river designation; therefore, the entire 41-mile stretch of river will be under interim management to protect these values until congressional action occurs. See Attachment 7, Federal Register Notice.

Under the joint U.S. Department of Interior (USDI) and U.S. Department of Agriculture (USDA) guidelines, values determining eligibility and classification are protected from management activities or authorized uses (subject to valid existing rights) that could result in adverse impacts. These values will be protected on about 22 percent of the 13,230 total acres. The ACEC protects 2,640 acres. The SRMA totals 4,595 acres and 2,760 of this is within the wild and scenic river corridor and will be protected under interim management..

Some specific objectives for nonimpairment interim management follow:

1. The free-flowing characteristics of the river cannot be modified by additional impoundments, diversions, channelization, and/or riprapping to the extent the BLM is authorized under law.

2. Outstandingly remarkable values must be protected and, to the extent practicable, enhanced.

3. Management actions cannot modify the river corridor to the extent that classification would be changed from wild to scenic (lower 8.0 miles) or from scenic to recreational (upper 33.0 miles).

Exceptions to these specific objectives within this navigable riverway are: rock riprapping in the wildlife refuge by the USFWS along the riverbank; maintenance of three state and county bridge abutments; and U.S. Corp of Engineer river rehabilitation of a trespass rock watergap.

Existing and projected uses along the river corridor will be evaluated in the proposed RMP, and actions will be taken to ensure these uses do not adversely impact the wild and scenic river values. Current uses along the corridor are primarily associated with recreation, wildlife, and livestock grazing. Although recreation itself is considered to be an outstandingly remarkable value along the river, recreation use is growing steadily in Segment C and has the potential to significantly disturb nesting waterfowl/raptors. This increase could result in diminished wildlife reproduction along the river corridor. To minimize additional impacts to wildlife, commercial recreation permits within that portion of the corridor would be restricted to current levels until an adequate assessment of wildlife impacts is completed. A coordinated resource management activity plan (CRMAP) will be developed and implemented after completion of the proposed RMP/final EIS, which will include provisions for protection/enhancement of the river values. This will also ensure that eligibility/classification is not impaired, and any recreation facilities proposed for development (boater put-ins, takeouts, fishing access, etc.) would not impact the classification of the river.

Existing impacts are occurring from livestock grazing, mainly to the riparian zone, and actions will be taken to ensure these current uses do not adversely impact the wild and scenic river values. Potential actions that may be taken are better allotment and watergap fencing, better monitoring, and enforcement of grazing privileges. These potential actions should reduce livestock grazing trespass to better protect the wild and scenic river values.

A Federal Register Notice was issued November 16, 1990, and appropriate public announcements were issued to establish protective interim management of this segment for a period of 5 years to encourage congressional action on the recommendation (see Attachment 7). If Congress does not act within the 5-year period, the interim management would expire, and protective provisions would be re-evaluated prior to re-initiation of the protective management.

Actions will continue for land acquisition (approximately 6,000 acres) along the river corridor to enhance riparian, recreation, and wildlife values (with or without wild and scenic designation) through scenic easement or fee simple acquisition.

Current efforts of aerial and ground surveillance to monitor impacts to eligibility/classification will be upgraded based on funding levels.

8. STUDY GROUP MEMBERS AND CONSULTATION

Study Group Members

The following people assisted in this wild and scenic river study:

John Wilson - District Office Recreation Program Leader/DO Forester

Group Leader; co-author of the original draft river report; assisted in rewrite of the revised river analysis and report.

Bill Miller - Resource Area Recreation Program Leader/Lands Specialist

Lands ownership, mapping and tour coordinator, and co-author of the original draft river report; assisted in rewrite of the revised river analysis and report.

Dave Taliaferro - RMP Project Manager

Study group organizer, RMP liaison, DO liaison, recreation work; co-author of the original draft report; assisted in the rewrite of the revised river analysis and report.

Ken Goodrow - Resource Area Surface Reclamation Specialist

Area office liaison; other resources writeup for original draft report; assisted in the rewrite of the revised river analysis and report.

Clay Bridges - District Office Wildlife Program Leader

Assisted with rewrite of the revised river analysis and report.

Howard Wertsbaugh - District Office Watershed Specialist

Assisted with rewrite of the revised river analysis and report.

Rick Athearn - ACEC Coordinator and State Historian

Assisted with rewrite of the revised river analysis and report.

Eric Finstick - State Wild and Scenic River and Wilderness Specialist

W&SR guidance and assistance, quality control of revised river report, CSO liaison, review coordinator; assisted in the revised river analysis and report.

Bob Wick - District Office Recreation Program Leader

Assisted with rewrite of the revised river analysis and report.

Margot Zallen - Regional Solicitor

Assisted with water rights revision of the revised river analysis and report.

Cheryl Williss - USFWS Water Rights Specialist

Assisted with water rights revision of the revised river analysis and report.

Bev Neuben - RMP Editor/Writer

Assisted with writing and editing the original study report and in the revised river analysis and report.

NOTE: The Cañon City District Manager, Assistant District Manager for Resources, and the San Luis Resource Area Manager were involved in management direction and quality control. Many other BLM Colorado State Office and New Mexico State Office, BLM Cañon City District Office and Albuquerque District Office, BLM San Luis Resource Area Office, and Taos Resource Area Office staff were utilized during the process to assist in gathering resource information.

Consultation

A total of 178 letters were received commenting on the *San Luis Draft Resource Management Plan/Environmental Impact Statement* (September 1989). Public hearings were held in Alamosa and Denver and 32 people gave oral testimonies. About 100 letters indicated more of the Rio Grande River should be recommended for wild and scenic designation; 11 letters addressed concerns regarding water rights and objected to any portion of the river being recommended for designation. Eleven people giving oral testimony requested more of the Rio Grande River be recommended for designation and 13 opposed recommendation. Several others voiced concerns regarding the effects designation would have on individual water rights and wanted more clarification.

Following the close of the comment period on the draft RMP/final EIS (December 1989), meetings were requested by various groups including water users, environmental groups, and BLM solicitors. At the request of the congressional delegation, their aides were given a tour of the river corridor from the County Bridge down to the state line.

Attachment 1

SUMMARY OF THE REVIEW OF VARIOUS STREAMS/RIVERS WITH BLM OWNERSHIP

Name of Stream/River	Miles of BLM Ownership	Meets W&SR Eligibility Criteria #1 (Free-flowing Values)	#2 (Outstanding Remarkable Values)
Lower Ford Creek	1.5	yes	no
Middle Ford Creek	0.5	yes	no
Upper Ford Creek	1.0	yes	no
Baxter Creek	1.5	yes	no
Lower Tuttle Creek	1.0	yes	no
Upper Tuttle Creek	1.0	yes	no
Lower Sheep Creek	0.3	yes	no
Upper Sheep Creek	1.7	yes	no
Cross Creek	0.5	yes	no
Kerber Creek	0.5	yes	no
Alder Creek	0.4	yes	no
Fisher Creek 1/	0.5	yes	no
Rito Alto Creek	0.3	yes	no
Black Canyon Creek	0.8	yes	no
Quarry Creek	0.3	yes	no
Upper Raspberry Creek	0.5	yes	no
Lower Raspberry Creek	0.5	yes	no
Eaglebrook Gulch Creek	0.6	yes	no
Saguache Creek	0.3	yes	no
Spanish Creek	0.3	yes	no
Rock Creek	0.2	yes	no
Middle San Luis Creek	0.3	yes	no
Upper San Luis Creek	0.6	yes	no
Dorsey Creek	0.5	yes	no
Upper Garner Creek	0.3	yes	no
Middle Garner Creek	0.3	yes	no
Lower Garner Creek	1.7	yes	no
Cotton Creek	0.8	yes	no
Rio Grande (Upper Box)2/	7.0	yes	yes
Rio Grande (Lower Box)2/	5.0	yes	yes
La Jara Creek	2.5	yes	no
Alamosa River	2.0	yes	no
Total	35.2		

1/ This is a portion of the head of San Luis Creek.

2/ These two areas are included in the 41-mile stretch of the Rio Grande River Corridor to be studied and carried forward into the analysis in the DRMP/DEIS and the PRMP/FEIS.

Attachment 2

SOME APPROXIMATE CALCULATIONS ON THE 41-MILE RIO GRANDE WILD AND SCENIC RIVER STUDY AREA

The acreage calculations are based on one-half mile width and 1-mile length equaling 320 acres.

Segment A

From New Ditch Dam in the Alamosa NationalWildlife Refuge downriver to the southern edgeof the refuge - 7.7 miles (2,470 acres approximately)

Private ownership	(620 acres/about 25%)
USFWS land	(1,850 acres/about 75%)

From the southern edge of the refuge downriver to the County Bridge - 4.0 miles (1,280 acres approximately)

Private ownership	(1,160 acres/about 91%)
BLM-administered land	(120 acres/about 9%)

From the County Bridge downriver to the Lasauses Cemetery - 7.3 miles (2,440 acres approximately)

Private ownership	(2,370 acres/about 98%)
BLM-administered lands	(70 acres/about 2%)

Segment A - 19.0 miles total (6,190 acres approximately)

Private ownership	(4,150 acres/about 67%)
USFWS land	(1,850 acres/about 301%)
BLM-administered land	(190 acres/about 3%)

Segment B

From Lasauses Cemetery downriver to the State Highway Bridge - 4.4 miles (1,410 acres approximately)

Private ownership	(650 acres/about 46%)
BLM-administered lands	(760 acres/about 54%)

From State Highway Bridge downriver to Lobatos Bridge - 8.0 miles (2,560 acres approximately)

Private ownership	(2,130 acres/about 83%)
BLM-administered lands	(430 acres/about 17%)

From Lobatos Bridge downriver to mouth or upper end of the gorge - 1.6 miles (510 acres approximately)

Private ownership	(420 acres/about 82%)
BLM-administered land	(90 acres/about 18%)

Segment B - 14.0 miles (4,480 acres approximately)

Private ownership	(3,200 acres/about 71%)
BLM-administered land	(1,280 acres/about 29%)

Appendix A

Segment C

From the upper end of the gorge downriver to the New Mexico StateLine - 8.0 miles(2,560 acres approximately)

Private ownership	(1,200 acres/about 47%)
BLM-administered land	(1,360 acres/about 53%)

Total Segments

Total study length - 41.0 miles (13,230 acres approximately)

Private ownership	(8,550 acres/64%)
USFWS lands	(1,850 acres/14%)
BLM-administered land	(2,830 acres/22%)

Of the streambank ownership, approximately 50 percent is in public ownership.

Attachment 3

ELIGIBILITY DETERMINATION CRITERIA

The following criteria is taken from the *Guidelines for Fulfilling Requirements of the Wild and Scenic Rivers Act* of September 1988:

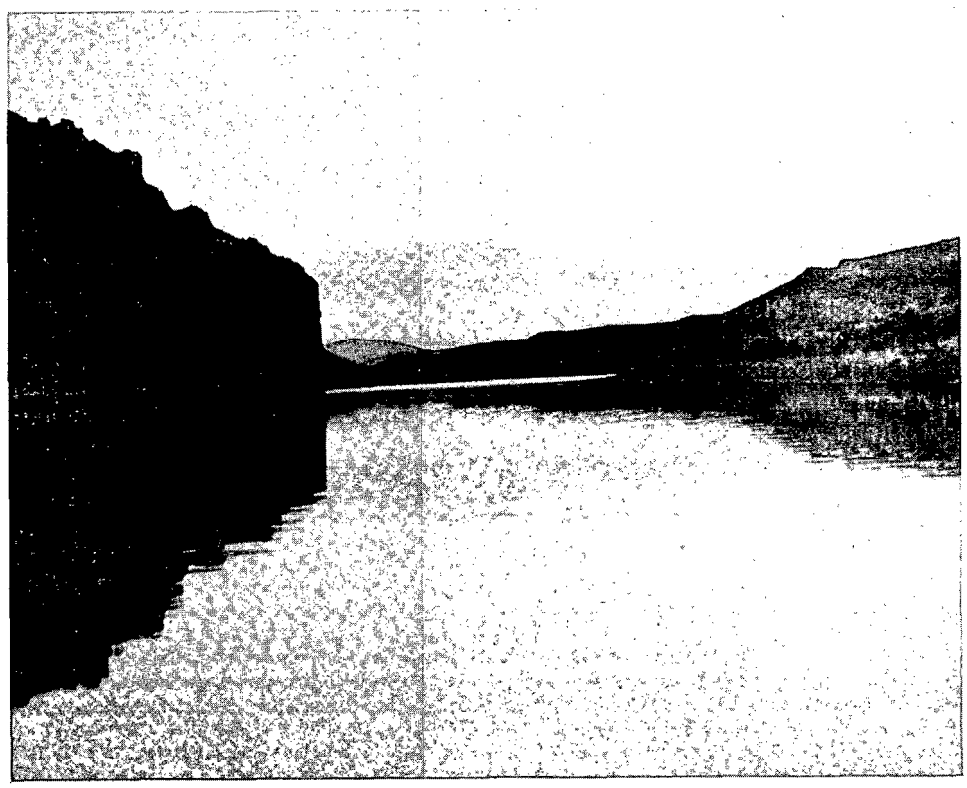
1. Determination of Eligibility. As a part of the first step, to be eligible for inclusion, a river must be "free-flowing" and, with its adjacent land area, must possess one or more "outstandingly remarkable" values. The eligibility of a river for the National System is determined by applying the criteria in Sections 1(b) and 2(b) of the Wild and Scenic Rivers Act, as interpreted by the USDI-USDA Guidelines.

a. Criteria

1) *Free-Flowing Values.* Free-flowing is defined by Section 16(b) of the Act as "existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping, or other modification of the waterway." The existence of low dams, diversion works, and other minor structures at the time the river segment is being considered shall not automatically disqualify it for a possible addition to the National Wild and Scenic River System. A river segment may, in fact, flow between large impoundments and may qualify if conditions within the segment meet the eligibility criteria.

2) *Outstandingly Remarkable Values.* For any river segment to be eligible for designations to the National Wild and Scenic Rivers System, one or more of the following values within the river area must be outstandingly remarkable: scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values. Only one such value is needed for eligibility and is a subjective judgment. Although several river segments on public lands may possess similar values, each river must be looked at individually and may be outstandingly remarkable when considered in a regional, State, or national context.

b. Study Team. The determination that a river area contains one or more outstandingly remarkable values is a professional judgment on the part of the study team. Study team members may be part of an interdisciplinary (RMP) team or a separate team comprised of invited professionals from interested local, State, or Federal agencies to participate in the study.



Attachment 4

ATTRIBUTES AND MANAGEMENT OBJECTIVES OF THE THREE RIVER CLASSIFICATIONS FOR INCLUSION IN THE NATIONAL WILD AND SCENIC RIVERS SYSTEM

Attributes

Wild	Scenic	Recreation
1. Free-flowing. Low dams, diversion works or other minor structures which do not inundate the natural riverbank may not bar consideration as wild. Future construction restricted.	1. Free-flowing. Low dams, diversion works or other minor structures which do not inundate the natural riverbank may not bar consideration. Future construction restricted.	1. May have undergone some impoundment or diversion in the past. Water should not have characteristics of an impoundment for any significant distance. Future construction restricted.
2. Generally inaccessible by road. One or two inconspicuous roads to the area may be permissible.	2. Accessible by roads which may occasionally bridge the river area. Short stretches of inconspicuous and well-screened roads or railroads paralleling river area may be permitted.	2. Readily accessible with likelihood of paralleling roads or railroads along river banks and bridge crossings.
3. Shorelines essentially primitive. One or two inconspicuous dwellings and land devoted to production of hay may be permitted. Watershed natural-like in appearance.	3. Shoreline largely primitive. Small communities limited to short reaches of total area. Agricultural practices which do not adversely affect river area may be permitted.	3. Shoreline may be extensively developed.
4. Water quality meets minimum criteria for primary contact recreation except where such criteria would be exceeded by natural background conditions and esthetics and capable of supporting propagation of aquatic life normally adapted to habitat of the stream.	4. Water quality should meet minimum criteria for desired types of recreation except where such criteria would be exceeded by natural background conditions and esthetics and capable of supporting propagation of aquatic life normally adapted to habitat of the stream, or is capable of and is being restored to that quality.	4. Water quality should meet minimum criteria for desired types of recreation except where such criteria would be exceeded by natural background conditions and esthetics and capable of supporting propagation of aquatic life normally adapted to habitat of the stream or is capable of and is being restored to that quality.

Management Objectives

Wild	Scenic	Recreation
1. Limited motorized land travel in area.	1. Motorized vehicles allowed on land areas.	1. Optimum accessibility by motorized vehicle.
2. No inharmonious or new habitations or improvements permitted.	2. No inharmonious improvements and few habitations permitted.	2. May be densely settled in places.
3. Only primitive-type public use provided.	3. Limited modern screened public use facilities permitted; i.e., campgrounds, visitor centers, etc.	3. Public use areas may be in close proximity to river.
4. New structures and improvement of old ones prohibited if not in keeping with overall objectives.	4. Some new facilities allowed, such as unobtrusive marinas.	4. New structures allowed for both habitation and for intensive recreation use.
5. Unobtrusive fences, gauging stations and other management facilities may be permitted if no significant adverse effect on natural character of area.	5. Unobtrusive fences, gauging stations and other management facilities may be permitted if no significant adverse effect on natural character of area.	5. Management practice facilities permitted.
6. Limited range of agriculture land other resource uses permitted.	6. Wide range of agriculture and other resource uses may be permitted.	6. Full range of agriculture land other resource uses may be permitted.

Attachment 5

DETERMINATION OF SUITABILITY

The following is also taken from the *Guidelines for Fulfilling Requirements of the Wild and Scenic Rivers Act* of September 1988:

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 prescriptions, the RMP should document the classification category of the appropriate segment(s) (wild, scenic, and/or recreational), 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 WSR rivers, which are determined nonsuitable for designation, can be released from further study only by State Directors through the RMP record of decision. For suitable WSR rivers, a separate appendix to the RMP and EIS document is encouraged for ease in preparing the WSR 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.

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, in-fringe, 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) WSR River Studies: Studies of rivers under this Section of the Act will be discontinued upon a finding of noneligibility in the BLM resource management planning process or subsequent WSR river study. In RMPs, the documentation supporting the eligibility assessment will normally be put in an appendix to either the RMP or the associated EIS.

2) Legislatively Mandated Studies: If a section 5(a) study river is found to be noneligible, 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.

Attachment 6

UNITED STATES DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
ALAMOSA/MONTE VISTA NATIONAL WILDLIFE REFUGE
9383 El Rancho Lane
Alamosa, Colorado 81101

July 5, 1990

MEMORANDUM

TO: Dennis Zachman, Area Manager, San Luis Resource Area, BLM

FROM: Refuge Manager, Alamosa/Monte Vista NWR

SUBJECT: National Wild and Scenic River System Designation for the Rio Grande River in Alamosa, Costilla and Conejos Counties, Colorado

Thank you for inviting us to meet with you on June 22 to discuss the above subject. We learned a great deal about BLM's views on the above subject, especially the classification criteria associated with Recreational river areas within the system.

We feel the stretch of the Rio Grande adjacent to and running through the Alamosa National Wildlife Refuge should not be included in the National Wild and Scenic River system due to the following:

1. Water management on Alamosa NWR requires the diversion of river water at two major points. One being at the Chicago Ditch Dam located just south of Hwy 160 and the other at the New Ditch Dam located about 1-1/2 miles south of our refuge headquarters. While some river water generally flows through out Chicago Dam structure even while we are diverting water, very little (and sometimes no) water passes through the New Ditch Dam structure when we divert. However, all water return flows re-enter the river at the refuges southern most boundary located about 5 mile downstream of the New Ditch Dam structure.

2. All public use on the refuge is permitted during daylight hours only. For wildlife viewing purposes we allow walking, hiking, and bicycling adjacent to the river along a 3 mile stretch south of our headquarters. River stretches about 1 mile above our headquarters as well as about 5 miles below the aforementioned 3 mile open area are closed to the public. Both the daylight hours only as well as the closed areas restrictions are necessary to minimize disturbances to wildlife and still provide adequate sanctuary.

We do feel the Rio Grande highly deserves National Wild and Scenic River designation from the LaSauces bridge down stream to the State line and will gladly support that effort.

If we can be of further assistance, please contact us.

cc: Ray Rauch
Paul Zogg, Colorado Wildlife Federation

Attachment 7

4310JB

DEPARTMENT OF INTERIOR

Bureau of Land Management

[CO-050-4333-09]

Notice of Interim Management for Protection of Wild & Scenic River Values

AGENCY: Bureau of Land Management, Interior

ACTION: The Bureau of Land Management, Cañon City District, San Luis Resource Area has determined that 41 miles of the Rio Grande River in Colorado is eligible for consideration as a potential addition to the National Wild and Scenic River System. This determination was made as a part of the San Luis Resource Management Plan process in accordance with the Federal Land Policy and Management Act of 1976 (FLPMA), 43 CFR 1600, the Guidance for the Identification and Evaluation of Potential Additions to the National Wild and Scenic Rivers System, the USDI-USDA Final Revised Guidelines for Eligibility, Classification and Management of River Areas, and BLM Manual Section 1623.41A2d.

SUMMARY: A resource management plan (RMP) is being prepared for the San Luis Resource Area of Colorado. Assessment of potential additions to the National Wild and Scenic River System is included in this planning effort. A total of 32 streams or segments of streams have been analyzed to date, and the 41-mile segment of the the Rio Grande River in Colorado meets the eligibility criteria. This segment of the river is "free-flowing" and has "outstandingly remarkable values;" therefore, this stretch needs adequate interim protection until a final decision is reached.

The 41-mile segment of the Rio Grande River, which is the last 41 miles of this river within Colorado, has been tentatively classified as follows: the upper 33 miles meets the "Scenic" classification criteria, and the lower 8 miles meets the "Wild" classification criteria. These tentative classifications are based on conditions of the river corridor as they exist at this time.

Management activities and authorized uses shall not be allowed to adversely affect the eligibility or classification of this river. Management prescriptions for this river corridor should provide for protection in three ways:

1. The free-flowing characteristics of the river cannot be modified, to the extent that BLM is authorized under law to control stream impoundments and diversions.

2. Outstandingly remarkable values must be protected, and to the extent practicable, enhanced.

3. Management and development of the river corridor cannot be modified to the degree that eligibility or classification is changed.

A study report is being prepared and will be an appendix to the proposed resource management plan/final environmental impact study and documents the application of the Eligibility/Classification/Suitability Criteria. The study report is being included as an integral part of the RMP process documentation. The determination within the RMP will be a preliminary administrative recommendation for designation or nondesignation depending on the suitability analysis. This recommendation will receive further review and possible modification by the Director of the BLM, the Secretary of the Interior, and the President of the United States. Final decisions have been reserved by the U.S. Congress.

DATES: Interim protective management on public lands along this 41-mile river corridor will exist for a period not exceeding 5 years from the date of this publication or until such time as a final decision has been made, whichever occurs first.

FOR FURTHER INFORMATION CONTACT: Interested parties may obtain more information by writing; RMP Project, Bureau of Land Management, P.O. Box 1171, Canon City, Colorado 81215-1171 or by contacting the Project Leader, Dave Taliaferro at (719) 275-0631.

Donnie R. Sparks

Donnie R. Sparks
District Manager

(This notice was issued November 16, 1990)

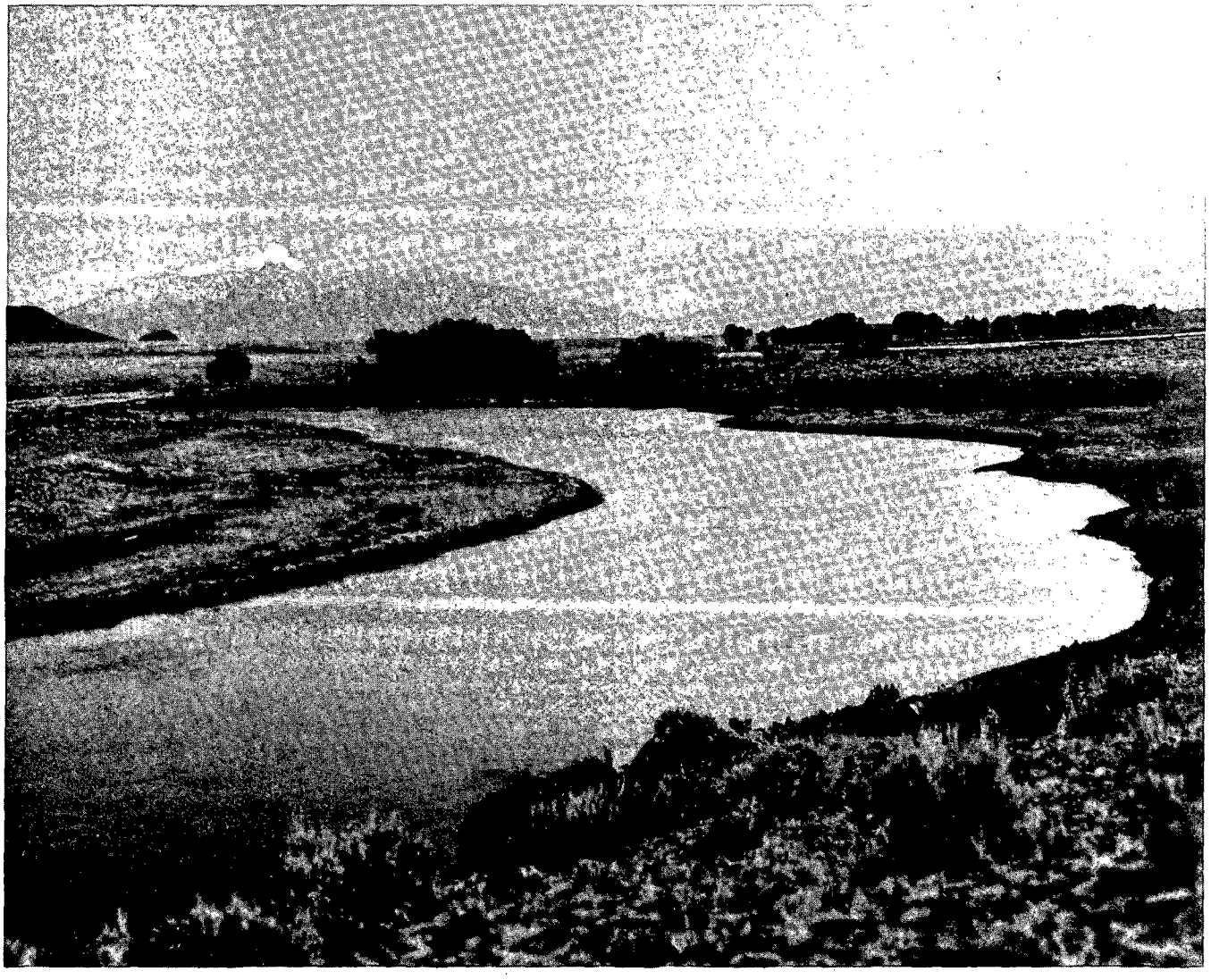


Figure 1

View at dusk looking north up through Segment A of Rio Grande River Corridor from near Lasauses Cemetery

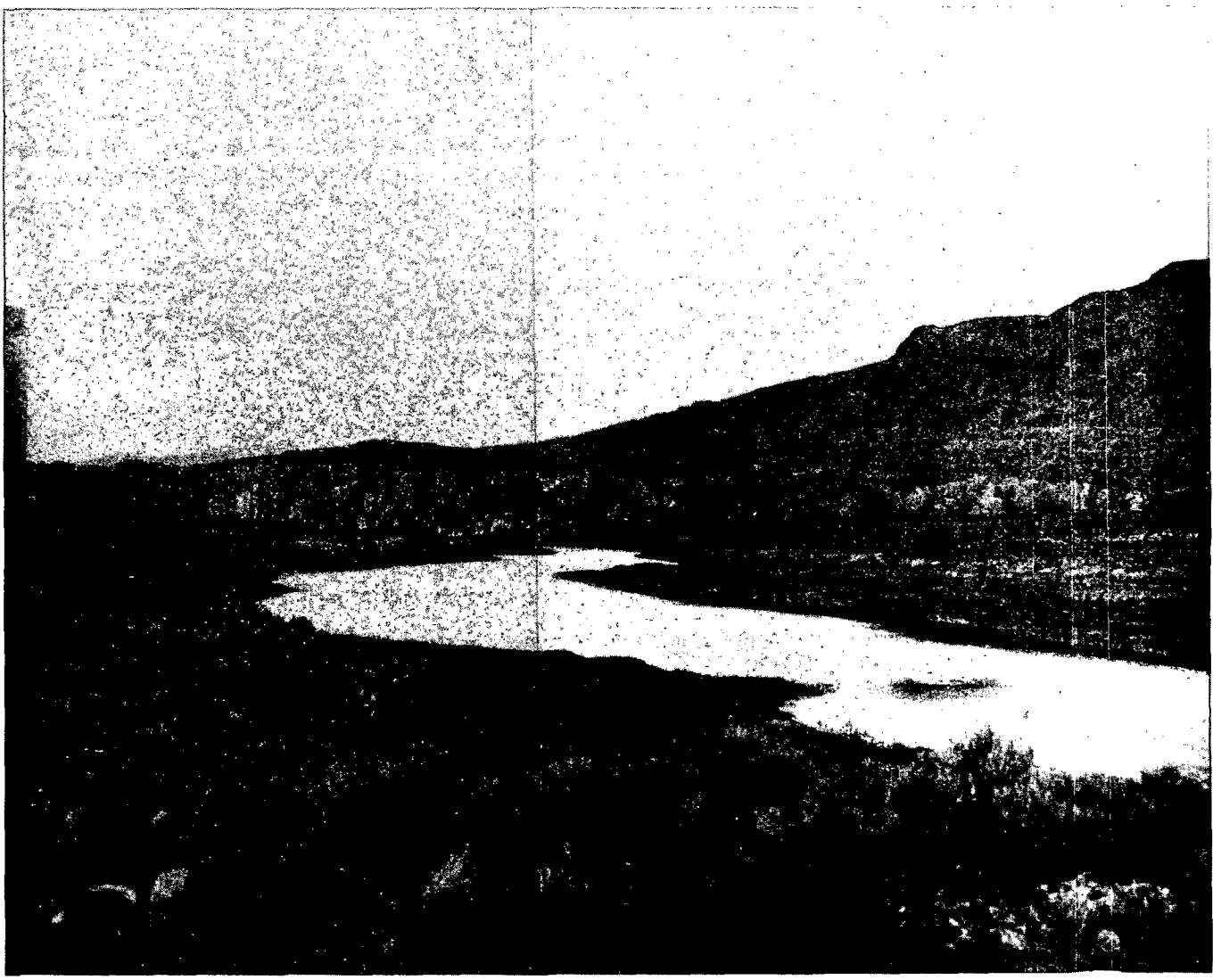


Figure 2

View of Rio Grande River Corridor at dusk in Segment B with Brownie Hills (right) and Fair Hills (left) just below Lasauses Cemetery.

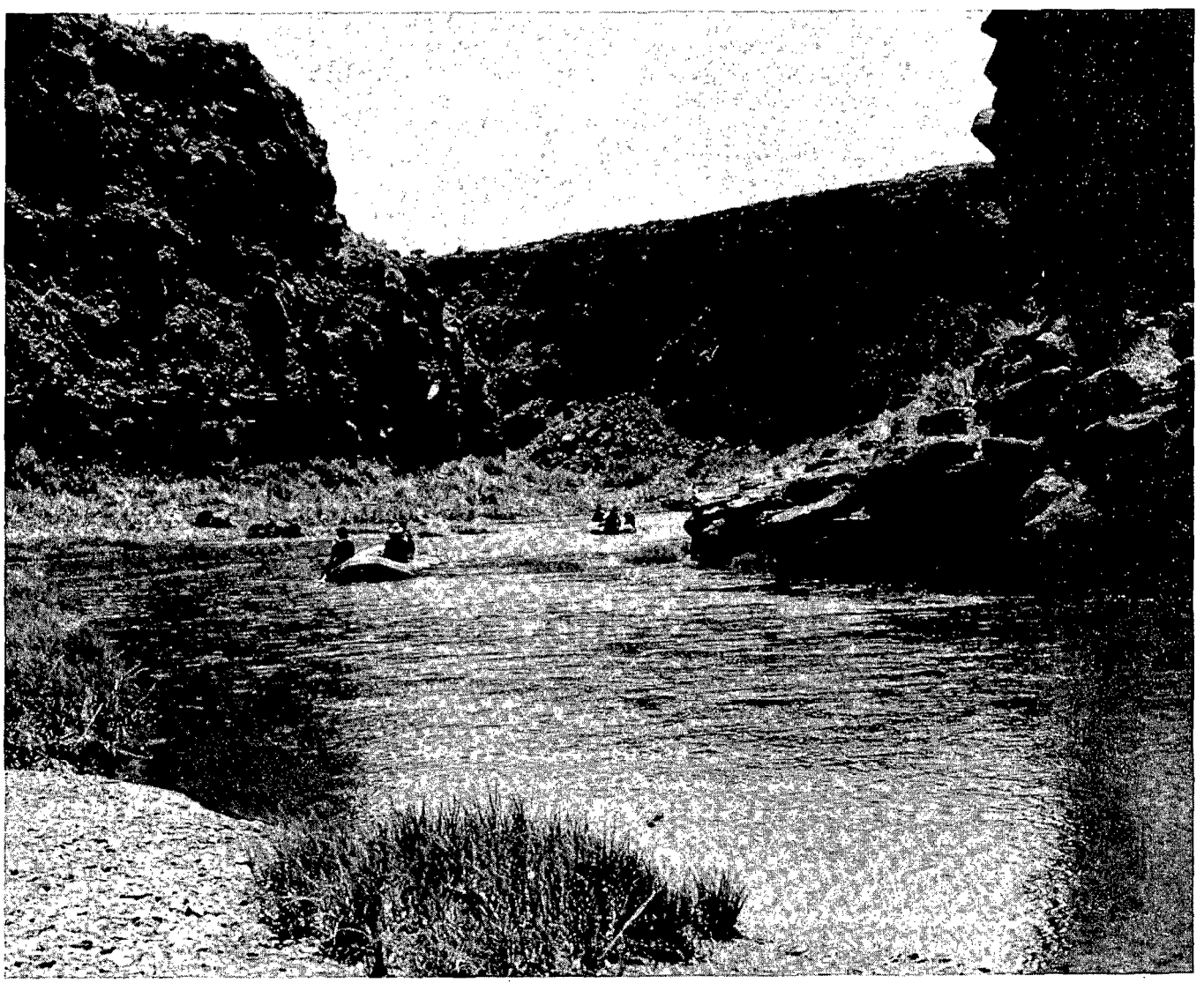
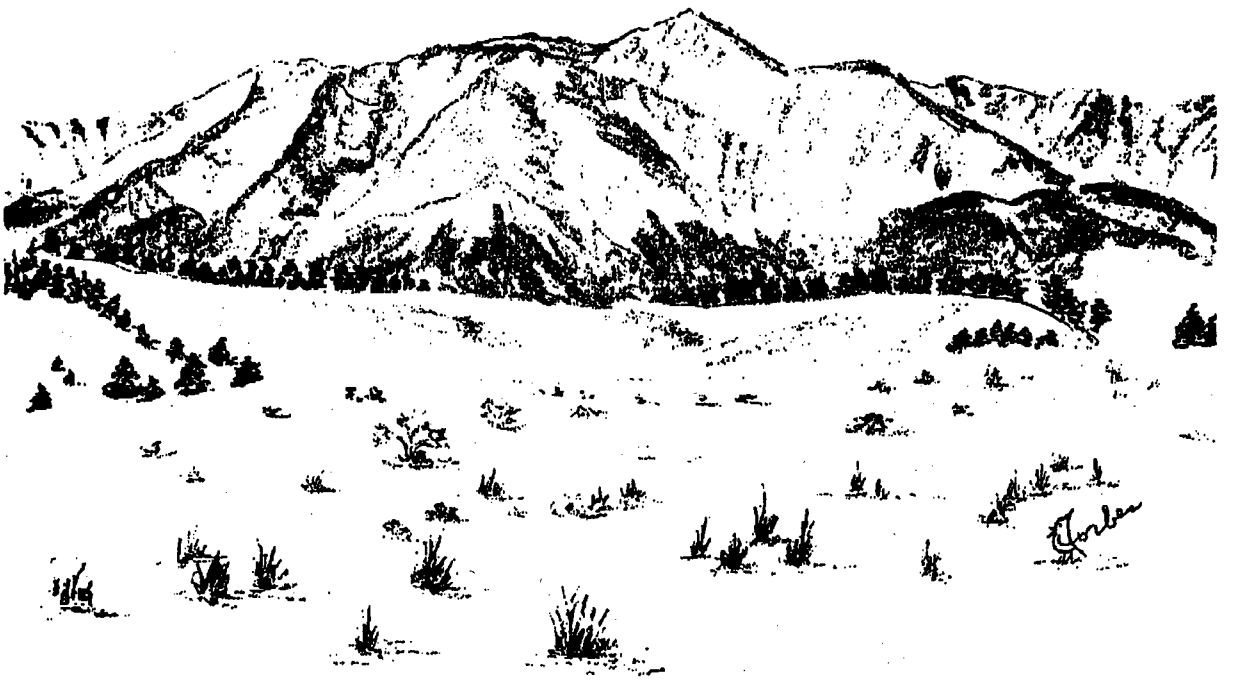


Figure 3

View of recreational rafting in "Lower Box" of Segment C of Rio Grande River Corridor.

APPENDIX B
LETTERS AND ORAL TESTIMONY RECEIVED DURING THE PUBLIC COMMENT PERIOD



APPENDIX B

LETTERS AND ORAL TESTIMONY RECEIVED DURING THE PUBLIC COMMENT PERIOD

All of the public comment letters and oral testimonies are reproduced in this section. Letters are identified by number; hearing testimonies by an "H" plus a number. The relevant comment number is on the letter and hearing transcript in brackets.

acknowledgements

. . . to all the user groups and other people who contacted BLM either through personal contact, letters, or attendance at public hearings and open houses. Your input is very much appreciated. Thank you for your interest in the BLM planning process.

1

DEPARTMENT OF THE AIR FORCE
AIR FORCE REGIONAL CIVIL ENGINEER CENTRAL REGION
1114 COMMERCE STREET
DALLAS, TEXAS 75242-0216

24 OCT 1989

Mr. Thomas Walker, Associate State Director
Bureau of Land Management
Colorado State Office
2850 Youngfield Street
Lakewood, Colorado 80215

Dear Mr. Walker

Thank you for providing us the opportunity to review the Draft San Luis Resource Management Plan and Environmental Impact Statement in Colorado.

We support the BLM's efforts to develop management plans for lands under its control. The issue of primary interest to the Air Force regards the use of established military training areas and routes for aircraft which may traverse these areas. Currently, several Air Force flight training routes traverse a portion of the study area (See atch 1). Military training routes and airspace requirements are subject to change, however, it is not anticipated that significant changes to these routes will occur in the immediate future. In the past, there have been no major problems between the Air Force and the BLM concerning military over flights of lands under your management. However, should a conflict arise, we will assist in establishing liaison between your office and the affected Air Force activities.

Mission requirements, fuel costs, and environmental constraints all contribute to decisions made in locating a military training activity. Because of general aviation and population pressures, low altitude, high speed flights are relegated to those areas least accessible and sparsely inhabited. Therefore, we request that you give full consideration to how
1-1 planning and management decisions might adversely affect the use of low altitude airspace by the Air Force. We believe unrestricted military use of these routes is essential for training and combat effectiveness.

We hope this information is useful in your planning process. We thank you for the documentation previously provided and look forward to continued communication with your office. If additional information is needed, please contact Mr. Raymond Bruntmyer at (214) 653-3341.

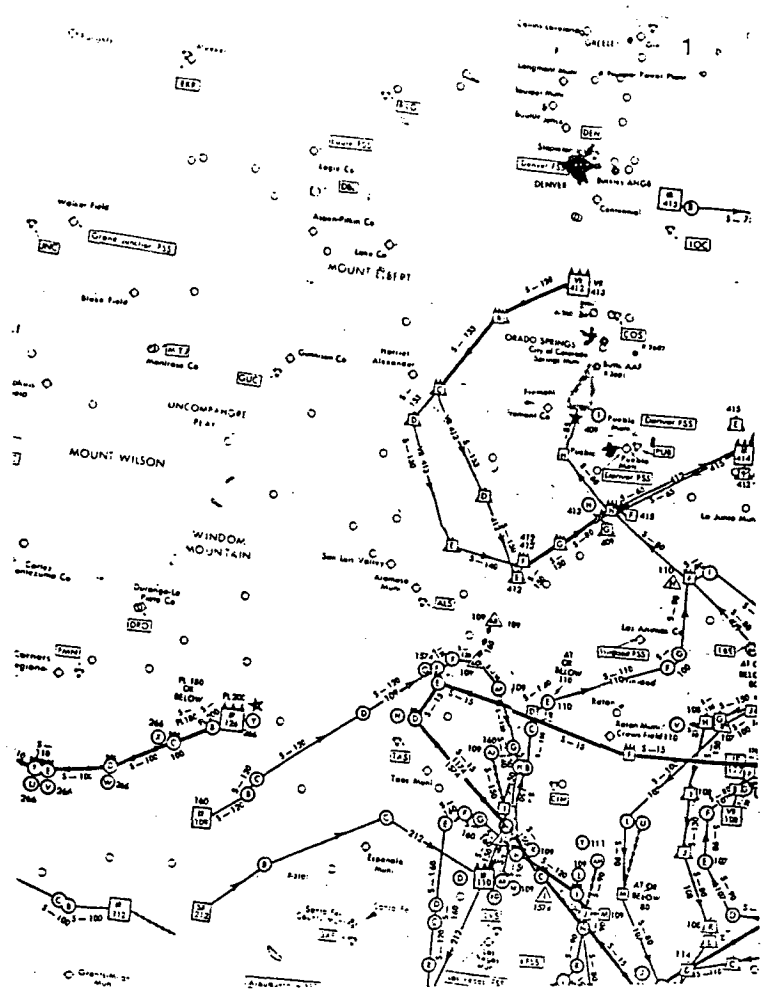
Sincerely

WILLIAM L. COX, Director
Environmental Planning Division

1 Atch
Flight Line Map

Cy to: HQ USAF/LEEVX/LEEVP
Donnie R. Sparks, Dist Mgr
27 TFW/DOTU
140 TFW/DOT
Buckley ANGB CO

1



2

October 23, 1989

David Taliaferro, RMP Team Leader
Bureau of Land Management
Box 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro:

Colorado Environmental Coalition has my wholehearted support on taking these stands on your Bureau's draft Resource Management Plan and Environmental Impact Statement for San Luis Valley:

2-1 - commending its recommending 8 Areas of Critical Environmental Concern
- but insisting that Elephant Rocks be added
2-2 - suggesting that any forage added by range improvements go to wildlife, not livestock
2-3 - opposing the plan to permit the Taos Power Line to run through the Rio Grande Corridor
2-4 - extending Wild and Scenic Designation for RioGrande River an additional 12 miles north to Lasauces Cemetery.

Please accept my thanks for recommending the 8 ACECs and Wild and Scenic Designation of 8.8 miles of RioGrande River. Please also give serious consideration to the changes and additions the Colorado Environmental Coalition recommends after very careful study.

Professor William M. Folger
2390 Locust Street
Denver, Colorado 80207

10-26

3

Please send a copy of the "Resource Management Plan and Environmental Impact Statement for the San Luis Valley" to:

Eleanor C. Mueller
P. O. Box 93
Crestone, CO 81131

I plan to testify at the public hearings in Alamosa Nov 2, during the afternoon hearings.

Please respond by return mail as time is short.

Thank you,
E.C. Mueller

4

Box 373
Cascade, CO 80809
Oct. 23, 1989

Dave Taliaferro
RMP Team Leader
BLM - Canon City District Office
P. O. Box 1171
Canon City, CO 81212

Dear Mr. Taliaferro:

I wish to offer some comments on the San Luis Valley Resource Management Plan and EIS. I have visited the Sand Dunes and some of the waterfowl habitat, but I haven't heard of most of the interesting ACEC's listed in the plan; hope to see some of them next year.

4-1 Areas of critical environmental concern (ACEC's): You've identified a number of these, but you indicate no intention to implement your concern by managing them differently. At the very least, off-road vehicle use should be prohibited. Preferably, these areas should be closed to mineral exploration and leasing too.

4-2 Grazing and range improvements: Range improvement is usually a euphemism for sagebrush destruction. Replacement of sagebrush with some more palatable grazing is generally a temporary measure, creating an unstable plant community which collapses in the next dry year because it does not have the deep roots of sagebrush. It also generally costs more than you can recoup from grazing fees. A rancher's short-term gain from more grazing on public lands is not in the land's long-term interest. Leave the balance between wildlife and livestock as it is.

4-3 Powerline right-of-way: In addition to closing ACEC's to ORV's and mineral exploration, other activities such as powerlines should avoid them. Beyond the present environmental concern, the construction process creates enough new road access that there will be continually increasing damage as vehicles explore the construction roads and surrounding areas.

4-4 Wild and scenic river: The San Luis Valley is distant from the major population centers of Colorado, but is close to many New Mexico people; the area could benefit from a longer stretch of 'Wild and Scenic' river designation to attract some vacationer and tourist dollars. Nine miles is not enough to attract much interest from the raft or canoe people, but 20 or 30 miles probably would.

Thank you,

William A. Costes

William A. Costes

5

John Spezia
Box 2255
Steamboat Springs
Co 80477

Oct 24, 1989

DAVID TALIAFERRO,

I have just looked over the San Luis RMP & EIS that the BLM has printed. Since I am unable to attend the meetings I will write these comments with the hope and request they will be submitted into the testimony.

5-1 I would like to give a vote of thanks for including as many ACEC's as you did. Two points, in addition, I would like to see are, first, include Elephants Lochs be made the 9th ACEC and second, the management of

5-2 these ACEC be substancial, in particular, no ORV's and leasing for oil, gas or minerals be prohibited.

5-3 The power line corridors go over ACEC's and and near a WSA. I don't think this is appropriate and also conflicting use of the Rio Grande, Flat Top Mesa and Piñon Hills areas.

5-4 Since you increasing grazing AUMS, I would like to see some of the money go towards improving wild life range which will be impacted by grazing.

5-5 More W & S designation for the Rio Grande! Should include the 12-13 mile stretch (Lobatos Bridge to Border) The incredible riparian area that attracts, waterfowl, hawks, and other wild life needs protection.

Sincerely,

John Spezia

6

Dave Taliaferro, RMP Team Leader
BLM, Canon City District Office
P.O.Box 1171
Canon City, Co. 81212

October 24, 1989

Sir:

6-1 I have reviewed the draft RMP and EIS of the San Luis area for the organization I represent, the Colorado Association of Four Wheel Drive Clubs, Inc. The preffered alternative appears to be acceptable to us as is. We do not advocate "open" use of ORV's except in areas where there will be no environmental degredation, such as sand. Therefore, proposing that additional areas of limited use be established rather than being left open agrees with our philosophy. We desire that existing roads remain open for four wheel drive use, and in rare instances we advocate connecting roads to form loops or networks, but we don't advocate or condone random, off road travel.

6-2 We do have one concern in the area, however. That concern is the Mt. Planca road, and this we desire to remain open to use and be excluded from the wilderness the U.S.F.S. has proposed. Since the initial mile or so is on BLM land I mention this concern here.

Sincerely:

Bill Hughes

Bill Hughes
Adopt-A-Trail/Land Use Coordinator
Colo. Assn. of 4 Wheel Drive Clubs, Inc.
2201 S. Dearborn St.
Aurora, Co. 80014

7

Mr Dave Taliaferro
RMP Team Leader
Dear Sir:

I am very much interested in the Environment in Canon and the world. The Bureau of Land Management (BLM) have released its draft Resource Management Plan for the San Luis Valley.

7-1 We thank the B.L.M. for recommending 8 ACEC's (Areas of critical environmental Concern). However we request that the B.L.M. add Elephant Rocks to it's list of ACEC's. It is located north of Del Norte and is unique in it's formation and home to many species of rare plants. Elephant Rocks is also significant historically.

ACEC Management. Although the B.L.M. has recommended a good number of ACEC's, they will

7

not be adequately protected from incompatible uses.

7-2 Please insure that the B.L.M. prohibit any, and all mineral leasing, mineral entry, and off-road vehicle (ORV) use within the ACEC's.

Here is the list ACEC's of BLM:

1. Sand Castle Wilderness (recreation archeological)
2. San Luis Hills WSA - crucial winter range
3. Blanca Wildlife Area - major water for bite
4. Rio Grande Corridor - riparian habitat (see)
5. Trickle Mt. - Hook Creek winter range for (some)
6. Cumbres & Toltec R.R. corridor - Nat. Hist. (site) significance
7. Los Mogotes - farming area antelope & (winter range) game
8. Alkali Lake - marsh & pristine condition affords a view of the whole San Luis Valley.

7-3 Grazing BLM lands increase livestock & decrease the forage created by improvements to wildlife instead of livestock.

7-4 Protest Powerline Project!! Thank you.

Sincerely, Lucile Jones.

8

TROUT UNLIMITED

Dean Swanson
Vice President

Rocky Mountain Region
302 Kelly Ct
Wheatridge, CO 80033
H-303-422-1566 • W-277-2369

10/25/89

Dave Taliaferro
RMP Team Leader
BLM - Canon City District office
p.o. Box 1171
Canon City, CO 81212,

Dear Mr Taliaferro,

Congratulations on your efforts to designate 8-ACEC's in the San Luis Valley! With our increasing population and development it is important to protect some of our precious natural areas.

Further suggestions:

8-1 1. please add Elephant Rocks to your list of ACEC's,

8-2 2. please decrease increased forage to wildlife rather than to livestock,

8-3 3. Do not allow the Taos powerline to run through the protected areas,

8-4 4. please expand the Rio Grande corridor an additional 12.3 miles to the Lasauces Cemetery.

General population surveys show that the American populace feels that our environmental treasures must be protected. Hunting, fishing, and tourism is a multi-billion dollar business in Colorado and we need to maximize this economic benefit.

Sincerely,

America's Leading Coldwater Fisheries Conservation Organization
Washington, D.C. Headquarters: 501 Church Street, Northeast • Vienna, Virginia 22180 • 703-281-1100

9

10-20-89
PO Box 317
Grand Lake, Co.
80447

Dave Taliaferro
RMP Team Leader
BLM - Canon City Dist. Off.
PO Box 1171
Canon City, Co. 81212

Dear Mr. Taliaferro:

I commend you for recommending 8 Areas of Critical Environmental Concern in your draft Resource Management Plan & Environmental Impact Statement for the San Luis Valley. However, I believe Elephant Rocks should be added to the list of ACEC's,

9-1 it's unique geology + biodiversity.

Also, I believe there should be stronger protection from incompatible uses. I believe it should prohibit mineral leasing, mineral entry, off-road vehicle use within ACEC's. I also oppose

9-3 construction of the Taos powerline thru the Rio Grande Corridor, & I recommend extending

9-4 Wild + Scenic designation of the Rio Grande 12.3 miles north to Lasauces Cemetery.

I would like to see forage created by the

9-5 improvements allocated to wildlife rather than livestock.

Sincerely,

Ray "Lone Eagle" M.

10

United States Department of the Interior

BUREAU OF MINES

P. O. BOX 25086
BUILDING 20, DENVER FEDERAL CENTER
DENVER, COLORADO 80225

Intermountain Field Operations Center

October 26, 1989

Memorandum

To: Dave Taliaferro, RMP Team Leader, Bureau of Land Management, Canon City District Office, P.O. Box 1171, Canon City, CO 81212

From: Chief, Intermountain Field Operations Center

Subject: Review of draft San Luis Resource Management Plan and Environmental Impact Statement

As requested by Donnie R. Sparks, BLM District Manager, Bureau of Mines personnel reviewed the subject document (RMP/EIS) regarding proposed management of 520,677 acres of public land and 101,926 acres of federal mineral estate totaling approximately 621,000 acres. Four resource management alternatives are presented in the RMP/EIS. The existing management and resource production enhancement alternatives offer the most opportunities for mineral leasing, location, and sales. The preferred alternative strikes a balance between natural resource enhancement and resource production enhancement alternatives. Comparing the existing management and preferred alternative options, no significant differences are in the acreage closed to leasing (0.5%) and location (2%) respectively.

The RMP/EIS is comprehensive, well organized, and minerals are adequately discussed. However, a few suggestions may be helpful. Geothermal springs and wells (table 2-6, p. 2-12) and 2,242 acre geothermal lease (p. 2-9) should be shown on leasable minerals-geothermal map 2-3b. Mining districts and mineralized areas (table 2-7, p. 2-12) should be shown on locatable minerals map 2-4 since township/range locators are not shown.

Thank you for the opportunity to comment.

William Cochran
Chief, IFOC

11

October 30, 1989

Dave Taliaferro
RMP Team Leader
BLM - Canon City Dist. Office
P.O. Box 1171
Canon City, Co 81212

RE: RMP/EIS - San Luis Valley

Dear Mr. Taliaferro:

I am writing to submit written comments on the BLM's draft Resource Management Plan and Environmental Impact Statement for the San Luis Valley. In general, I support BLM's listing of 8 Areas of Critical Environmental Concern. However,

11-1 I urge the addition of the Elephant Rocks area to that list.

11-2 Moreover, a powerline proposed to run through the Rio Grande Corridor west to Flat Top Mesa and the Pinon Hills Wilderness Study Area should be re-routed. Finally, please consider extending

11-3 to the Lasauces Cemetery your recommendation for wild and scenic designation on the Rio Grande River.

Thank you for your consideration.

Yours truly,

Brad Cameron
1055 Logan #1206
Denver, Co 80203

12

October 27, 1989

Pat Humphry
296 Eighth Street
Carbondale, CO 81623-1706
303-963-0858

Dave Taliaferro
RMP Team Leader
BLM-Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Dear Mr. Taliaferro:

I would like to thank the BLM for designating the eight Areas of Critical Environmental Concern, namely: Sand Castle Wilderness Study Area, San Luis Hills WSA, Blanca Wildlife Area, Rio Grande Corridor, Trickle Mtn. Area/Ford Creek, Cumbres and Toltec Railroad Corridor, Lost Mogotes, and Flat Top Area. However, I would like the BLM to add Elephant Rocks to this list,
1 which is located north of Del Norte and is unique in its formation and home to many species of rare plants. It is also of historical significance.

The BLM has recommended a substantial number of ACECs but
2 has not protected them from incompatible uses. I would like to insist the the BLM prohibit any and all mineral leasing, mineral entry, and off-road vehicle (ORV) use within the ACECs. I would
3 also like to suggest that the BLM dedicate any forage created by range improvements to wildlife instead of to livestock. I also protest the plan permitting utility companies to construct the Taos powerline which would run through the Rio Grande Corridor west to Flat Top Mesa and Pinon Hills WSA. All of these areas
4 are to be designated ACECs in the plan, and a powerline would not be compatible with protecting the natural and scenic qualities of these areas.

I understand that the BLM has recommended only 8.8 miles of the Rio Grande River for Wild and Scenic Designation in Colorado, from the Lobatos Bridge south to the New Mexico border. I would
5 like to recommend that the BLM extend the designation an additional 12.3 miles north to the Lasauces Cemetery, as this portion has equally outstanding characteristics.

I hope the BLM will consider my comments and concerns to insure that public lands in the San Luis Valley are properly managed and protected.

Sincerely,

Pat Humphry

Pat Humphry

13

October 27, 1989

Constance Harvey
421D A.A.B.C.
Aspen, CO 81611
303-925-3272

Dave Taliaferro
RMP Team Leader
BLM-Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Dear Mr. Taliaferro:

I would like to thank the BLM for designating the eight Areas of Critical Environmental Concern, namely: Sand Castle Wilderness Study Area, San Luis Hills WSA, Blanca Wildlife Area, Rio Grande Corridor, Trickle Mtn. Area/Ford Creek, Cumbres and Toltec Railroad Corridor, Lost Mogotes, and Flat Top Area.
13-1 However, I would like the BLM to add Elephant Rocks to this list, which is located north of Del Norte and is unique in its formation and home to many species of rare plants. It is also of historical significance.

13-2 The BLM has recommended a substantial number of ACECs but has not protected them from incompatible uses. I would like to insist the the BLM prohibit any and all mineral leasing, mineral entry, and off-road vehicle (ORV) use within the ACECs. I would
13-3 also like to suggest that the BLM dedicate any forage created by range improvements to wildlife instead of to livestock. I also protest the plan permitting utility companies to construct the Taos powerline which would run through the Rio Grande Corridor
13-4 west to Flat Top Mesa and Pinon Hills WSA. All of these areas are to be designated ACECs in the plan, and a powerline would not be compatible with protecting the natural and scenic qualities of these areas.

13-5 I understand that the BLM has recommended only 8.8 miles of the Rio Grande River for Wild and Scenic Designation in Colorado, from the Lobatos Bridge south to the New Mexico border. I would like to recommend that the BLM extend the designation an additional 12.3 miles north to the Lasauces Cemetery, as this portion has equally outstanding characteristics.

I hope the BLM will consider my comments and concerns to insure that public lands in the San Luis Valley are properly managed and protected.

Sincerely,

Constance Harvey /pk

Constance Harvey

14

[illegible]
[illegible], Colorado [illegible]
November [illegible], 1989

Dave Taliaferro
RMP Team Leader
BLM Canon City District Office
Box 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro:

Regarding the RMP for the San Luis Valley, please record the following comments.

14-1 I am pleased with your designation of ACECs for that region. However, Elephant Rocks should be included in this list because of the important scenic values and plant communities therein.

14-2 Additionally, the ACECs should be protected from off-road vehicle use and other permanent, irreparable damages. The acreages of land protected from such impacts are already far too few.

14-3 No increase in livestock on these BLM lands should be planned until protection and repair of delicate riparian communities is thoroughly planned and implemented and proven. I commend your plans for range improvement, and suggest that additional forage be granted to wildlife until damaged riparian regions have been fully repaired.

14-4 Finally, the Taos Powerline project, which would cross ACECs is an example of the type of irreversible impact which we must become wise enough to avoid. A more suitable route should be found.

Sincerely,

USDI BLM
Canon City, Colo.
[illegible] 9 '89

15

Hobart N. Dixon, Ph.D.
84 San Juan
Alamosa, CO 81101
7 November 1989

Dave Taliaferro
RMP Team Leader
Bureau of Land Management
Canon City District Office
P. O. Box 1171
Canon City, CO 81212

RE: SAN LUIS RESOURCE MANAGEMENT PLAN

Dear Mr. Taliaferro:

This letter is in support of oral comments that I made at the public hearing in Alamosa on November 2, 1989, regarding the San Luis Resource Management Plan.

SAND CASTLE AREA:

15-1 1. The tract to the west of Great Sand Dunes should be closed to any motorized vehicles. This area is a fragile ecosystem dominated by scattered greasewood and rabbitbrush with sparse dry-land grasses and salt grass. Easily damaged or destroyed by vehicular traffic, this plant community stabilizes the soil and may be responsible for the stability of the main mass of the dunes.

15-2 2. In this locality there are occasional wetlands where the water table rises above the surface in small depressions. These wetlands include many species of plants (including *Cleome multicaulis*, a plant which the draft lists as one deserving special consideration) and supports many species of birds, mammals, and amphibians. To allow off-road vehicles access to these wetlands can only seriously damage them.

15-3 3. The Sand Castle area also has large resident populations of antelope, deer, and, presently, a herd of more than 100 elk. Motorized traffic would not be in the best interest of these animals.

15-4 4. Of great concern in the area are historical and archeological sites. At one time the Liberty Stage Road traversed the area and there are many paleo-indian (Folsom) sites. To allow vehicular traffic is to encourage the plundering of these sites, an activity which seems to be the primary goal of many four-wheelers who now use the area.

15-5 5. The Great Sand Dunes adjacent to Sand Castle is a Wilderness. The Park Service attempts to maintain fences in the area, but with the rapidly shifting sand these barriers are ineffectual as they are either covered by sand or undermined. There is a great danger of heavy off-road vehical usage originating in the study area on the Dunes Wilderness.

15-6 6. The numbers of people killed or seriously injured while riding all-terrain vehicles is staggering. There is a real threat that lawsuits against the BLM may result from death or injuries to riders in the Sand Castle Area.

15

H. N. Dixon, 7 November 1989 (page 2)

15-7 ALTERNATIVES TO SAND CASTLE FOR OFF-ROAD VEHICLE USE:
The State of Colorado and the Bureau of Reclamation are developing San Luis Lake and the surrounding locale for recreation. It would be practical and expedient to develop off-road vehicle trails there in conjunction with these activities to replace those proposed at Sand Castle.

15-8 BLANCA CHAINING REHABILITATION:
I have studied both the North and South Chained Areas and recommend that no action be taken in either of these two tracts. Pinyons are re-establishing themselves naturally, especially on the North Chaining, and the scars from these operations probably will not be obvious in another 20 years. It would be a waste of time, effort, and money to do rehabilitation work there.

Respectfully submitted,

Hobart N. Dixon

Hobart N. Dixon, Ph.D.
Plant Ecologist

16

Trailhead Ventures
P.O. BOX 2023, BUENA VISTA, COLORADO 81211
PHONE: ~~(303) 395-8001~~ 719

November 8, 1989

Dave Taliaferro, RMP Team leader
BLM - Canon City District
P.O. Box 1171
Canon City, Co. 81212

Dear Mr. Taliaferro:

These comments relate to the RMP/EIS for the San Luis Valley.

We appreciate your recommending eight areas for Critical Environmental Concern designation.

16-1 However, we feel the Elephant Rocks area near Del Norte should be included for designation because of unique geology and flora.

16-3 We also feel the Rio Grande River designation should be extended north to Lasauces Cemetery.

16-2 We feel these areas can be adequately protected only by prohibiting all grazing, mineral leasing or entry, ORV use and powerline construction.

Sincerely,

Dick + Jan Scar

Dick & Jan Scar

"We Are One: You And I, Earth And Sun, Wind And Sky"

9 Nov, 1989

Dave Taliaferro
BLM-Canon City, CO

7700 W. 61st Av. #12
Arvada, CO. 80004

Dear Sir,

As you know we here in Colorado are severly depressed economically compared with the east coast & the west coast. We are also getting a lot of bad press from all the pollution we are finding more & more of.

One solution to both problems is to include more lands & rivers in the appropriate wilderness protection catagory. Doing so will create much non-polluting, renewable business in the tourist industry which is already well established here in Colorado.

Some areas that need to be so designated are:

17-1 ① the Rio Grande river for a distance at least 25 mi N. of New Mexico.

17-2 ② the Chama narrow gage railroad corridor - the whole thing.

③ Sand Castle archaeological site.

17-3 Also it must be said that off road vehicles must be eliminated from these such areas.

I am an offroad vehicle user & camper but I know how destructive these vehicles are thusly.

Sincerely

Gary [illegible]

[illegible]
Box [illegible]
Canon City, Co 81212

11/12/89

Dear Dave,

I wish to comment on the San Luis Draft Resource Management Plan. I am particularly concerned about the recommendation for wild/scenic designation on the Rio Grande.

18-1 I am glad to see the recommendation made of the River for potential designation. However I feel that an additional 12.3 miles should be protected (to Pinkerton Canyon). Remember that the first 50 miles or so of the River in New Mexico are protected, these miles, receive designation on Colorado is very appropriate.

18-2 I hope also that you will recommend that all of the following be designated as ACECs: Sand Castle, Sand Dune Wilderness Study Area, Rio Grande Corridor, Trujillo Mountain/Sand Hills, Dunes, & Tobe Harrison Canyon, Sea Mountain, Flat Top, Elephant Rocks, Bishop Rock. I understand that all of these areas have special or unique characteristics (scenic, historical, wildlife archaeological, etc.) that deserve designation and protection.

18-3 The Bill should not create, set of rules or rules for improvements within Study areas in order to avoid impacts. We believe industry is quite strong, and management decisions be adaptive.

18-4 Restrictions on recreations need on & near the Rio Grande to protect sensitive wildlife. The final RMP should have a plan for improving & enforcing these restrictions.

18-5 The BLM should work with Public Service Company to relocate the powerline corridor that runs through Flat Top & Sand Hills areas. There are should have no new non-road structures in them.

I appreciate this opportunity to comment. I hope you will make the changes I have requested.

Sincerely,
Rodney Smith
1030 Fox #9
Denver, Co. 80205

DANIEL CHIRAS

November 15, 1989

Dave Taliaferro
RMP Team Leader
Bureau of Land Management
Canyon City District Office
P.O. Box 1171
Canon City, CO 81212

Dear Mr. Taliaferro:

I'm writing about the BLM's recent draft of the Resource Management and EIS for the San Luis Valley. I want to applaud you for your work and your recommendations.

1 I support designating areas of critical environmental concern and would like to ask that you add Elephant Rocks to the list. It houses a number of rare plant species worth protecting.

2 I would like to see you call for stringent protection on the ACECs. That means no mineral leasing, mineral entry, or off road vehicle use.

3 I'm concerned also with stipulations to increase grazing on BLM lands in this region. I would, quite frankly, prefer to see the additional forage left for wildlife.

Finally, I am please to see that you recommended 8.8 miles of the Rio Grande River for Wild and Scenic Designation. As you well know, Colorado's efforts to designate rivers as wild and scenic are pretty weak. Like many others, I would like to ask that you

4 strongly consider extending your recommendation to include 12.3 additional upstream miles.

Again, I am grateful for your recommendations and ask that you consider these additions.

Sincerely yours,

Dan Chiras

Daniel D. Chiras, Ph.D.

7652 Gartner Road * Evergreen, CO 80439 * 303/670-3711

3775 South Grant Street · Englewood, Colorado 80110 · (303) 761-0776

Nov. 17, 1989

Dave Taliaferro
RMP Team Leader
BLM - Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Dear Dave:

This letter is regarding the draft Resource Management Plan and EIS for the San Luis Valley. I would like to thank you for recommending

20-1 the eight ACECs sited but request that you add the Elephant Rocks area to the list. I would also like to request that you prohibit

20-2 any and all mineral leasing, mineral entry and ORV use within the ACECs. I am concerned about the livestock grazing issue and

20-3 would prefer to see any forage created by range improvements being dedicated to wildlife pursuits rather than livestock. I am against construction of the Taos powerline slated to run through the Rio Grande Corridor

20-4 and would like to see an extension of the

Rio Grande River's Wild and Scenic status to include the 12.3 miles north to the Lasauces Cemetery.

Thank you for considering my comments.

Sincerely,
Babs Schmitz, Conservation Chair
Western Slope Group,
Colorado Mountain Club

[illegible]

Thank you for the many positive recommendations for protection of unique and sensitive land and water resources, as found in your draft Resource Management Plan.

I have visited several of the areas you recommend for designation as Areas of Critical Environmental Concern (ACEC). I agree that these deserve protection. I feel that these areas must be closed to off road vehicle use and to powerline construction — uses definitely incompatible with the designation.

21-1

Also, your wild and scenic river recommendation needs to be expanded to include the full variety of terrain and geologic features of the river. Specifically please include the additional 12.3 miles north of your current draft recommendation.

21-2

Thank you.

Steve Smith
63 - 11th Road
Glenwood Springs
Colorado 81601

22

Bureau of Land Management — NOV. 12, 1989

I am writing to thank you recommending eight areas of critical environmental concern.

I would like to see you add Elephant Rocks to the list as well because of its unique formation and its historical significance. I also insist that the BLM prohibit all mineral leasing on these areas.

22-1

22-2

I would also like to suggest that any forage created by range improvements be dedicated to wilderness instead of livestock. I am completely opposed to the plan permitting utility companies to construct the Taos powerline. This powerline is not compatible with protecting the natural qualities of the area.

22-3

22-4

I also feel very strongly about the idea of designating the other 12.3 miles of the Rio Grande River for wild and scenic designation. This river is beautiful, with a dense raptor population and unique recreational opportunities.

22-5

Thank you for your time. I urge you to strongly consider these suggestions.

-Michelle Mathews
Colorado College
Colorado Springs, Co

2251 South Zang Court
Lakewood, Colorado 80228
11-14-89

Dave Taliaferro
RMP Team Leader
BLM Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Dear Mr. Taliaferro:

After reviewing the Bureau of Land Management's draft Resource Management Plan and Environmental Impact Statement for the San Luis Valley area, I have identified several inadequacies in the draft which I am asking you to correct.

I applaud your recommendation of eight Areas of Critical Environmental Concern (ACEC). However, the BLM neglected to include Elephant Rocks to its list of ACECs. Elephant Rocks, located north of Del Norte, is unique in its rock formations and is home to many species of rare plants. In addition, the area is of historical importance. Please add Elephant Rocks to the list of ACECs.

23-1

Although ACECs have been recommended by the BLM, they will not be adequately protected from incompatible uses. It is imperative that mineral leasing, mineral entry, and off-road vehicle use within ACECs be prohibited.

23-2

Rather than increase the number of livestock, as recommended in the RMP, I would recommend that any forage created by range improvements be dedicated to wildlife instead of livestock.

23-3

Finally, while it is laudable that the BLM has recommended 8.8 miles of the Rio Grande River for Wild and Scenic Designation, I recommend that they extend the designation an additional 12.3 miles north to the Lasauces Cemetery, as this portion has equally outstanding characteristics.

23-4

I am confident that you will represent my concerns regarding the RMP and make changes appropriately.

Sincerely,
John B. Czarnecki
John B. Czarnecki, Ph.D.

Dave Taliaferro
RMP Teamleader
BLM - Canon City District Office
P.O. box 1171
Canon City, Co 81212

Nov. 12, 1989

Dear Dave -

I am a citizen of Colorado and have lived on both the Western and Eastern slopes for over 20 years. I feel that keeping Colorado's incredibly beautiful lands intact should be a main concern of this state, because this beauty is what brings people to our state. I want to thank you for initiating the protection of these lands by recommending the eight ACECs, Sand Castle Wilderness Study Area, San Luis Hills WSA, Blanca Wildlife Area, Rio Grande Corridor, Trickle Mtn. Area Ford Creek, Cumbres and Toltec Railroad Corridor, Los Mogotes and Flat Top Area in your draft Resourse Management

Plan and EIS for the San Luis Valley. The protection of these lands should not stop at just a designation. An area of critical environmental concern means to me an area that should be kept as beautiful and intact as when we find them. These areas to be
24-1 adequately protected cannot handle mineral leasing, mineral entry and off-road vehicles!

Two more specific uses that should be prohibited in order to fully protect these critical areas are grazing
24-2 and the Powerline Project planned to run through the Rio Grande Corridor to Flat Top Area and Piñon Hills WSA. If these
24-3 areas should be used for wildlife grazing instead of livestock. The aesthetic and spiritual values

of the areas demand this. Also the Tacs powerline is an complete disregard to the fact that the areas it will be running through have been designated as ACECs. It seems absurd to designate a place as scenic and wild and then to run a power line through them. Please reconsider this plan.

Last but not least, I feel that
24-4 the Rio Grande designation should be further 12.3 miles north to the Hasanees Cemetery. This stretch of river has an abundance of the values that we use to designate such areas, brush vegetation, waterfowl, raptors and wildlife. It is also a unique opportunity for outstanding recreational uses such as birdwatching (eagles!), rafting, hiking and camping. Why not include such an opportunity in

your plans?

Please consider these concerns in your final draft of the RMP.

Sincerely a concerned member of the environmental community,
Christine Cipriano
Christine Cipriano
906 Alpine #1
Boulder, CO 80304

2727 Manna St.
Denver Co 80205
November 11, 1989.

Mr Dale Taliaferro
RMP Team Leader

Dear Dale,

Although your plan for the San Luis Valley is very comprehensive, it does not mention Global warming. According to many Scientists, the Global warming & resulting Drought conditions will have a severe impact on our already arid west. In fact, according to a study by the United Nations, the American West is undergoing the worst Desertification of any area in the world!!!

25-1 Accordingly, I feel that a 20 year plan for BLM lands must deal with this adverse condition of Drought. One way to help would be to attempt to get our land in the best possible condition to survive Drought conditions.

25-2 I would like to see Grazing policies in all ACC's to encourage plant growth and stability. Wildlife will be greatly impeded by Drought conditions so plans must be developed to ensure the animal & bird populations have sufficient water for survival.

25-3 Off Road vehicles, mining and other destructive activities must be reduced to avoid damage to the land in sensitive areas.

Thank you for considering Global warming in your Resource Management Plans

Sincerely,

Dennis B. Williams

Margaret W. Roberts
[illegible] Forest
[illegible] Co [illegible]
November 11, 1989

Mr Dave Taliaferro, RMP Team Leader
BLM Canon City District Office
P.O. Box 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro:

I wish to express support for the BLM Resource Management Plan and EIS for the San Luis Valley.

- Thank you for recommending a portion of the Rio Grande for Wild and Scenic River designation - I recommend

26-1 you include additional upstream area to encompass the Browning Hills and "Upper Box" - another 12 miles.

26-2 The Elephant Rocks and Bishop's Rock should be added to Areas of Critical Environmental Concern.

- ORV (offroad vehicle) use should be specifically restricted from the Sand Castle

26-3 Wilderness Study Area. The archeological excavation area in particular needs this protection.

Sincerely,
Margaret Roberts

6538 E. Whelan Pl.
Denver, CO 80237
November 14, 1989

Dear Sir,

I am writing to you concerning the San Luis Valley Draft RMP/EIS. I feel it is very important for all of us to look closely at the proposed management of our public lands to ensure their conservation today and for future generations.

Let me start off by thanking you for recommending 8.8 miles of the Rio Grande River for Wild and Scenic River protection. I ask that you extend the protection 12.3 miles north from the Lobatos Bridge to Lazaneas Cemetery. Both these stretches of river easily

27-1 qualify for Wild and Scenic protection and need this protection. The recreational opportunities, raptor and wildlife habitat, and free-flowing characteristics are too valuable to be lost.

You recommend 3 ACECs in the plan. I wholeheartedly support this action. I ask that two more areas receive ACEC

27-2 protection -- Elephant Rocks and Bishop Rock. ACEC protection would help ensure the survival of rare plant communities in the Elephant Rocks area and save them

27-3 destruction the petroglyphs of the Bishop Rock area. All these ACECs should be closed to all off-road vehicle use. The ACEC designation is nullified when off-road vehicles are allowed to tear up the landscape. There are plenty of areas for off-road vehicle use without allowing such use in ACECs.

27-4 Finally, I ask that you consider other routes for future power line construction than the presently permitted route that runs through the Rio Grande corridor west to Flat Top Mesa and Piñon Hills WSA. Surely there are less critical/fragile areas for the power line than the presently proposed route.

Please put my name on the mailing list for future plans. Thank you for seriously considering my comments.

Sincerely,
Todd Robertson

Han Tolle
2140 West Mile
Fort Collins CO 80521

Dave Taliaferro
RMP Team Leader
BLM Canon City Resource Office
P.O. Box 1171
Canon City, CO 81212

Dear Taliaferro:

I am writing in regards to the wilderness designation in the San Luis Valley area. I know several aspects of the plan which I would like to comment on. First I would like to urge that the river length be increased in the upper Rio Grand Corridor.

28-1

I would also like to see extreme care used in any grazing allotments.

28-2

I have seen too many BLM lands in damaged by overgrazing. Please make sure that wild life comes first.

28-3

I am also concerned about damage caused by off the road vehicle use. Unless closely controlled motorized vehicle always seem to cause an exponential amount of damage.

28-4

Hereby I am in favor of bicycle usage. I don't see how a bicycle can cause much more impact than say a nice hike. I would hope plans can be made to allow for bicycle usage where appropriate.

Sincerely yours

Han Tolle

321 Del Rey
Canon City, CO. 81212
Nov. 12, 1989

BLM-Canon City District Office
P.O. Box 1171
Canon City, CO. 81212

Dave Taliaferro:

This letter concerns the BLM draft Management Plan and Environmental Impact Statement of the San Luis Area.

I applaud your decision to have 8.8 miles of the Rio Grande River designated Wild & Scenic but I feel this designation should extend an additional 12.3 miles north to the Lasauces Cemetery. This is an area rich in raptors and needs close supervision to insure continued raptor habitation.

You have recommended 8 ACEC's in your report and that is wonderful but Elephant Rocks and Bishops Rocks need to be added to the ACEC list for their unique characteristics. ACEC designation should include prohibition of any and all mineral leasing, mineral entry or ORV use.

The forage increase that will come with range improvements should be dedicated to wildlife, not livestock.

I protest the Tesa powerline plan that would allow the powerline to cross the designated ACEC's in the plan. This is not compatible with protecting the natural & scenic qualities of the areas.

Thank you for your consideration.

Sincerely,
Yvonne Mohr

321 Del Rey
Canon City, CO 81212
November 12, 1989

Mr. Dave Taliaferro
RMP Team Leader
BLM - Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Dear Sir:

RE - San Luis Resource Management Plan

The BLM is to be commended for its action of designating eight (8) areas of critical environmental concern. There are some inadequacies in the plan that need to be addressed.

30-1 Elephant Rocks and Bishops Rock should be added to your list of ACEC's. Both are unique areas that provide homes to many species of rare plants.

30-2 None of the areas are adequately protected from incompatible uses. The BLM should prohibit any and all mineral leasing, mineral entry and off-road vehicle use within the ACEC's. I am particularly concerned with ORV's in the Sand Castle Wilderness Study Area.

30-3 I would like to see an increase in the amount of grazing land dedicated to wildlife from the proposed 60-40 split.

30-4 The BLM should also look at alternative routes through the Rio Grande Corridor west to Flat Top Mesa and Piñon Hills WSA.

30-5 Finally, Wild and Scenic Designation of the Rio Grande River should be extended 12.3 miles north from the Lobatos Bridge to the Lasauces Cemetery. This portion has equally outstanding habitat characteristics and recreational opportunities.

Thank you for your consideration.

Sincerely yours,
Bruce Mohr

17144 E. Brown Circle
Aurora, Colorado 80013
November 12, 1989

Dave Taliaferro
RMP Team Leader
BLM - Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Dear People:

31-1 Thank you for recommending 8 ACEC's in the San Luis Resource Area. It is critical that these areas be given protection by prohibiting mineral leasing and entry and off-road vehicle (ORV) use within the ACEC's.

31-2 It is also important that the Elephant Rocks and Bishop Rocks areas be included as ACEC's.

31-3 I request that 12.3 miles of the Rio Grande River be added to the BLM-recommended Wild and Scenic section of 8.8 miles. This 12.3-mile section would extend to the Lasauses Cemetery to the north.

31-4 Please allocate at least 10% of any range improvement to wildlife. Ranchers in the U.S. are already having a hard time making a living because of excessive beef production with declining beef consumption. Grazing on BLM and Forest land makes it more difficult for private-land ranchers to stay in business. Also, please

31-5 prohibit the Tess powerline to run through the Rio Grande corridor through ACEC's. Powerlines must be routed for minimal visual intrusion. Thank you

May [illegible]

32-3 am speaking about is grazing. I suggest that you dedicate your efforts on range improvements to wildlife instead of livestock. We need to save some of our land for the wildlife of Colorado which makes our state so special and wonderful. Grazing is such an important issue! Please help in trying to save what's left of our ecosystems, they can be ever so fragile.

Sincerely

Amy [illegible]

November 12, 1989
Amy Scintich
Permanent: 6137 S. Grape Ct
Englewood, CO 8[illegible]
Present: Worner Box 452
Colorado College
402 N. Cascade
Colo Spgs, CO 8[illegible]

Dear Dave Taliaferro,

I want to begin by thanking you for recommending the eight Areas of Critical Environmental Concern. I

32-1 hope when protecting these areas you are sure to prohibit any and all off-road vehicle use, in addition to any mineral leasing and mineral entry. It is so important that we begin to preserve our wilderness before it is too late. These areas are too unique and special to be destroyed. For example, the Sand Castle Wilderness Study Area is a major archaeological excavation site in which the Smithsonian has used. Please concentrate on no off-road vehicle use in this area! I'm so happy to see you have recommended the Blanca Wildlife Area, a very important area for waterfowl nesting and habitat

32-2 site. Another place you recommended, Rio Grande Corridor, is also a wonderful area for wildlife, more specifically the riparian habitat and I plead that you seriously consider extending the area 12.3 more miles. Once again, I could go on about the importance of the other areas but I'm sure you are aware of their uniqueness.

Lastly, I would like to end with a word and plea of caution to the BLM. The subject I

Heather Schaal
1931 Lindenridge dr
Fort Collins Co 80524

Dave Taliaferro
RMP Team Leader
BLM-Canon City District office
P.O. Box 1171
Canon City, CO. 81212

33-1 I urge the BLM to include Elephant Rocks north of Del Norte to its list of areas designated as Critical environmental concern. I also

33-2 support the recommendation by the CEC of wild and scenic designation of an additional 12.3 miles of the Rio Grande River north to the Lasauses cemetery. I believe these areas are valuable additions to a commendable Resource management plan & EIS for the San Luis Valley. I also believe that it

33-3 is essential to protect these sensitive areas from off Road motor vehicle use and construction of Powerlines. I hope that some alternatives can be reached.

Thank you

Heather Schaal

34

3rd Fort Street
Fort Collins, CO
80525

Dave Taliaferro
RMP Team Leader
BLM-Canon City District Office
P.O. Box 1131
Canon City, CO 81212

Dear Dave,

I would like to applaud BLM for the lead they have taken in Wilderness Management. Your great showing at the 25th Annivs. Wilderness Conference in MN, and your cooperative effort on the Wilderness Mgt. Correspondence Course being developed at CSU are outstanding examples of the agency's effort.

It has been brought to my attention that there are some conservation concerns in the San
34-1 Luis Valley. I would like to see the Elephant Rock and Bishop Rock areas under Area of Critical Concern Designation. I also have floated the Rio Grande and feel that the 8.8 mile
34-2 segment should extend up to the Upper Box Canyon so it would equal 12 miles.

34

34-3 The Heuritha Project which has gained permit through the Rio Grande corridor west to Flat Tops Mesa and Piñon Hills WSA should be moved out of the area where Wild & Scenic or ACEC areas are proposed.

On the subject of grazing allotments I am very happy to know that you are looking at the Resource area as a whole. I realize your plan includes a multiple use management plan. My only suggestion is to use a
34-4 system similar to Levels of Acceptable Change to maintain the range in an excellent-good condition, this is usually the optimal level for all users.

Thanks for the good work and keep it up! My only other suggestion is for you to suggest to the environmentalists that they may help in your management efforts by contributing in some manner. I know BLM has more land than manpower and it becomes extremely difficult to maintain and patrol these vast tracts of land.

Sincerely,
Kirsten Ingebrigtsen
CSU
Recreation Resources Mgt.
Masters Candidate

35

DAVE TALIAFERRO
RMP TEAM LEADER
BLM, CANON CITY DISTRICT OFFICE

DEAR DAVE;

HERE I SIT AT THE COLORADO ENVIRONMENTAL COALITION (C.E.C) CONFERENCE IN CANON CITY AS KIRK KOEPSEL INFORMS THE AUDIENCE TO WRITE A LETTER TO YOU AND GOES SO FAR AS TO INFORM US WHAT WE SHOULD WRITE. I DON'T OPERATE IN THIS MANNER AND AM NOT A SUPPORTER OF KIRK KOEPSEL, AS HE IS THE MOST ANTHROPOCENTRIC, HYPOCRITICAL "ENVIRONMENTALIST" THAT I HAVE EVER LISTENED TO. I DO NOT BELIEVE THAT AN ENVIRONMENTALIST CAN APPROACH AN ISSUE WITH AS SELFISH A BIAS AS THOSE HE OPPOSES.

HOWEVER, I AM A STROUG ADVOCATE OF ALL NATURAL AREAS. I DO NOT PLACE MY INDIVIDUAL PREFERENCES OVER THOSE OF OTHER FELLOW HUMANS, UNLESS THEIR ACTIONS WILL DIRECTLY ALTER AND INTERFERE WITH THE NATURAL PROCESS OF THE ENVIRONMENT. WE MUST BORROW SOME RESOURCES FROM THE EARTH IN ORDER TO SURVIVE BUT MUST REMEMBER THAT OUR ESSENCE IS FROM OUR EARTH AND OUR SPIRIT IS COMES FROM OUR WILDNESS.

PLEASE, MAKE DECISIONS WHERE YOU HAVE STUDIED
ALL THE CONSEQUENCES THAT COULD RESULT. I URGE YOU
1 TO DESIGNATE THE ADDITIONAL 12.3 MILES OF STREAM TO
THE NORTH OF LASAUCES CEMETARY AND TO CONSIDER
2 DESIGNATING ANY ADDITIONAL FORAGE, THAT IS CREATED
THROUGH MGMT. ACTIONS, FOR WILDLIFE USE. I URGE YOU
TO STRIVE FOR ADDITIONAL PRESERVATION OF NATURAL AREAS, NOT SOLELY
FOR HUMAN USE AND ENJOYMENT BUT FOR THE BENEFIT OF
ALL ORGANISMS THAT MUST LEARN TO SHARE THE EARTH.

SINCERELY,
John C. Ziegman

JOHN ZIEGMAN
402 FRANKLIN ST.
FT. COLLINS CO. 80521

Dave Taliaferro
BLM Team Leader
BLM-Canon City District Office
P.O. Box 1131
San Luis Resource Mgmt Plan: More Concerns To Be Interested:

36

Judith E. Roccio
612 S. Stover #5
Ft Collins, CO 80524
Colorado State University
Earth Resources Dept.

11-12-89

To Whom it May Concern,

I would like to commend the BLM for their work and commital to propose the current 8 ACEC's in the San Luis Valley. It is encouraging that these areas are considered significant enough to be protected as wilderness or wild and scenic river status.

There are a few concerns that I would like to mention regarding the current Resource Mgmt Plan: with respect to the Rio Grande River Wild & Scenic
36-1 designation the BLM has recommended 8.8 miles of the river. There are an additional 12.3 miles north of the designated area which are of great scenic beauty that I believe should be included. The "Upper Box" area of the river is an example of the spectacular volcanic cliff canyons that are unique to this part of the Rio Grande.

A major concern regarding the Sand Castle Wilderness Study area, is that there is not a concerted effort to keep off-road vehicles off the
36-2 study area. The damage done to this delicate ecosystem by off road vehicles is irreversable in the short term. Please consider enforcing the prohibition of off-road vehicle use in this area, and all ACEC study areas.

Please consider adding the Elephant Rocks unique geologic area on the
36-3 ACEC list. This is a beautiful and interesting area geologically. A well known Photo point, "Bishop Rock" is located in the Elephant Rock area. Bishop Rock looks remarkably like a bishop pointing in the direction of peace and hope.

Finally, there is an existing Power Line corridor permit which provides the potential for a high voltage power line through or
36-4 near two of the proposed ACEC's. Please be sure to deal with Moving this corridor permit area far enough away from the ACEC's as is needed so there is no visual impact.

Thank-You,
Judith E. Roccio

37

Norman J. Mullen
732 Grant
Louisville, Colo 80027

Nov 12, 1989

Dave Taliaferro
RMP Team Leader
BLM-Canon City District
P.O. Box 1171
Canon City Colo. 81212

Dear Sir:

I am writing to comment on the Draft RMP + EIS for the San Luis Valley.

I support the 8 ACECs BLM has identified.

37-1 I also support ACEC status for Elephant Rocks.

I have visited the Smithsonian dig at Sand Castle, and heard the assistant head archeologist state that ORV use disturbed the

37-2 archeological values of the area. Please prohibit ORV use in Sand Castle and all ACECs.

Wild + Scenic

I support the recommendation of 7

37-3 Rio Grande for Wild + Scenic. I suppo an additional 12.3 miles for protection, f Lasauces Cemetery to the New Mexico b

I have hiked part of the canyon, and wo like to run the river.

37-4 I believe all forage increases should be allocated to wil

37-5 I support wilderness protection for Luis Hills and Flat Top

37-6 I have hiked Trickle Mountain, and be it warrants ACEC protection.

Thank you for your consideration o comments.

Sincerely,
Norman J. Mullen

38

12 November 1989
1201 Adams St.
Denver, Co 80206-3417

Mr. Dave Taliaferro
RMP Team Leader
BLM- Canon City District Office
P.O. Box 1171
Canon City, Co. 81212

Dear Mr. Taliaferro:

It has always been an embarrassment to me, that the Rio Grande in New Mexico has received Wild + Scenic River protection, and does not have that protection in

38-1 Colorado. The portion from the Los ances Cemetery to the state line should be recommended in your management plan.

I believe you should also add to your Resource Management

38-2 Plan, the Elephant Rocks area as an area of critical environmental concern.

It seems clear to me, that you are attempting to blance current resource value, with long range protection of the public interest. For this I applaud you.

Sincerely,
Don Thompson

12 November 1989

To the BLM:

I believe in the designation of the 12 acres of For Wilderness. The 8 ACECs are import

39-1 toward preserving important resources fo Future. I believe Elephant Rocks + Bishop Should also be a part of this proposal.

39-2 The Taos powerline should not go dire through the Rio Grande Corridor. Lanscape this powerline through another, less pri area would be more acceptable for public concerns.

39-3 As a wildlife biologist, I believe th range improvements on BLM lands should b the wildlife. Increasing WFUDS is least as important as increasing AU

39-4 Your management is critical to the wildlife, especially during lambing, fo calving periods. Set policies about l use during these critical periods bef they become a problem.

Thank you.

Michael Goldstein
725 Foster St
Fort Collins CO 80
303 490 1580

Kirk Cunningham 40
1842 Canyon Blvd, #24
Boulder, Co. 80302
11/12/89

e Taliaferro
M Team Leader
-Canon City District
Box 1171
on City, Co, 81212

lemen,
This letter on the San Luis RMP draft supplements my oral
ents made at the Denver hearing.
I would like to support the agency's proposed ACEC designations:
he Sand Castle WSA (although it should be considered as wilderness
not monitors an ACEC), San Luis Hills WSA (ditto above), Blanca
Wildlife Area (for its wetland habitat values), the Rio Grande
orridor (for raptor habitat and recreational values), Trickle Mtn/
ood Creek area (for wildlife, - plant and animals, - and recreational
alues), the Cumbres and Toltec Railroad Corridor, Los Mogotes
r winter range & rare plants), and the Flat Top area (for scenic
d wild qualities). To the extent that these designations depend
disperse non-motorized recreation values or surface resources
e rare plants, habitat, and riparian, highly destructive uses like
travel must either be banned altogether, or severely restricted
xisting trails. I'm particularly concerned about power line proposals
ugh these areas.
azing is an important public land use in the San Luis RA, but
m concerned about grazing impacts on riparian and wildlife and
BLM's proposed increase in AUM's. Before AUM's are increased, I
uld like to see the quality of management increased, in
articular in regards to riparian areas. Recent developments
non-point source regulations of the Clean Water Act make it
e important that BLM examine its allotment management (w.)

plans to prevent overgrazing, seasonal-long occupation of riparian
zones by livestock. The BLM should examine the BLM's
fencing and livestock management practices used by the Agency in
Cowgan (vs East Pickering), for use in the RA. 40

Sincerely,
Kirk Cunningham

November 12, 1989
Linda Batlin 41
650 Tantra Dr.
Boulder, CO 80303

ave Taliaferro
MP Team Leader
M-Canon City District Office
. Box 1171
nyon City, CO 81212

ar Mr. Taliaferro:
I would like to provide a few comments on
he Resource Management Plan and Environmental
Impact Statement for the San Luis Valley.
First I would like to thank you for recommending
ACECs in various sensitive areas of the resource
ea. However, I would like to see the BLM
Elephant Rocks to its list of ACECs because
its unique formation and it is home to ~~many~~ many
pecies of rare plants.
I commend you for recommending 8.8 miles of
e Rio Grande River for Wild and Scenic designation.
I recommend that you extend the designation an
ditional 12.3 miles to the Lasauces Cemetery
This portion has equally outstanding characteristics.
Thank you for the opportunity to comment.

Sincerely,
Linda Batlin

220 W. 15th #709
Pueblo, CO 81003
Nov. 13, 1989 42

Mr Dave Taliaferro
BLM - Canon City District
Box 1171
Canon City, CO 81212

Gentlemen:

I write in support of Wild & Scenic designation
42-1 for about 21 mi. of the Rio Grande - from the N. Mex.
border north. You are to be commended for proposing the
8.8 mi. Great! But the additional 12 mi should be added.
I know it from rafting there.

Likewise, I want to commend you for recom-
mending, designating 8 areas as ACEC's.
I know some of them from my years in the
Valley. But why not add Elephant
42-2 Rocks to the list? It is certainly spec-
tacular... and Bishop Rock.

When I lived in Alamosa I questioned
the need for and the route for the Taos
42-3 intertie powerline. But if it is to be, it
certainly should be put where it does the
damage to the wildlife & scenic values
of the Valley.

One concern is ORV use in public lands.
42-4 There has to be some permitted use, but there
should also be prohibited areas which are
observed. The same for Mineral entry. The ACEC's
are obvious areas for protection.

42

Thanks for your consideration and for the great amount of leadership you already show.

Sincerely
John McWade

Dec 5, 1994

Dear Mr. Taliaferro,

I commend the BLM for its draft Resource Management Plan for the San Luis Valley and would like to encourage you to consider several additions I think for inclusion in this Plan.

A. It shows great foresight to include 8.8 miles of the Rio Grande for wild & scenic designation. I would encourage you to also consider an additional 12.3 miles north of the proposed area for w.s. designation. This area also supports a significant sport fishery, population & has excellent recreational opportunities. Recreational use of this area is likely to have less impact on wildlife habitat than the narrower downstream areas.

43-1

B. Include the Elephant Rocks area north of Del Norte on the ACEC list. This area has significant historical & ho attributes.

43-2

C. Provide an adequate protection plan for the ACEC's including prohibiting ORV & mineral leasing in these areas.

43-3

D. In these areas, limit or eliminate livestock grazing.

43-4

Thank you for your consideration of these issues.

Mary L. Poire

44

Dec. 5, 1994

Eric J. Nichol
151 Wind #2
Colspgs, CO 80907

Lee Taliaferro
RMP Team Leader
BLM - Canon City District Office
P.O. Box 1171
Canon City, CO

Mr. Taliaferro,

I have some comments for you regarding the Resource Management Plan for the San Luis Valley. Your ACEC framework and Rio Grande Wild and Scenic Rivers designation are both good first steps, and the BLM merits a successful agency evaluation for these recommendations.

However, in general, your policies are not restrictive enough. First, BLM ~~co~~ should seek to restore populations of wildlife by dedicating MORE than 60% of new forage to non-cattle consumption. Also, ORV and mineral exploration permission for any ACEC must be rescinded. And alternatives to the Saguache powerline, directed especially to placing it outside any ACEC, should deserve more of your attention.

Finally, I have special feelings for the Rio Grande, and I insist that you extend the WSR segment 12.3 miles north to the Lasauces Cemetery!

44-1

44-2

44-3

44-4

44

Thank you for your consideration of my ~~op~~ input.

Sincerely,
Eric J. Nichol

45

11/12/89
Box 1217
Crested Butte CO 81224

Dear Dave,
I'm glad BLM has a good line-up of ACEC's in the new San Luis draft RMP/EIS. I support this list. However, your management plan has inadequate protections. The
45-1 Allowance of OHV's & mining completely contradicts the purpose of an ACEC. You must ban mining & motor vehicles from ACECs. You also should keep cattle grazing minimal there.
One reason we fuck so hard for wilderness is that BLM, USFS, NPS, etc don't protect lands adequately. If you want to stem the pressure for more wilds, you should do a better job with other land categories, like ACECs.
more

45

Grazing: Don't go forth with any AUM increase until you have completed & demonstrated significant forage improvements throughout the San Luis District.
45-2 BLM has admitted in a regional study that its grazing lands within CO are largely in poor condition. No grazing increase until this problem is corrected!

Rio Grande - I support your Wild & Scenic recommendation & ask for an additional 12.3 miles north to Jesuvias Cemetery.
45-3 Water rights for this area should be ignored by BLM for now. Leave that problem for Congress. Meanwhile, go ahead & recommend Wild & Scenic.
Thanks.
Gary Sprung

46

Dear Mr. Tallaferro

I believe that the proposed land should be turned into national wilderness area. But you should let the ranchers keep there animals for grazing. The live stock aren't going to eat all the refuge. So in
6-1 closing let's keep the wilderness live & the live stock in.

thank you for your time

Boy Scout troop 471

Jesse Ross (life)
Luke Ross (first class)
Tom Eyre [Eagle scout]

47

10570 W. 70th Place
Arvada, CO 80004
November 12, 1989

Dave Tallaferro
RMP Team Leader
BLM - Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Dear Dave,

I am concerned about the future of BLM lands in the San Luis Valley. These areas are most valuable in their natural state, both for Colorado's tourist industry and for the excellent natural habitats they provide (antelope in Las Mogotes and Raptors on the Rio Grande).

47-1 For this reason I urge you to prohibit mineral development, off-road vehicle use, increased grazing, and any powerline projects that would destroy the rugged and beautiful BLM's

Sincerely,
Jon H Fairchild
Jon H. Fairchild

Dave Taliaferro
RMP Team Leader
BLM-Canon City District Office
P.O. box 1171
Canon City, Co. 81212

As an 18 year resident to the beautiful State of Colorado, I will understand the increasing need to protect our fast-dwindling wild lands from human and commercial development. After all, the very wildness of Colorado is more than just a source of inspiration for those who live here - more than the preservation of pristine environment for its intrinsic values - it is the bread and butter of Colorado's economy. I would like very

much to thank you at the BLM for for recommending 7 ACEC's in different areas of the San Luis Valley.

I would, however, recommend if not plead, that while these sensitive areas are being studied for ~~[illegible]~~ designation,

48-1 you prohibit all mineral leasing, mineral entry, and off road vehicle use within the ACEC's.

I understand that the BLM plans to greatly increase the number of livestock on its lands.

48-2 As a citizen and a taxpayer, I know I am not alone in finding current policy appalling. Please consider matching these increases with a dedication of new forage lands

not suggesting great sacrifices for anyone. We are on the same side, the two of us. It is, of course, you who has to take flak from both sides of these issues and somehow seem reasonable to both. But I feel it is the duty, if not the privilege, of leaders like yourself, to make competent long term decisions which might draw fire from the business community or even your supervisors.

Thank you for your time and consideration,

Brennan Lindsley

Brennan Lindsley
2111 4th St., Boulder, CO
80302

to foraging by wildlife.

48-3 The 7.8 miles of the Rio Grand River which the BLM has recommended as wild and scenic is beautiful, but certainly is not nearly enough. An area extending north to the Lasauces Cemetery for nearly 13 miles is rich in vegetation, waterfowl, and other wildlife especially dense raptor populations. The area offers unique opportunities in river rafting, hiking, and birdwatching. It would be a shame to see these areas damaged due to irresponsible management.

After all, we are

November 12, 1989

Dear Tuhafero
RMP Team Leader
BLM - Canon City District Office
P.O. Box 1199
Canon City, CO 81212

Dear Mr. Tuhafero:

I'm writing to you in regards to your RMP & EIS for the San Luis Valley.

First I thank you for recommending 8 ACECS in this area. These areas, as you are aware contain very special areas for waterfowl, antelopes and special sensitive plants.

However I ask that you take two other things into consideration also.

1) That you include the Elephant Rocks area to your list of ACECS. My main concern in regard to this is that this area is home to many species of rare plants.

2) The BLM consideration to substantially increase the number of livestock on its land. Can you, instead, dedicate any forage created by range improvements to wildlife instead of livestock.

Thank you for consideration of these matters.

Sincerely,

Linda M. Lee
10758 Lewis Circle
Westminster, CO 80021

November 12

Dear Mr. Tuhaferos,

About 6 years ago I took a raft trip down the Rio Grande and it still sticks in my mind as one of the most people-free places I've enjoyed. The quiet simplicity did much to rejuvenate my soul (as well as start a romance!)

The geology was spectacular and I remember many visions of raptors along the cliffs.

50-1 Please designate the remaining 12.3 miles as wild and scenic (while it still is) and establish the maximum protection from grazing.

Thank you for your time.

Jill Friedman
Park Ranger
President Fossil Sub

Dear Dave,

I attended the Colorado Environmental Coalition Wilderness Conference in Canon City and was made aware of the ACEC designated areas. I am a supporter of Wilderness and have a strong interest in the San Luis Valley. I would like these areas to also be closed to off-road vehicle use. Also I would like further information from the BLM on this issue.

51-1

Thank you,
Lynn Schuler
912 E. Prospect
Ft. Collins, CO 80523

52

Sandy Neuberg
Boyd Gulch,
Rowdie Canyon Rd.
Bellvue, Colorado 80512
November 12, 1989

Dave Taliaferro
WMP Teamleader
BLM : Canon City

Dear Dave –

My attention has recently been brought to the BLM's Resource Management Plan and EIS for the San Luis Valley. I am gratified that 8 ACECs have been designated. I would like to express some concerns in connection with this.

52-1 I consider it imperative that all off road vehicle access and mineral mining/leasing of any kind be prohibited in the ACECs. I also oppose livestock grazing in the ACECs — any grazing within the ACECs should be dedicated solely to wildlife.

52-2 I also oppose construction of the Taos power line through the Rio Grande Corridor to the Flat Top Mtn + Pinon Hills WSA.

52-3 I would also urge you to consider inclusion of the Elephant Rocks area as an ACEC and to

52-4 consider addition of the 12.3 miles of the Rio Grande from the Lobatos Bridge to the Lasauces Cemetery to the Wild + Scenic recommendation.

Thanks for your good work + for your consideration –

Dave Taliaferro
WMP Team Leader
BLM-Canon City Dist Office
PO Box 1171
Canon City, Co 81212

Nov. 12, 1989

Dear Sir:

I would like to congratulate you for your draft Resource Mangt. plan and Environmental Impact Statement for the San Luis Valley. However there are a few areas where additional protection of these areas could be provided.

53-1 First I would recommend extending the 8.8 mile Rio Grande Wild & Scenic designation upstream for another 12.3 miles north to the Lasauces Cemetery as this stretch has equally scenic characteristics.

53-2 Also concerning ACECs the Sand Castle WSA should receive immediate protection from off-road vehicles to stop the impact on the fragile archaeological resources area.

53-3 Also concerning grazing I would encourage reduction of the cattle ratio to wildlife ratio from present ratio of 90% to 6%. Now grazing practices should be altered totally to wildlife increased grazing capacity.

Sincerely,
Scott Sela

54

P.O. Box 45
Pitkin, CO 81241

Nov. 12, 1989

Dave Taliaferro
RMP Team Leader
BLM-Canon City Dist. Office
P.O. Box 1171
Canon City, CO 81212

Dear Dave,

I have just seen a series of slides on the Rio Grande Lower area. I feel we

54-1 should protect and preserve the additional 12.3 miles along with the 8.8 miles already recommended. I was impressed with the pristine beauty of the wonderful Rio Grande in this area. It must be saved! Help us! Let's not destroy the rich riparian habitat and lush vegetation.

On "Grazing", I'd like to write an incident encountered this past spring in Utah. I'd hate to see grazing out of hand in Colorado as it is in Utah. While hiking for 4 days in cow pies along the Escalante River Canyon, I was left with

54-2 a total disgust of these animals. Please keep the cows out of my hiking & camping areas, it can be done. Grazing is quite stable in Colorado and the cattle are there. There are areas for us enjoy. We like to walk on the green grass, not cow pies! Keep Colorado green, don't let what happened to Utah happen here.

Hope you'll consider these two suggestions. Thank you.

Sincerely,
Kathy Cop

55

Roger Cox
Box 45
Pitkin, Co 81241

December 12, 1989

Mr. Dave Taliaferro
Res. Mgmt. Plan Team Leader
BLM - Canon City Dist
Box 1171
Canon City, Co 81212

Greetings:

I wish to comment on your current draft plan for the San Luis Valley:

① Your recommendation to include the Rio Grande River into the WILD + SCENIC DESIGNATION is a good one!

-1 But 8.8 miles is inadequate. The 12.3 miles upstream from the bridge is also beautiful and needs protection as well.

-2 ② Please add the Elephant + Bishop Rock areas to your list of ACEC's. It is also important that

3 off-road vehicles be kept out of the areas to prevent environmental damage.

-4 ③ The proposed TMS powerline needs to be relocated out of the Rio Grande corridor.

5 ④ The AWRI proposal project very destroy the Blanca Wildlife ACEC. - BLM must stop the AWRI!

over

55

55-6 ⑤ More emphasis must be placed on wildlife habitat improvement and less on livestock grazing than currently in the RMP.

⑥ Please put me on your mailing list for updates on this situation.

Sincerely,

Roger Cox

11/12/89

CARMEN BLUMBERG
223 E. PLUM
FT. COLLINS, CO
80524

56

DEAR DAVE TALIAFERRO;

I'M A WILDLIFE BIOLOGY SENIOR AT COLORADO STATE UNIVERSITY. I'M WAITING TO EXPRESS MY VIEWS ON THE SAN LUIS VALLEY (AREAS OF CRITICAL ENVIRONMENTAL CONCERN DESIGNATIONS) ISSUE.

I AM DELIGHTED TO KNOW THAT 8 (A.C.E.C.'s) AREAS HAVE BEEN IDENTIFIED BY THE B.L.M. TO BE CRITICALLY SENSITIVE AREAS. THANK YOU!! I HOPE THAT IN THESE CRITICAL AREAS, MINERAL LEASING, MINERAL ENTRY, AND MOTORIZED ACCESS ARE PROHIBITED. HAVING STUDIED ECOSYSTEMS FOR 3.5 YRS, I KNOW THE DAMAGE THESE IMPACTS CAN CAUSE IN NATURAL AREAS. I ALSO PROPOSE THAT YOU PROHIBIT GRAZING IN THESE AREAS. I HAVE WORKED FOR THE FOREST SERVICE FOR 2 YRS. AND I HAVE SEEN HOW UNCONTROLLABLE THIS PRACTICE CAN BE. THE RESULT IS IMPACTS TO SOIL, WATER, AND WILDLIFE. I KNOW IT'S NOT EASY TO JUST SAY NO! I URGE YOU TO PLEASE CONSIDER MY STATEMENTS.

SINCE THE 8 AREAS ARE PROPOSED TO BE A.C.E.C.'s, I AM AGAINST THE PLAN THAT PERMITS UTILITY CO.'s TO CONSTRUCT POWERLINES (eg. TAOS POWERLINE) IN THESE AREAS. THIS FURTHER IMPACTS ECOSYSTEMS.

LASTLY, I PROPOSE THAT THE BLM EXTENDS THE DESIGNATED A.C.E.C.'s. I PROPOSE AN ADDITIONAL 12.3 MILES NORTH TO THE LASAUCES CEMETERY. THIS AREA HAS MUCH ECOSYSTEM + PEOPLE VALUE - JUST LIKE THE 8 OTHER AREAS! I THANK YOU! HAVE A NICE DAY!

Carmen A. Blumberg

57

Dave:

The San Luis Valley area has great personal cultural & historical significance to me. My ancestors helped pioneer commercial trade farming in the valley. The area known for its scenic, aesthetic, & wildlife values to others has special spiritual value to me. Like all valley residents, the valley is a large part of who we are.

I appreciate your efforts to protect the areas you have proposed for Areas of Critical Environmental Concern, & Wild & Scenic Designation.

57-1 I further ask that you also consider the Elephant & Bishop Rocks for ACEC designation, and Wild & Scenic designation for the Rio Grande up to the Lasauces Cemetery.

57-2

Thankyou.

Sincerely, Nate Lunger

P.S. I have been closely watching the BLM the past few years & have been decidedly encouraged by the new direction the BLM is taking. You have won a new constituent. Keep up the good work & show the NPS & USFS how to do!

Nov 12th 89 58

BLM - Canon City District Office
P.O. Box 1199
Canon City, CO 81212

Dear: Dave Taliaferro,

58-1 It is extremely important to me that the 8 BLM ACEC's be included and protected as wilderness.

As a native of Colorado, living in Denver & Salida, the uniqueness and quality of these beautiful areas are important to me. I enjoy some of the many activities associated with these beautiful areas (easy access, water, hunting, photography, species habitats) and so believe

58-2 that these areas — as a minimum — be designated. Provisions should include off-road vehicle use, mining, leasing, & grazing developments.

Thank you for considering this issue.

Sincerely,
Jim Stephenson
ACSU Student &
Peace Corps Representative

Nov, 12 1989
P.O. Box 1109
Ouray, Co 81323

Dave Taliaferro
RMP Team Leader
BLM - Cañon City District Office

Dear Dave;

I'm writing to you to ask for additional c
to your recently released RMP. Thank you for recogni
and recommending the 8 ACEC's and a portion of the
River for Wild & Scenic designation. As an ardent riv
supporter it is heartening to see progress in river prot

59-1 I recommend that you propose an additional 12.3
of the portion above the Lobatos bridge.

59-2 In addition to the 8 fine ACEC's I recommend including
Elephant rocks area and the Bishop rock area. Concern

59-3 ACEC management, please exclude off-road vehicle use, me
entry & leasing, for the sake of preserving the integrity of t
areas that lead to their special designation.

On grazing, my environmental perspective leads me to su

59-4 the 60%-40% split on allocation of additional forage deriv
management be shifted to a ratio of 80%-20% on better 100
wildlife.

59-5 Also please insist that the public service powerline be loca
in an area with less impact on the areas specially designated

Thank you for your time + consideration. Best regards
Dave Ar

60

Nov. 11, 1989

Dave Taliaferro
RMP Team Leader
BLM - Canon City District Office
P.O. Box 1199
Canon City, Co. 81212

Dear Mr. Taliaferro:

This letter is written to comment upon the draft Resource Management Plan and Environmental Impact Statement for the San Luis Valley written by the BLM. First of all, I wish to commend the BLM for its recommendation the Wild and Scenic Designation for 8.8 miles of the Rio Grande River. However, I believe the designation

60-1 should be extended northward, an additional 12.3 miles to the Lasauces Cemetery.

In addition, I wish to commend the BLM for recommending eight areas of critical environmental concern within the resource area. I do wish to state that within the plan for these areas must include the

60-2 protection that off-road vehicles not be allowed in these areas of critical environmental concern. Furthermore

60-3 I believe that Elephant Rocks be added to the ACEC listing. Lastly, I wish to disagree with BLM's

60-4 choice to use additional rangeland improvements for livestock instead of wildlife.

Thank you for the opportunity to comment upon this basically excellent plan.

Sincerely,
Bryan R. Smith, Treasurer
Boulder Chamber Society
7300 - 19th St. #605
Boulder, Co. 80304

NARD CLAAR
1651 CEDAR
CANON CITY, CO 8

11-12-89

DEAR MR. TALIAFERRO

I WISH TO THANK YOU AND OTHERS FOR DESIGNATING 8 AREAS IN THE SAN LUIS AREA AS AREAS OF CRITICAL ENVIRONMENTAL CONCERN. I ALSO WISH TO THANK THE BLM FOR DESIGNATING 8.8 MILES OF THE RIO GRANDE TO WILD & SCENIC RIVER DESIGNATION.

I WOULD ASK THAT DURING THIS COMMENT

61-1 PERIOD YOU CONSIDER THE ADDITION OF THE ELEPHANT & BISHOP ROCKS AREA TO BE INCLUDED AS A ACEC AREA. IN ADDITION THERE ARE 12.3

61-2 MILES OF THE RIO GRANDE RIVER NORTH THAT MEET CRITERIA FOR WILD & SCENIC DESIGNATION THAT WOULD BE VERY APPROPRIATE FOR CONSIDERATION PLEASE ADD THIS AREA.

61-3 PLEASE HALT THE POWERLINE PERMIT OR REROUTE. A POWERLINE DESTROYS PICTURES, THE VIEW, THE SPIRITUAL ISSUE OF SPECIAL AREAS. POWERLINES ARE OK

61-4 WHERE THERE ARE ROADS & JUNKYARDS & CITIES. DO NOT ALLOW GRAZING IN THESE AREAS. LET THE WILDLIF MAKE THEIR OWN WAY WITHOUT INCLUDE INTERFERENCE

THANK YOU FOR YOUR CONSIDERATION AND ACTION ON THESE IMPORTANT AMERICAN ISSUES

SINCERELY,

62

[illegible]
[illegible]
[illegible]
Box 1171
[illegible], Colo. 81212

Mr. Taliaferro

[illegible] I would like to [illegible] thank you for your [illegible] recommendations of the ACEC in the BLM draft resource plan. While the suggested areas are a good start, I would ask you to include Bishop Rock & Elephant Rock in addition to the other eight areas. Elephant Rock is unique in its formation and is home to many species of rare plants.

Furthermore, I strongly urge you to prohibit the use of off-road vehicles within the ACECs.

Sincerely

Jeff

P.S. Good job on the Rio Grande designation, but how about including an additional 12.3 miles north of Lasauces Cemetery.

63

Nov. 12, 1989

Dear Mr. Taliaferro,

I am so pleased the BLM is concerning itself with areas of scenic and scientific values, and of special recreational value of the non-destructive sort. It seems as though now is the last chance to designate special use protection for critical areas.

Our concern is that the areas of special wild or scenic value be large enough, not just small fragments. For this reason I would request especially that the Rio Grande be protected for wildlife and scenic designation along its entire length in the

63-1 BLM lands, especially for 12 miles upstream from the eight miles already in the BLM plan. A longer stretch makes it far more meaningful, and now, not later, is the time to do it.

63-2 Also, no power lines along this river corridor. It is too valuable a resource to mar by power lines. There have to be less damaging alternatives.

In addition I support protection for the Sand Castle Wilderness Study Area and protection for the Sand Luis Hills WSA, also the Flat Top Area, and Blanca Wildlife Area.

Please do all you can now to preserve the values that exist in your BLM lands. I am 63 years old and have watched destruction of our lands for a long time. I welcome the recognition of the need to preserve what we have left. Do all you can, please to save the best.

Sincerely

Dorothy H. Bradley
1035 Broadmoor Pl.
Colo. Spgs., Co 80904

11/10 64

Dave Taliaferro,

I think it is great the BLM has recommended the 8.8 miles of the Rio Grande River for Wild & Scenic Designation. I believe that the 8.8 miles should be extended another 12.3 miles north to the Lasauces Cemetery. Please give this your utmost consideration.

Thanks,

Jamie Kingsbury

65

Mr. E. S. Rock
3230 W. Prospect
Fort Collins Co.
80526

Dear BLM,

I wish to take this opportunity to thank you and express my support for your San Luis wilderness proposals. I feel strongly that this is an environmentally sound move for the agency and is in strong support of the quality of life in our world. I would also

65-1 like to suggest that an additional 12.3 miles upstream of your Rio Grande Corridor be extended to include important kayaker use areas. Thank you again for an opportunity to set aside important slices of our ecosystems.

Sincerely

12 NOV 89

CANON CITY COLO

DAVE TALIAFERRO,
RMP TEAM LEADER
BLM-CANON CITY DISTRICT OFFICE
PO BOX 1171
CANON CITY CO 81212

REF: SAN LUIS VALLEY DRAFT RESOURCE MANAGEMENT PLAN

DEAR DAVE,

PLEASE REGISTER MY GENERAL SUPPORT FOR THE SAN LUIS VALLEY DRAFT RESOURCE MANAGEMENT PLAN.

66-1 PLEASE CONTINUE TO SUPPORT THE PROTECTION OFFERED TO THE 8 ACRES. PLEASE CONSIDER ADDING ELEPHANT ROCKS AND BISHOP ROCK AS ADDITIONAL ACEC'S.

66-2 HOPEFULLY THE TRIOS POWERLINE CAN BE RE-ROUTED TO AVOID THESE SENSITIVE AREAS.

THANK YOU FOR RECOMMENDING 8.8 MILES OF THE RIO GRANDE (FROM LOBATOS BRIDGE TO THE NEW MEXICO BORDER). THIS STRETCH OF RIVER IS QUITE SCENIC AND A HIGHLY IMPORTANT RAPTOR AREA WHICH SHOULD BE PROTECTED. I WOULD HOPE THAT THE

66-3 12.3 MILE SEGMENT NORTH TO LASAUCES CEMETARY COULD ALSO BE INCLUDED FOR WILD + SCENIC RIVER DESIGNATION.

THANK YOU FOR YOUR CONSIDERATION.

RESPECTFULLY,

DON POTTER
1426 LOMBARD
CANON CITY, COLO 81212

Susan Elle
336 Westwood Dr
Ft. Collins, Co. 80

November 12, 1989

Dave Taliaferro
RMP Team Leader
BLM-Canon City District Office
P.O. Box 1171
Canon City, Co. 81212

Dear Dave:

I would like to thank you for recommending 8.8 miles of the Rio Grande River for wild and scenic Designation in Colorado. I feel, however, that you should extend the

67-1 designation an additional 12.3 miles north to the Lasauces Cemetery because this area has equally outstanding characteristics.

I would also like to voice my opinion on some of the management plans for this area. First of all I strongly protest against the

67-2 plan permitting utility companies to construct the Trios Powerline. This powerline would not be compatible with protecting these areas for designated ACEC's.

67-3 Secondly, I feel you should dedicate any range created by range improvements to wildlife instead of livestock.

67-4 Finally, I feel you should prohibit any mineral leasing and off-road vehicle use within the ACEC's.

Once again, I thank you for recommending the 8.8 miles for wild and scenic Designation and thank you for listening to my other concerns.

Sincerely,

Susan Elle

Nov. 12, 1989

Dear Dave Taliaferro:

I am a graduate student @ CSU in Air Resource Management, a Sierra Club Member, & I have attended the Colorado Wilderness Conference held in Canon City. I also work indirectly for the BLM on a project studying different air quality monitoring techniques appropriate to wilderness areas.

After hearing some background information on the San Luis Resource Management Plan / EIS I would like to make the following comments:

1) Thank you for taking the initiative for recommending 8.8 miles of the Rio Grande for wild & scenic designation.

68-1 2) I strongly urge the complete prohibition of ORV use within the ACEC's. I am familiar with the Sand Dunes west near Rock Springs, Wyo & have seen the damage to vegetation, wildlife habitat, & general aesthetics that ORV's cause.

68-2 3) I suggest the addition of Elephant Rocks to the list of recommended ACEC's. For its historic & cultural value alone, this area appears worthy of ACEC designation.

Thank you for considering these comments.

Sincerely,

Lucinda R Smi

69

Dave Taliaferro
BLM - CC District Office
PO Box 1171
Cañon City, CO 81212

12

Dear Sirs -

You appear to have done a good job in your San Luis Valley plan. You have included a segment of the Rio Grande for wild & scenic, and you have recommended 8 ACECs.

1 I would recommend that you extend the Rio Grande wild and scenic designation further upstream, perhaps 10-12 miles.

2 I would also recommend that you include Elephant Rock & Bishop's Rock in your ACEC list for their special qualities.

Once you have identified and designated ACECs it is important that you protect them from damaging & incompatible uses, like ORVs and disfiguring power lines.

Sincerely,
Elizabeth T. Feazel

Elizabeth T. Feazel
Rt. Last Ranch
Pagosa Spgs., CO 81147

70

Dave,

This is in response to your request for draft RMP for the San Luis Valley. While the far reaching 8 ACECs, would you please

70-1 add Elephant Rocks? Is this recommended

70-2 ACEC mean you ban mineral leasing, mineral entry & ORV use?

70-3 It would also be nice if forage increased by marginal improvements were used for wildlife versus cattle. It would also be nice if power-line corridors were rerouted around these sensitive areas. I think it is great that almost 9 miles of the Rio Grande is up for

70-4 Wild & Scenic, but a the 12 mile section north to Jacques Cemetery should not be

70-5 overlooked.

Thanks!

Ken Angell

71

11-13-89

Dear Sir:

I would like to inform you of my opinion about the BLM's existing policy. I feel your policies are unacceptably inadequate. The Bureau of Land Management is nothing more than a government

1 real estate establishment. You do not pay attention to existing scientific data in regard to ecology and resource management. You are merely a puppet organization for big businesses throughout the United States. It is your civil obligation to remember that the earth can not and will not recover at the rate we are destroying her.

Don't listen to the developers, the ranchers, the loggers, or the miners. You have the power to make a difference. I am personally sickened at the condition you have left the earth. I am appalled that I must now dedicate my life at attempting to correct the mistakes you and your generation have made. I can only pray that these mistakes are in some respect temporary.

Think of the future generations; are you willing to be responsible for these atrocities? I'm not!

Sincerely,
Pedro Paramo
U.S. Citizen

72

Dave Taliaferro
RMP Team Leader
BLM - Cañon City District Office
Box 1171
Cañon City, CO 81212

12 November 1989

Dear Mr. Taliaferro:

Please consider my comments on the draft RMP/EIS on the San Luis Valley. First I would like to thank you for recommending 8 ACECS in the Resource Area. I

72-1 insist, however, that BLM add Elephant Rocks to the list of ACES. Furthermore, I insist that BLM prohibit any and

72-2 all mineral leasing, mineral entry and ORV use within the ACES.

72-3 Grazing must not be increased in the Resource Area and no range improvements must be made. Grazing and its destructive impacts on wildlife must be eliminated from the Resource Area.

72-4 I protest the plan permitting the utility companies to construct the Xcel powerline along the Rio Grande corridor west to Flat Top Mesa and Piñon Hills WSA and I recommend that

72-5 the Wild & Scenic designation for the Rio Grande be extended an additional 12.5 miles north to the Jacques Cemetery.

Sincerely,
Tony Merten TONY MERTEN, BX 261112, LAKEWOOD CO 80226

Dave Taliaferro
RMP Team Leader
BLM - Canon City Office
P.O. Box 1171
Canon City, Co 81212

Nov 11, 1989

Dear Sir,

As a frequent visitor to Colorado drawn to the state by the unique & wonderful mountains & rivers, I am pleased to learn that the BLM's draft mgmt. plan & EIS for the San Luis valley recommends significant protection for many areas & a portion of the Rio Grande River. I strongly support your proposals regarding the 8 A.C.E.C.'s & the 8.8 miles of the Rio Grande. As a river runner who has traveled by water thru canyons in Alaska, California, the Grand Canyon, & all over the Appalachians, I view many rivers in Colorado as worthy of protection & none more worthy than the Rio Grande. I do encourage you to also include the wild & scenic designation north
73-1 12.3 miles to Lasauces Cemetery, as this section appears to me to also have the type of scenic, recreational & wildlife resources worthy of preservation for future generations. In addition, I hope you will reconsider increasing grazing
73-2 within BLM lands & instead dedicate range improvements to wildlife; prohibit off road vehicles
73-3 within the Sand Castle ACEC; find a more
73-4 acceptable environmental alternative to the current siting proposal for the Taos powerline; and
73-5 please add the Elephants Rock area to your ACEC list. Thank you for your efforts to preserve Colorado's environment.

Truly yours, a Colorado Tourist,
Gary Steinberg
7419 Cedar Ave
Takoma Park, MD 20912

1035 Franklin P.
[illegible]
[illegible]
2 November 19[illegible]

Mr. Dave Taliaferro
RMP Team Leader
BLM-Canon City Distr. Office
P.O. Box 1171
Canon City, CO 81212

Dear Mr. Taliaferro.

I wish to thank the BLM for recommending 8 "areas of critical environment concern" in the San Luis Valley. These are certainly areas worthy of federal protection.

I strongly urge that in according this protection, incompatible uses be eliminated or
74-1 excluded - in particular, mineral leasing and entry and off-road vehicle use.

I also strongly urge that certain other areas be added to the present inventory of
74-2 proposed protected areas - namely, the Elephant Rocks area, the Bishop Rocks area, and the 12.[illegible] mile
74-3 stretch of the Rio Grande upstream from the 8.8 mile stretch be included for Wild and Scenic River designation.

Again my thanks for what you have already recommended.

Sincerely,
Richard C Bradley,

P.O. Box 261112
Lakewood, Colorado 80226
11-16-89

Dave Taliaferro
RMP Team Leader
BLM Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Dear Mr. Taliaferro:

After reviewing the Bureau of Land Management's draft Resource Management Plan and Environmental Impact Statement for the San Luis Valley area, I have identified several inadequacies in the draft which I am asking you to correct.

75-1 I applaud your recommendation of eight Areas of Critical Environmental Concern (ACEC). However, the BLM neglected to include Elephant Rocks to its list of ACECs. Elephant Rocks, located north of Del Norte, is unique in its rock formations and is home to many species of rare plants. In addition, the area is of historical importance. Please add Elephant Rocks to the list of ACECs.

75-2 Although ACECs have been recommended by the BLM, they will not be adequately protected from incompatible uses. It is imperative that mineral leasing, mineral entry, and off-road vehicle use within ACECs be prohibited.

75-3 Rather than increase the number of livestock, as recommended in the RMP, I would recommend that any forage created by range improvements be dedicated to wildlife instead of livestock.

75-4 Finally, while it is laudable that the BLM has recommended 8.8 miles of the Rio Grande River for Wild and Scenic Designation, I recommend that they extend the designation an additional 12.3 miles north to the Lasauces Cemetery, as this portion has equally outstanding characteristics.

I am confident that you will represent my concerns regarding the RMP and make changes appropriately.

Sincerely,
Tony Merten

Dave Taliaferro, RMP Leader
BLM Canon District Office
Box 1171
Canon City, CO 81212

November 17, 1989

Dear Mr. Taliaferro:

While your recommendation of eight Areas of Critical Environmental Concern in the San Luis Valley is admirable, your regulations stop
76-1 short of actually protecting them. Mineral leasing, off-road vehicle access and increased grazing leave these areas open to increasing damage rather than protection.

I hope you will eliminate these uses from the proposed protected
76-2 areas. In addition, I hope you will add protection for Elephant Rocks, add Scenic Designation for the Rio Grande River north to the Lasauces Cemetery, and prevent incursion through this area by the Taos powerline.

Sincerely,
Bruce Berger
Box 482
Aspen, CO 81612

77

Dear Mr. Taliaferro

Thank you for including the 8 Areas of Critical Environmental Concern in the RMP for San Luis Valley.

Here are some further suggestions for the final draft of the RMP.

1. Include Elephant Rocks area in your list of ACECs.

2. please don't allow mineral leasing, mineral entry, or ORV use in the ACECs.

3. dedicate extra forage from range improvements to wildlife instead of livestock.

4. Don't allow a powerline to be be constructed through any ACEC.

5. extend the recommended designation of the Rio Grande River for Wild + Scenic preservation an additional 12.3 miles north to Lasauces Cemetary.

Thank you for your time,

Cynthia Dietz
Salina Star Rt, Boulder, Co.

78

Dave Taliaferro
BLM Team Leader
BLM, P.O. Box 2505
Canon City, CO. 81215

Mike Cockrell
P.O. Box 1211
Br. CO, CO. 80601

I write in regards to the San Luis Valley Draft RMP.

First, the use of ACEC designation is very appropriate for the San Luis Valley; I encourage the BLM to utilize this designation in the future, as well. I do request, however, that one area, Elephant Rocks, be added

78-1 to the list of proposed ACECs. ACECs should be adequately protected from uses incompatible with the resources the designation is intended to protect.

Thus I request that mineral leasing and entry and ORV use be prohibited

78-2 in ACECs. Recreational use of public lands is becoming the greatest single use of these lands. Because of my interest in backpacking, I request that the BLM maintain and promote non-motorized, primitive recreation opportunities. I request the BLM encourage low-impact activities and I insist the BLM prohibit vehicle use off-road across the management area.

78-3 The proposal to increase the number of livestock in this management area is unacceptable; I suggest allowing wildlife to utilize any increase in available forage. I protest plans to allow construction of

78-4 a powerline that would cross proposed ACECs; this would be incompatible uses of public lands.

78-5 Finally, I urge the BLM to extend the proposed Wild and Scenic designation along the Rio Grande some 12 additional miles north; the recreation potential of this portion of the river is very high, and the benefits of such designation would protect rich wildlife habitat in that area.

Sincerely,

Mike Cockrell

79

Caleb Gates
1429 Grand Ave # 205
Glenwood Springs, Co 81601

Dear Mr Dave Taliaferro,

I am writing to you concerning the BLM's RMP/EIS Draft for the San Luis Valley. I am inspired and glad that you have recommended 8 Areas of Critical Environmental Concern designations (ACEC's) for the San Luis Valley. On a visit to the San Luis Valley I went to one area you didn't recommend

-1 which I urge you to include as an ACEC and that is Elephant Rocks. This unique area deserves protection.

Natural Gas leasing and well drilling is very active in the Del Norte area and San Luis Valley. To consistently and fully protect the ACEC's it is

-2 imperative that you prohibit any and all mineral leasing, mineral entry and off-road vehicle (ORV) use within the ACEC's.

Construction of the two powerlines through the Rio Grande Corridor, and Flat Top Mesa and Pinon Hills WSA would not be in the interest of protecting the natural and

-3 scenic qualities of these areas. A powerline crossing the Dolores River in SW Colorado has stalled its Wild and Scenic designation.

79

Lastly and most importantly to me is that you extend the Wild and Scenic designation for the Rio Grande River. The section of river from

79-4 Lasauces Cemetery to Lobato Bridge should be included to make 12.3 miles of Wild and Scenic River on the Rio Grande. Rivers, Wetlands and associated riparian areas are the most important to sustain quality life and diversity. They are always under threat. As a rafter and fishing guide on the Gunnison River in the Gunnison Gorge, I have seen the appreciation and enjoyment on peoples faces as they visit the Canyon. Please protect these areas for us and the future animals and people.

Sincerely,
Caleb Gates

80

COLORADO HISTORICAL SOCIETY

The Colorado History Museum 1300 Broadway Denver, Colorado 80203-2137

November 21, 1989

Dave Taliaferro
RMP Team Leader
Bureau of Land Management
Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Re: San Luis Resource Management Plan and Environmental Impact Statement

Dear Mr. Taliaferro:

This office has reviewed the above document and we have the following comments:

80-1 1. Section 106 of the National Historic Preservation Act as implemented by the Advisory Council regulations 36 CFR 800 must be followed on all projects that have the potential to affect cultural resources.

80-2 2. Due to the importance of the cultural resources within the San Luis Valley, we strongly urge that the Bureau of Land Management develop a cultural resource management plan for this area.

80-3 3. We are concerned about the number of acres that are open or being opened to Off Highway Vehicle use. The more an area is used the greater the potential for vandalism. Areas that are susceptible to this type of use must be surveyed to determine if eligible cultural resources are being impacted. We suggest that areas of high site density be controlled to limit use.

If we may be of further assistance please contact Jim Green at 866-4674.

Sincerely,

for Barbara McCall

Barbara Sudler
State Historic Preservation Officer

BS/JJG

81

SIERRA CLUB

Rocky Mountain Chapter
777 Grant Street Suite 606 Denver, Colorado 80203 303 • 861 • 8819

Mark Pearson
P.O. Box 204
Grand Junction, CO 81502

November 22, 1989

Dave Taliaferro
RMP Team Leader
BLM-Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Dear Mr. Taliaferro:

I am writing to comment on the San Luis Valley Resource Management Plan and Environmental Impact Statement. These comments are on behalf of the wilderness committee of the Rocky Mountain Chapter of the Sierra Club. The Rocky Mountain Chapter of the Sierra Club consists of the 11,000 members of the Sierra Club in Colorado. Sierra Club members have a long standing interest in the management of the public resources of the San Luis Valley, including recreation, wildlife, water, rare floral and faunal species, and rivers.

The Sierra Club is heartened by BLM's designation of the San Luis Hills and Sand Castle Wilderness Study Areas as ACECs. San Luis Hills, in particular, is an outstanding and unique area. It contains a pinyon forest at the limit of its biological range and possesses stunning vistas. San Luis Hills also offers an opportunity to set aside a representative example of the landforms and ecology of the extreme southern reaches of the San Luis Valley, in contrast to the wildernesses in the South San Juans and in the Sangre de Cristos. ACEC designation is a step in the right direction for San Luis Hills; however, wilderness designation would be a more appropriate and more permanent protection.

The Sierra Club similarly supports ACEC designation of the Blanca Wildlife Area, the Rio Grande Corridor, the Trickle Mountain/Ford Creek area, the Cumbres & Toltec Railroad Corridor, Los Mogotes, and the Flat Top area. Each of these areas offers an outstanding opportunity to protect unique and valuable public resources.

81-1 However, ACEC designations are meaningless unless accompanied by stong, protective management direction. For example, San Luis Hills could be greatly impacted by mineral prospecting if another alledged

81

Mr. Dave Taliaferro
November 22, 1989
Page 2

gold mine is discovered, as occurred several years ago. The ACEC designations need to include restrictions of incompatible uses, such as mineral leasing, mineral entry, off-road vehicles, grazing (in rare plant habitat areas), even recreation. The ACECs need to be protected areas in more than name only.

81-2 One area not designated by BLM, but which is deserving of ACEC designation is the Elephant Rocks area north of Del Norte. The rock formations at Elephant Rocks and the rare plant species require the protections that a strong ACEC designation can bring.

81-3 BLM should identify the proposed powerline route through the Rio Grande Corridor and into the Flat Top Mesa area as unsuitable as a utility corridor because of its incompatibility with the ACECs that are proposed in the RMP.

The Sierra Club strongly supports the recommendation of the Rio Grande River as an addition to the federal Wild and Scenic Rivers system. We appreciate that you have the evaluated the river's natural values, and determined them to be outstandingly remarkable. The 8.8 mile segment identified by BLM for designation fits nicely with the existing Rio Grande Wild and Scenic river downstream in New Mexico. Unfortunately, BLM has left out 12.3 miles upriver to the Lasauces Cemetery which possess characteristics as equally outstanding as those in the 8.8 mile segment. We request that you modify the RMP's Wild and Scenic

81-4 River recommendation to include this upstream 12.3 mile stretch.

Sincerely,

Mark Pearson

Mark Pearson
Rocky Mountain Chapter Wilderness Chair

82

Saturday November 17, 1

Dear Mr. Taliaferro,

I like your San Luis Plan, But I think you should also look at some other issues.

82-1 I think Elephant rocks should be added to the list because, it historical significance and many rare plants live there.

82-2 I want the wildlife to be able to use the land and not the livestock

82-3 Jeeps shouln't be allowed in this valley because it destroyes the wildlife habitat.

82-4 I think the river should be save because, of rich riparian habitat with an abundance of lush vegetation, waterfowl, raptors, and other wildlife.

82-5 I don't want any power lines because, it will be ugly to see signs all over the & the San Luis.

82 [illegible] my opinion about the B.L.M. Plan for the San Luis Valley. I think the eight areas are good but please focuse on the first I had written down.

Sincerely,
Chelsea Schwartz

83

0086 Parkside Lane
Carbondale, Colorado 81623

November 20, 1989

Mr. Dave Taliaferro
RMP Team Leader
BLM Canon City District Office
P.O. Box 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro:

83-1 I'm writing this letter to request that you include Elephant Rocks as an Area of Critical Environmental Concern (ACEC) in the San Luis Area. The reason I think Elephant Rocks should be included is because it is a home to many rare plants, and it is of historical significance.

83-2 I'm also requesting that mineral leasing and off-road vehicles not be allowed in any of the eight Areas of Critical Environmental Concern, because these things are very destructive to the environment.

Please take into consideration my requests when deciding what will happen with this area.

Thank you.

Sincerely
Georgia Smith

84

November 20, 1989
P.O. box 1474
Aspen, Colorado
81612

Dave Taliaferro RMP Team Leader
BLM-Canon City District Office
P.O. Box 1171 Canon City Co.
81212

Dear Sir,
I am wondering why the Elephant Rocks area was not included in the new plan for the Areas of Critical Environmental Concern? I believe that this area is of historical significance, and should be protected.
I also think that the area should allow mineral entry and off-road vehicles to come and veiw the area. Allowing utility companies to build apowerline though the area is also a bad idea, because it would effect the scenic qualities of the area. I recommend that the scenic area along the Rio Grand River be extended from 8.8 miles to 12.3 miles. Over all I think teh ACECs' plan is a good one, and would be a great one if these changes were made.

Yours Truely
Chris Allen

November 24, 1989

85

Dear Dave Taliaferro:

85-1 I ask that you add Elephant Rocks to your ACEC's list. I am totally opposed to any ORV use in
85-2 ACEC's; and also no mineral leasing should be allowed. Please allow wildlife to forage on the
85-3 improved areas (not increased stock); NO POWER-
85-4 lines should be allowed with these scenic & natural lands. Please extend additional 12.3 miles of
85-5 river(north) to Lasauces cemetery-- this is a valuable habitat stretch of water lands. Encouraged recreational uses will guarantee economic increase & tourists will enjoy these preserved lands.

Sincerely,

Jan Hose: 21249 Highway 82
Basalt, Colo 81621

303-927-3448

Nicole Moore
1150 CO. Hwy. 74
Evergreen, CO.
80439

86

Dec. 29th, 1989

Dear Bureau of Land Management-

Thank you for recommending the 8 areas of environmental concern however,
86-1 Elephant Rocks must be added to the list. It is also crucial that you prohibit
86-2 any and all mineral leasing, mineral entry, and off-road vehicles in the newly recommended ACEC. You should con-
86-3 sider dedicating any forage created by range improvements to Wildlife instead of livestock. The Taos powerline should
86-4 not be permitted - it would not be compatible with protecting the natural and scenic qualities of these areas.

Concerning the Rio Grande River,
86-5 you need to extend the wild and Scenic Designation 12.3 miles no to the Lasauces Cemetery as portion has outstanding charac istics as well.

Thank you for considering th suggestions - Colorado is a beautiful state and we must preserve that beauty!

Sincerely -

Nicole Mor

Nov. 29, 1989

87

Dear Dave Taliaferro:

Recently I was shown a map of the various open spaces in Colorado and the areas currently being designated for off-road vehicle (ORV) use within these Areas of Critical Environmental Concern. It's rather appalling to see all the increased areas for further offroad vehicle use.

The (WSA) is a major archaeological excavation site, the Sanluis Hills WSA is a crucial winter range and the Bianca wildlife area is a major waterfowl nesting and habitat site.

Please be environmentally concerned and help
87-1 protect these areas from incompatible uses. If you don't help, the areas won't be adequately protected and mineral leasing, mineral entry and off-Road-Vehicle use will become rampant!

Please show your concern and help. Thanks!

Sincerely,
Stan K. Munson
4800 Osage #15
Boulder, CO 80303

12/5/89

Dear Mr. Taliaferro,

Thank you for your work in designating 8 areas of critical environmental concern in the draft RMP and EIS for the San Luis Valley. As a wildlife biologist, I applaud you in your concern with areas vital to rare plants and wildlife nesting, fawning, and wintering. In keeping with this action, I would like to see further effort
88-1 placed on designating the Elephant Rocks area north of Del Norte, CO as an additional ACEC. This unique formation is home to several rare plants and has historical significance as well.

Please ~~designate~~ dedicate any
88-2 forage created by range improvement Rio elk and other wildlife, instead of increasing livestock in these areas.

I also oppose the plan permittin
88-3 utility companies to construct the Taos powerline through the Rio Grand Corridor to Flat Top Mesa and Piñon Hills WSA. All these areas ar to be designated ACEC's in the pla

88

and a powerline would not be compatible with protecting the natural and scenic qualities of these areas.

One last comment - Please extend the 8.8 miles designated for the Rio Grande River as Wild and Scenic to include the 12.3 miles section north to the Lasauces Cemetary; as this portion has equally outstanding characteristics.

Thank you for your time!

Eric Zann

Eric Zann
509 Wood St.
Ft. Collins, CO 80521

89

Michael Becker
10944 W 6th Ave
Arvada CO 80004

Dear Mr. Taliaferro,

I would like to thank the BLM for its movement towards preserving the San Luis Valley. While this action is extremely commendable, it is my feeling that still more protection is needed.

89-1 I would like to see powerlines, off-road vehicles, and mineral development forbidden from the Areas of Critical Environmental Concern. It is my feeling that these land uses are incompatible with environmental protection of these areas. I believe that the aesthetic and recreational (non-motorized) qualities of the San Luis Valley would be compromised by such land use development. Again, thank you for the recent movements towards protection. I hope that the momentum remains.

Sincerely,

Michael Becker

90

SFMC — SANTA FE MOUNTAIN CENTER
(505) 983-6158

December 4, 1989

Dave Taliaferro
RMP Team Leader
Bureau of Land Management
Canon City District
PO Box 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro:

Please consider the following comments on the Draft Resource Management Plan and Environmental Impact Statement for the San Luis Planning Area, Appendix E, Rio Grande River Study Report.

I am in strong support of the *Preferred Alternative* of the Draft that recommends that "all 8.8 miles of Segment C be designated as an addition to the National Wild and Scenic River System." Such designation will provide valued protection that is also an appropriate extension to the Wild and Scenic status that exists below the Colorado/New Mexico State line.

Thank you for your attention and this opportunity to comment on the Draft Resource Management Plan.

Sincerely,

Brian Drypolcher
Executive Director

ROUTE 4, BOX 34C, SANTA FE, NEW MEXICO 87501

91

Colorado Environmental Coalition
777 Grant Street, Suite 606
Denver, Colorado 80203-3518 • 837-8701

Dave Taliaferro
RMP Team Leader
Bureau of Land Management
P.O. Box 2200
Canon City, CO 81215

December 4, 1989

Dear Dave,

The following are comments of the Colorado Environmental Coalition (CEC) regarding the Draft San Luis Resource Management Plan and Environmental Impact Statement:

Minerals Management

The analysis on the effects of oil and gas leasing and subsequent development is totally inadequate. The BLM addressed what impacts their protection stipulations would have on fluid mineral development, but never discusses what environmental impacts oil and gas leasing will have on the Resource Area.

91-1
- The plan never addresses the consequences to the resource area of full-field development.
- The plan fails to examine the cumulative impacts that oil and gas development could have on the resource area.
- The plans does not include potential scenarios on what development is likely to occur if these lands are leased.
- The plan does not give any indication of what interest there is in the area for oil and gas development.

The BLM has stated over and over again that it intends to conduct the environmental analysis for oil and gas leasing before leasing occurs within the Resource Management Plans it prepares. It is inconceivable that this document could permit leasing without any analysis of the potential impacts of oil and gas development. We also have serious problems with some important areas left open to oil and gas leasing. All the Areas of Critical Environmental Concern have been set aside to protect their outstanding natural or cultural features. Oil and gas development is not compatible with the protection of any of these special features. All ACECs should be closed to mineral leasing.

"Humanity belongs to earth, not earth to humanity"

Perennial streams, lakes and riparian areas should also be protected from mineral leasing and development. Although page 4-28 states:

> As a matter of policy, fluid mineral operations could not be allowed within the 3,230 acres of riparian resources unless such activity could be fully mitigated to the satisfaction of the authorized officer.

91-2 This is insufficient. Since a lease is a legally binding contract, this restriction must be put on the lease, or an operator can challenge the validity of such a policy. Riparian and aquatic areas should be closed to oil and gas development. If an operator desires to drill in a riparian or aquatic area then a plan amendment with full NEPA documentation should be prepared rather than allowing the authorized officer to approve such an action with no NEPA compliance.

91-3 The plan inadequately protects other sensitive areas from the affects of oil and gas development. The plan does not include protective stipulations for fragile soil and steep slope areas. Almost every other RMP in Colorado has provided protection for these sensitive areas that cannot withstand the onslaught of unmitigated development. We recommend at a minimum these areas be given a no surface occupancy stipulation. The plan also fails

91-4 to provide protective stipulations for cultural sites, waterfowl areas, municipal watersheds, scenic vistas, and public highway viewshed. Rare, threatened and endangered species of wildlife should be inventoried and their habitat be closed to leasing.

91-5 The model stipulations located in Appendix B have some disturbing aspects. These stipulations may be waived by the authorized officer, but the plan waiver clause never mentions the need for NEPA compliance or public notification for input regarding stipulation waivers. An oil and gas operator should be made aware in the lease that waivers can only occur with public input and environmental analysis, and that a waiver is not left solely to the discretion of the authorized officer.

91-6 The plan failed to look at a variety of alternatives. In each alternative only 0.5% of the lands are closed to oil and gas leasing. The BLM fails to make any determination on whether lands are suitable for oil and gas leasing. All lands that are

91-7 legally available for leasing are open to leasing. Many of these lands are not suitable for oil and gas development and thus should not be leased.

91-8 BLM has also left many sensitive areas opened to mineral entry and sale. None of the characteristics that the BLM is trying to protect in the ACECs are either compatible with mineral entry or

sale. Why then has the BLM left many of these areas open to the possible development of a hardrock or aggregate rock mines? It seems absolutely absurd that a plan would permit these activities instead of prohibiting then within the ACECs. For example, under this the proposed plan, the BLM would have to allow such activities as large open pit gold mines in the San Luis Hills ACEC and sand extraction operations in the Sand Castle ACEC.

91-9 The plan fails to provide any real alternatives with regards to locatable minerals and minerals materials. The most any alterna-

91-10 tive looks at closing to mineral entry is a scant 3% of the Resource Area. Alternatives vary from 1% to 3%, or in other words, basically no difference. With regards to mineral disposal, the most any alternative closes is just 16% of the Resource Area under the Natural Resource Enhancement Alternative Alternatives vary from 1% to 16%. Once again the difference in alternatives is negligible.

Rio Grande Wild and Scenic River

Although the Colorado Environmental Coalition is in total support of the designation of the Rio Grande as a Wild and Scenic River, we do feel that the analysis in the plan is inadequate. The BLM through this plan must develop a document which can stand on its own as a Congressional EIS. Items that must be addressed in such a plan include:

> -What quantity of water would be necessary to protect the outstandingly remarkable characteristics of the river.
>
> -What effects, if any, would this water right have on the

91-11 Rio Grande Compact.

> -An explanation of why this very junior water would not effect an existing senior water right, even if a change in use or point of diversion was to occur.
>
> -What the BLM envisions as its needs for private property acquisition, scenic easements and public access easements.

By providing this information, the BLM would alleviate much of the local fear and concern which has surfaced over this issue, and would enhance the opportunity of the river gaining a future wild and scenic designation.

91-12 We also have major concerns regarding how the BLM conducted its eligibility and suitability analysis for study segment B. This section of river is obviously eligible for the designation. It is free-flowing and possesses many outstanding remarkable characteristics. This segment of river contains a sheer-walled canyon

of volcanic rock known as the Upper Box. The lower section, recommended for designation, contains a similar feature.

The Browning Hills section is a very natural area that offers raptor nesting areas and topographic relief that would help diversify the resources found in the recommended section. Section B also offers outstanding flat-water boating opportunities and contains incredible vistas of Blanca Peak and

91-13 the Culebra Range. The BLM should recommend the 12.3 miles of river found in segment B for Wild and Scenic River designation.

Paleontological Resources

The plan identified Clayton Cone as a fossil collecting area. The plan, however, provides no analysis of what adverse effects this collecting may have on the fossil resources found at Clayton Cone. The plan fails to state whether Clayton Cone is of interest to universities or colleges as a potential area for future research. The plan fails to state whether the area has

91-14 any unique fossil resource which may provide insight in the evolutionary process or to the flora or fauna of the period which the area represents.

No analysis has been conducted on whether Clayton Cone is best suited for public fossil collecting or if it would be better served as protected area where no collecting would be allowed. CEC is opposed to having public fossil collecting areas unless it can be proven that this collecting will not have a negative impact on the paleontological resources. The BLM has failed to provide this fundamental and vital information in the RMP.

Riparian Resource Management

CEC is impressed with the plan's riparian management program. The BLM is placing increased emphasis on protecting and enhancing riparian areas. We are particularly pleased to see the mandate for improving the quality of 400 acres of riparian areas to an excellent condition.

91-15 Our one concern regarding riparian management is the 1,413 acres of lands identified in the plan with potential riparian habitat. If these lands are found to either possess riparian vegetation or have the potential to become riparian areas, what will the agency do with these areas? The plan does not say. The Final RMP/EIS should address this issue.

91-16 The RMP should also separate riverine areas from its lacustrine areas. Much of the BLM's wetland areas are of a lacustrine rather than riverine nature. Since different problems and management techniques are associated with these two type of

wetlands, the plan should address these areas separately. For example streambank erosion can be very problematic in a disturbed riverine area, while many types of waterfowl prefer lacustrine environment over a riverine environment. Since the San Luis area has substantial acreage of both riverine and lucustrine environments, management goals may vary considerably. The plan would be more complete and comprehensive if these areas were addressed separately rather than lumped together under the riparian category.

Livestock Grazing Management

We question whether the BLM is being realistic in its prediction of a 10,000 AUM increase in forage production. This could only be achieved through the use of intensive grazing management techniques. Intensive grazing management often involves high

91-17 densities of fencing, water tanks, and other range improvements. It also can involve the frequent rotation of cattle, the use of fertilizers, irrigation or planting of non-native species of grasses. The plan fails to mention which of these techniques would be used and the impacts that these developments would have on other resources.

Although we are happy that wildlife was taken into consideration for increases in forage production, we would prefer to see a greater percentage of the increases going to wildlife rather than livestock. Basically, the plan needs to come up with a more

91-18 realistic livestock management scenario for the life of this plan. With the limits of federal budgets, the more or less steady demand for red meat and the adverse impacts associated with an intensive grazing infrastructure, the BLM is not being realistic in its projections.

It comes down to whether the BLM wishes to have a plan that can be implemented or a document which gathers dust on a store room shelf. The BLM needs to rethink its grazing management scenario outline in the plan. We realize that the BLM is using the earlier San Luis Grazing EIS in developing its predictions.

91-19 Since the Final San Luis Resource Area Grazing Management EIS came out in the late 1970's how much of the increase predicted has been realized? The increase that has occurred during the past 10 years may give a better indication of what the likely increase would be over the life of this plan.

91-20 We have other recommendations regarding grazing. Any increase in forage production within the Los Mogotes or Trickle Mountain ACECs should be dedicated to wildlife. Both of these areas are being given an ACEC designation because of their wildlife resources. It seems only natural that any increases in forage should be dedicated to wildlife priorities rather than livestock.

In fact, if current livestock use of these areas is adversely affecting wildlife, than the BLM should consider cutting back livestock numbers to better protect the wildlife.

1 The BLM should examine methods of excluding livestock from riparian areas as well as state that any increases in the number of livestock cannot be to the detriment of wildlife.

Forest and Woodland Management

2 The BLM has failed to examine the need to protect old growth forest resource on its lands. The plan needs to include an inventory of old growth acreage and must examine what percentage of this acreage will be left in this condition. Certain wildlife species must have old growth forest to meet their habitat requirements. The BLM has proposed to cut 98% of its commercial forest lands and 96% of its productive operable woodlands on a sustained yield basis. This policy will leave virtually no old growth areas on BLM lands within the Rio Grande drainage.

3 The BLM needs to examine a more balanced approach to forest and woodland management which will allow for not only harvesting of timber resources but also protection of forest values, such as visual quality, wildlife habitat, watershed, recreational opportunity and old growth.

Land and Realty Management

4 We recommend one change in the proposal for potential acquisition areas. Lands along the west side of the Great Sand Dune National Monument should be included as potential land acquisition sites. The current land ownership within the proposed Sand Castle ACEC and the rest of the western flank of the Great Sand Dunes has high concentrations of Paleo-Indian cultural sites. Currently land ownership in the area is a mix of BLM, state school lands, and private lands. If the BLM could block up ownership in this area, it would better protect these nationally significant cultural resources.

5 We have concerns regarding the Taos 345 kV powerline corridor. This proposed corridor is not compatible with the resources that the BLM is trying to protect within the Rio Grande River Corridor and the San Luis Hills ACEC. Having large overhead powerlines going through areas that BLM have slated for intensive recreation and protection of natural characteristics is absurd. The BLM needs to examine alternate corridor routes that would avoid these sensitive areas.

6 Los Mogotes, Sand Castle, and the Cumbres and Toltec Railroad Corridor should also be included as utility corridor exception

areas. All three of these areas have resources which would be adversely affected, therefore, the integrity of the areas would be compromised with the future construction of utility corridors.

Areas of Special Concern

We are very impressed with the effort BLM put into identifying Areas of Critical Environmental Concern (ACECs). The plan, however, fails to adequately protect the ACECs which were designated.

The Smithsonian Institute considers the San Castle ACEC and the entire west side of Great Sand Dunes National Monument to have some of the best example of Paleo-Indian resources in the nation. Officials for the Smithsonian have stated that off-road vehicles (ORVs) are destroying many of these significant resources. In the plan the BLM has not closed this area to ORV use. This is beyond comprehension to us. Sand Castle has also been left open for future consideration of utility corridors, mineral entry, mineral leasing and mineral sales. None of these uses are compatible with the reasons for protecting this significant area. Although Sand Castle has been given an ACEC designation for its significant cultural, geological and biological resources, these resources will not be adequately protected under the proposed plan.

The San Luis Hills did not receive adequate protection either. San Luis Hills was designated an ACEC to protect its outstanding vistas, critical wildlife habitat, and special plant values. These resources require a very natural setting, and thus the ACEC should protect this area. The plan, however, would permit the construction of the Taos 345 kV powerline, ORV use, and mineral leasing within the southern portion of the ACEC without no surface occupancy (NSO) stipulations. The plan would also permit mineral entry in the entire unit and mineral sales in the southern portion of the ACEC. Once again, none of these uses are compatible with the resources that the BLM is trying to protect in this ACEC. Why then has the BLM decided to permit such uses?

91-27 The Blanca ACEC contains significant wetland resources. The area is heavily used by waterfowl as well as recreational users. The BLM, however, has only placed seasonal restrictions on oil and gas development and leaves the area opened to mineral sales. These uses are not compatible with the protection of the outstanding wildlife habitat found in this area.

91-28 The Rio Grande Corridor ACEC was designated to protect riparian areas, its recreational opportunities, and outstanding wildlife habitat. The plan permits mineral entry in the northern portion of this unit from Labatos Bridge to Lasauses. This northern Dave

portion of the ACEC is also left open without any restrictions to ORV use. Mining and ORV use are not compatible with the outstanding recreation and wildlife resources found in the northern part of the ACEC. Both of these activities could severely mar the scenic and natural integrity of this area, thus adversely effecting wildlife and recreation. These activities could also affect efforts to restore the Rio Grande's riparian areas to a more natural and productive condition.

9 The Trickle Mountain ACEC is one of the most outstanding wildlife areas in the entire state. Trickle Mountain is home to Colorado's four major big game species. The BLM will permit oil and gas development in this area with only seasonal restrictions, mineral entry, and mineral sales. Utility corridors will also be permitted. The BLM is once again permitting a number of activities which would have substantial adverse impacts on the wildlife habitat that BLM is trying to protect.

10 The Cumbres and Toltec Railroad ACEC has been designated to protect the viewshed of this historic railroad corridor. The plan leaves this area open to mineral leasing, mineral entry, and utility corridor construction. None of these activities are compatible with maintaining the historical and scenic integrity of the Cumbres and Toltec Railroad Corridor. Mines, oil wells and powerlines would mar the scenery that the ACEC is trying to protect.

Los Mogotes ACEC was designated to protect wildlife habitat for four big game species which includes fawning areas and critical winter range. The area also contains special plants in need of protection. The plan permits oil and gas leasing, mineral entry, mineral sales, and utility corridors within the Los Mogotes area. Uncontrolled ORV use can occur in this unit most of the year (a seasonal restriction on much of the area during the winter and birthing times). CEC supports vehicles being permitted only on designated roads. The BLM then can implement a white-arrow signing system which would better protect the area. Mining, oil and gas development and the construction of powerlines or pipelines are not compatible with the wildlife and special plants that are supposed to be protected in the Los Mogotes ACEC.

11

The BLM has failed to conduct adequate analysis into what the consequences of management decisions made in the plan will have on the various resources that the agency is trying to protect in the various ACECs designated in the plan. The BLM must do a more thorough job in addressing consequences of these decisions. If a management decision is going to have adverse impacts on the resources that the agency wants to protect, then changes in the plan should occur.

12

The Coalition also recommends two additional areas for ACEC designation. The Elephant Rocks and Bishop Rock are both well deserving of ACEC designation. Elephant Rocks contains rare plants and outstanding scenery. The plan states on page 2-42 "[t]he site may require special management to help conserve these plants and to retain the visual integrity of Elephants Rocks themselves. If the site does need special management, it should be designated an ACEC. An ACEC gives the BLM more flexibility in managing the area to protect these special features. In fact, a management plan specific to the area must be prepared. We also support including the wagon ruts as an historic resource addition to the Elephant Rocks ACEC.

CEC recommends that Bishop Rock be designated an ACEC. Bishop Rock contains significant rock art and the outstanding scenery of the Bishop Rock itself. The area would benefit from the protection an ACEC would offer the area. ACEC designation would also be a selling point to Congress if the BLM wanted to consolidate land holdings in the area to better protect the rock art sites along Dry Creek.

Recreation Management

CEC supports the designation of the Rio Grande Corridor and the Blanca Wildlife Area as Special Recreation Management Areas (SRMA). Both of these areas receive intensive recreational use and would be better managed and protected with the SRMA designation.

91-33 Our major concerns regarding recreational use center around ORV use restriction. These restrictions are totally inadequate. Almost the entire Resource Area is left open to uncontrolled off-road vehicle use. This is not a prudent management decision. CEC, at most, can only support very limited areas being left open to ORV use. In order to protect the outstanding resources found on these BLM lands, much stricter controls on ORV use need to be implemented. ORVs can destroy vegetative cover, wildlife habitat and make areas undesirable for other forms of recreational use. We recommend a complete reworking of this section of the plan to better protect the resources from the destructive use of ORVs.

Visual Resource Management

91-34 We question why no areas have been given a Class I Visual Resource Management designation. We recommend three areas be given this designation.

1) The area around the Great Sand Dunes National Monument deserves this designation. Great Sand Dunes is a resource of national significance and in order to protect the viewshed seen

91

Dave Taliaferro
December 4, 1989
Page Ten

from the monument, the BLM should designate its lands under a Class I designation.

2) All the lands in and around the areas recommended for inclusion into the Sangre de Cristo (proposed) Wilderness should also receive this designation because of the need to protect this nationally significant area.

3) Finally, the lands located in the Rio Grande Corridor and San Luis Hills ACECs should receive the Class I designation because of significance of this site to recreation and protection of natural environments within the valley.

We appreciate this opportunity to comment on the San Luis Resource Management Plan and Environmental Impact Statement. We hope that you will give serious consideration to the various changes we have recommended in our comments. We look forward to seeing the final plan.

Sincerely yours,

Kirk Koepsel

Kirk Koepsel
Public Lands Coordinator

92

STATE OF COLORADO
Roy Romer, Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
Perry D. Olson, Director
6060 Broadway
Denver, Colorado 80216
Telephone: (303) 297-1192

REFER TO

Dave Taliaferro
RMP Team Leader
Bureau of Land Management
Canon City District Office
P.O. Box 1171
Canon City, CO 81212

11 December 1989

Dear Mr. Taliaferro:

I have reviewed the draft San Luis RMP and offer the following comments for your consideration.

In general the draft appears to have addressed past concerns and is better for wildlife resources. The minerals management section has increased the total number of acres to be placed under NSO, precluded areas and seasonal use restrictions, which can only benefit wildlife. Winter range is very important to wildlife populations and protection from disturbance will help maintain healthy herds as well as reduce potential big game private landowner conflicts. However, I do think that the March 31 ending date may potentially impact herds during some winters. Extending the exclusion dates to December 15 through April 15 would help prevent problems at a critical time period. Protecting birthing areas will benefit those species identified in the plan. 92-1

Riparian areas constitute important wildlife habitat, and we support protection of these areas from rigths-of-ways and other activities. We also support modifications of grazing allotment plans to enhance and protect riparian habitats.

I was glad to see that the AUM's have been allocated differently than presented in the last draft. Available forage is now divided in a 60/40 split, with 60% to nonlivestock uses. We support these efforts by the BLM to enhance public resources on public lands. Wildlife and other natural resource values will be enhanced and /or protected with this management direction.

DEPARTMENT OF NATURAL RESOURCES, Hamlet J. Barry, Executive Director
WILDLIFE COMMISSION: George VanDenBerg, Chairman • Robert L. Freidenberger, Vice Chairman • William R. Hegberg, Secretary
Eldon W. Cooper, Member • Rebecca L. Frank, Member • Dennis Luttrell, Member • Gene E. Peterson, Member • Larry M. Wright, Member

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RMP page 2

We support the protection and development of Blanca WHA, and other wetland areas on BLM in the valley. These are very important habitats for wildlife and the San Luis Valley supports the best waterfowl production areas in the state of Colorado.

I noticed that this draft has shied away from discussing thermal and hiding cover in regards to forested lands. I hope this does not reflect management intentions concerning timber harvest and planning. Although this topic is a hard one to get a handle on, it none the less is very important to wildlife populations to plan in order to ensure adequate habitat with good spatial relationships. We would encourage the BLM to attempt to provide for at least some minimum cover requirement guidelines to be developed at some future time. 92-2

We support the proposed OHV use restrictions on important wildlife areas. This plan has increased the acres under limited use, and this will be a positive step for wildlife.

The BLM should consider what steps might be possible to help protect the colony of Brazilian free-tailed bats (Tadarida brasiliensis) at the Orient Mine. This is a very unique situation, the northern most known colony of predominately male bats of this species known in the world. I realize that the land is privately owned, but it is almost totally surrounded by BLM land. The Black Canyon designation will help protect this area, at least from the east. If I read your maps correctly, woodland timber harvest would only occur to the south around Garner Creek. Seasonal use restrictions around the site would be of great benefit to protecting the roost site, say from 1 June through 31 October. This is the time period when the bats are using the mine. I would be more than happy to work with you on this subject if you agree that additional special considerations are warranted. 92-3

Additionally, there is little specific attention for nongame species in the draft plan. The BLM has very important nongame wildlife resources under its care in the valley, the above being just one of the standouts. 92-4

Dave Kenvin, one of our local district wildlife managers, asked me about a verbal agreement with the BLM to prevent livestock grazing in one of the La Garita Bighorn Sheep areas. However, this is something that would be discussed under the allotment grazing management plan for that particular allotment, as I understand the process.

92

RMP page 3

Overall, the plan looks pretty good and if anything, leans more towards the resource protection end than most other plans I have reviewed from multiple use agencies. Thank you for the opportunity to comment on the revised draft, if you have any questions regarding these comments, please give me a call.

Sincerely,

Kirk W. Navo

Kirk W. Navo
Habitat Biologist
Monte Vista office
(719) 852-4783

cc: Wetherill
Clark
J. Schwarz, BLM
files

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

93

Centers for Disease Control
Atlanta, GA 30333

December 5, 1989

Mr. Dave Taliaferro
RMP Team Leader
Bureau of Land Management
Canon City District Office
P.O. Box 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro:

We have completed our review of the Draft San Luis Resource Management Plan and Environmental Impact Statement (Plan/EIS). We are responding on behalf of the U.S. Public Health Service.

There are currently two land use management plans covering the San Luis Resource Area, and several BLM EA's and EIS's exist for various program activities in the planning area. We recognize that these overlapping plans may address our comments, however, because this Plan/EIS provides direction for management for the next 15 to 20 years, we believe that it should specifically address appropriate planned mitigative efforts related to increased recreational use, public safety around hazardous areas, and increased unauthorized dumping. We offer the following comments regarding these issues.

The resource area provides a significant amount of dispersed recreation opportunities, and this is expected to increase at a rate of about 6.9 percent per decade. While this Plan/EIS indicates that "intensive recreation management" would maintain recreation opportunities, it does not specifically address potential impacts on the environment or health and safety. General topics of concern include garbage collection and disposal, restroom facilities, and safe drinking water. What facilities are planned, or, if the area is to remain in a primitive setting, what guidance will be given to recreationist regarding these environmental health concerns.

On page 2-58, we note that man-made hazards vary from area to area within the planning area, and "a more detailed inventory is needed to determine the nature of these hazards (content, size, value, toxicity, etc.)." While many of these sites have been identified and barriers and signs have been posted, there were no plans noted for further study. Mitigation plans should be identified in the Final Plan/EIS regarding human health and safety and the identification of additional hazardous areas, including abandoned mine shafts which are expected to be in the area.

93

93-3 It is stated that unauthorized dumping appears to be on the increase, primarily because some authorized landfills are inconvenient to use and dumping fees are required on some. Without implementing appropriate mitigation plans, these problems will probably worsen. Consideration should be given to mitigative measures that may help reduce this problem of illegal dumping.

Thank you for the opportunity to review and comment on this Plan/EIS. Please insure that we are included on your mailing list to receive a copy of the final document, and future DEIS's which may indicate potential public health impact and are developed under the National Environmental Policy Act (NEPA).

Sincerely yours,

Kenneth W. Holt

Kenneth W. Holt, M.S.E.H.
Environmental Health Scientist
Center for Environmental Health
and Injury Control

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24 Elm St.
Montrose, CO 81401
1 December 1989

94

Mr. Dave Taliaferro:

I am very concerned about the BLM's plan for the San Luis Valley. I applaud their designations of "ACEC" for various areas; however, I would like to see Elephant Rocks added to the list. I would also like to have the BLM prohibit all mineral leasing, mineral entry, and off-road vehicle use with these areas.

A few more suggestions: the grazing on BLM land should be shifted to wildlife instead of livestock; the powerline suggested should not run through the ACECs; and the area of the Rio Grande River designated Wild & Scenic should be extended.

Thank you.

Kristine Johnson

95

Brian Shields
~~Route 4, Box 74~~
~~Taos, NM 87571~~
~~Tel: (505) 758-9299~~
73 JANE ST.
NEW YORK, NY 1001.
(212) 629-2004
12/1/89

DEAR DAVE TALIAFERRO;

I AM WRITING TO YOU WITH REGARDS TO APPENDIX "E" OF THE SAN LUIS RMP & EIS.

I WOULD LIKE TO POINT OUT A MAJOR INCONSISTENCY IN THE REPORT: UNDER THE SUB-HEADING "EVALUATION ON PAGE E-11 IT SAYS "RECREATION USE IS GROWING RAPIDLY, THERE IS INCREASED DISTURBANCE OF NESTING WATERFOWL AND PREDATORY BI AND SUCCESSFUL WILDLIFE REPRODUCTION IS BEING DIMINISHED." YET UNDER THE PREFERRED MANAGEMENT ALTERNATIVE THE DOCUMENT CAL FOR EMPHASIS ON INTENSIVE DEVELOPMENT FOR RECREATION (PAGES E-12, AND TABLE E-1)

95-1 BY CALLING FOR INTENSIVE RECREATIONAL USE, NO MATTER HOW WELL IT IS MANAGED, THE WILDLIFE RESOURCES OF THIS VERY SENSITIVE AREA WILL BE ADVERSELY IMPACTED. I RECOMM THAT, IN ORDER TO MITIGATE THE ALREADY EXISTING PROBLEM FROM RECREATIONAL USE, THE PREFERRED ALTERNATIVE DE EMPHASIZE RECREATI AND PLACE MORE EMPHASIS ON UPGRADING THE EXISTING NATURAL RESOURCES THROUGH WILDLIFE HABITAT ENHANCEMENT, RIPARIAN ZONE PROTECTION AND MINIMUM FLOW STUDIES.

95-2 HAVING LIVED IN SAN LUIS, CO. AND TAOS, NM SINCE 1969 UNTIL VERY RECENTLY, AND HAVING WORKED CLOSELY WITH THE BLM TAOS RESOURCE AREA ON PROTECTING THE RIO GRANDE BY SETTING UP AMIGOS BRAVOS, FRIENDS OF THE WILD RIVERS, I HAVE BECOME VERY FAMILIAR WITH THIS SECTION OF RIVER. MOREOVER, I HAVE WORKED AS A COMMERCIAL GUIDE AND OUTFITTER ON THE RIO GRANDE FOR THE PAST 15 YEARS AND IN THAT CAPACITY I HAVE WITNESSED THE IMPACT THAT RECREATIONAL USE HAS ON SENSITIVE WILDLIFE HABITA

THANK YOU FOR TAKING MY RECOMMENDATION INTO CONSIDERATION.

PLEASE KEEP ME INFORMED ON THE RMP AND ISSUES IMPACTING ON THE RIO GRANDE

SINCERELY

December 4, 1989

Dave Taliaferro
RMP Team Leader
BLM-Cañon City District Office
P.O.Box 1171
Cañon City, CO 81212

Dear Mr. Taliaferro,

I am writing regarding the BLM's draft Resource Management Plan and EIS for the San Luis Valley. Overall, the plan appears to be a very good one and I sincerely thank you for your efforts in drafting it. However, there are some changes that could be made that would make it an even better plan.

96-1 Please add Elephant Rocks and Bishop Rock to the list of ACEC's. These areas deserve inclusion because of their unique formations, historical formations, and the presence of many species of rare plants.

96-2 Also, to protect these lands adequately no mineral leasing or off-road vehicle use should be allowed. Grazing of

livestock as well as permitting power lines to be constructed should be totally prohibited in these areas. These activities are extrememly destructive to the land itself and are inhibitory to the ability of the majority of people to enjoy these lands.

96-3 Finally, I am asking that approximately 12 miles of the Rio Grande River extending north to the Lasauces Cemetery be added to the 8.8 miles that the BLM has recommended for Wild and Scenic designation. This section is rich in vegetation and wildlife and offers many recreational opportunities such as river rafting, birdwatching, hiking and camping.

Sincerely,
Margaret Murray
2716 W. 25th Ave
Denver Co 80211

Cañon City, Colo.
DEC 8 2 PM '89

Dec. 4, 1989
1273 C. Rd 17
Del Norte, Colorado
81132

Bureau of Land Management
P.O. Box 2200
Cañon City, Colorado
81215-2200

Dear Sirs:

I very much appreciated your sending me the September 1989 Draft on San Luis Valley Resource Management Plan. It is an impressive book and I value it.

I must apologize for taking so long to acknowledge it and thank you. Also to make the following correction. My life was so overloaded I could not get to write this letter.

There is a dreadful historical error on p. 2-53, "Affected Environment" paragraph.

-1 * Sentence #1: Don Juan de Oñate was long gone, departed from this life in 1696! He came with his settlers to the San Juan Indian pueblo of the Espanola Valley in 1598. He explored east to the buffalo plains, upland west to the Gulf of California, but no documents ever show him coming north to the San Luis Valley (altho I'm always suspected some of his colonists may have secretly made trips here while he was gone exploring east and west instead of minding his colony)

* Sentence #2: "A number of well recorded trips were made from Santa Fe to SLV during the 17th & 18th centuries, most outstanding Don Diego de Vargas, 1694, and Don Bautista de Anza, 1779. And in 1807, the hundred dragoons sent to the Conejos from Santa Fe by Lieutenant Zebulon Pike. There were others, not as well known but recorded, and some not recorded but thought probable.

* A post settlement was made, 1853, before "the 1840s" on the Conejos, and previous visits by trappers, traders and early settlers camps in the San Luis Valley county areas today are Costilla and Conejos counties.

Of special interest to me are your plans for the Rio Grande Corridor Area, Elephant Rocks Area, and Flat Top Area. Are you acquainted with the wonderful maps made on the Rio Grande Gorge in 1965 by the Texas Wildlife & Conservation Association? What a satisfaction that you are working on the Rio Grande Corridor Area, taking care of the upper part & approach to the Gorge and its Wild River!

Nuts but wishes,

Sincerely,

Ruth Marie Colville

12/4/89

To Dave Jalufferre,

I am writing this letter because of my concerns for the development in the San Luis Valley. In my personal opinion I think that any wilderness left should be preserved as much as possible. The fact that the BLM did not
1 include Elephant Rock in its list of ACEC's is either irresponsible or ignoring the fact that if this area was destroyed many people would regret it after it was already ruined.

If these pieces of land
-2 are so important that they are in the ACEC list then why would anyone want to destroy all the vegitation and wild life by having livestock, mineral leasing, minerals entry and off road vehicles. If there was livestock on all of this land there would be hardly any vegitation and it would make the scenic aspect of the area would be less appealing. I can't believe that anyone would ever

allow off road driving in a ACEC area. It would completely ruin all vegitation and people would take advantage of that opportunity and destroy all the pristine land. This also could be very dangerous for all wild life. Mining on this land would just exagerate the problem of off road driving and just turn away lots of wild
98-3 life. The idea of permiting the Tacs power line go through all this unharmed land is unbelievable and will destroy this land. If people want this to stay ACEC land then why let civilization destroy it.

Sincerely,

Anna Crusty
Aspen Middle S.
Colorado.

P.O. Box 4612
Aspen, Co. 81612

To whom it may concern,

I'm writing this letter in result that you include Elephant Rocks as an area of critical environment
+-1 concern (ACEC's) in the San Luis area. The reason I think Elephant Rocks should be included is because it is a home to many rare plants and it is of historical significance.
+-2 I am also requesting that mineral leasing and off road vehicles not be allowed in any of the eight areas of Critical Environment concern.
+-3 The Tacs powerline should be allowed because it would hurt many people of the distruction of the TACS powerline.

Please take into consideration my requests in the results of this area.

Thank you,

Sincerly,
Francie Pedro
A student of Aspen
Middle School (8th)

Molly Schroeder 100
1375 Snowbunny Ln.
Aspen CO 81611

Dear The Bureau of Land Management,

I think that your Idea of keeping these lands to the environmental Services and public.

100-1 I do strongly Sugest that you include the Elephant Rocks in your plan I personaly think that they are a pritiful place and I would like to keep them protected.

100-2 I don't think that on these lands their should be mineral leasing or off Road Vehicles Should be alloud.

100-3 I think that it would be terible to have power lines in such scenic Areas. People come so far to see these areas and try to take pictures but they are disturbed by the telephone wires.

I strongly sugest all of these points.

Sincerely,

Molly Schroeder
Aspen Middle School

101

1555 East Lake Place
Littleton, CO 80121
December 7, 1989

Mr. Dave Taliaferro
BLM-Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Re: San Luis Valley Resource Management and Environmental Impact Statement

Dear Sir:

We are writing you to express our ideas and concerns about preservation of BLM open lands in the San Luis Valley for posterity. First, we thank you for recommending eight ACEC's in this Resource Area, but believe and fear that they will not be adequately protected from incompatible uses. We insist that to protect all these areas as really untrammaled, natural, unspoiled and beautiful, the
101-1 BLM must prohibit all or any mineral leasing, mineral entry and off-road vehicle use. These would really be basically incompatible.

101-2 We intensely recommend that the BLM add the Elephant Rocks area, located north of Del Norte, to your list of ACEC's because it is also unique as to rock formations and many species of rare plants.

101-3 We have felt for years that the BLM has permitted their grazing policies to get out of control in many areas with over-grazing to the extent of severe ecological damage and recommend a new concept be established, that you dedicate new forage created by range improvement for wildlife instead of livestock.

101-4 Another issue of concern is what we consider as inadequate designation of the Rio Grande River for Wild and Scenic status. The 8.8 miles you have recommended in Colorado, from the Labatos Bridge south to the New Mexico border, is great, and we thank you for it. However, in view of the fact that 12.3 more miles of the river extending northward to the Lescauces Cemetery flows through country which is rich in riparian habitat, we urge you to extend your Wild and Scenic designation to a total of 21.1 miles in Colorado. We understand that the raptor population in this region is as great as that found in the Birds of Prey area of the Snake River in Idaho and offers marvelous river recreational opportunities.

Sincerely yours,

Laurence M. Currier, M.D.
Laurence M. Currier, M.D.

Jeanette L. Currier
Mrs. L. M. Currier

Baca Center for High Altitude Sustainable Agriculture
BCHASA P.O. Box 34 · Crestone, CO 81131 (719) 256-4452

15 December 1989

Mr. Dave Taliaferro
RPM Team Leader
BLM-Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Dear Sir;

I recently recieved a flyer from the Colorado Environmental Coalition concerning the Resource Management Plan for the San Luis Valley. They make a number of points of which you are no doubt aware. I would like to comment on those that I am more familiar with. It was encouraging to see the number of areas
102-1 designated as ACEC. Though I can't vouch for the importance of the Elephant Rocks region, it obviously is better to protect something now rather than regret it's loss later. And we have too many examples to show that fragile land not protected from
102-2 off-road vehicles or mining can be devastated. Further, the proposed Taos powerline is completly incompatible with maintaining natural environments. Its rare when other ideas and options more suitable cannot be found.

102-3 Of greater concern to me is the grazing of livestock on public land. Having lived nearly 20 years in the southwest and spent much of it out of doors, I have seen the effect of cattle graze on BLM land. The ranchers carry substantial political clout and the patterns have been in place for generations. Still, it appears to be time to recognize our errors and take whatever action is necessary to preserve what we have left.

Please consider the requests of the many concerned organizations and individuals as plans and decisions are being made. Thank you for your time and the valuable work you do.

Sincerely,

Paul W. Motsinger
Director

103

Dec 10th, 1989

To Whom it Concerns,

I would like to submit a few comments on the BLM's management plan for the San Luis Valley.

I would urge the BLM to give greater protection to the areas they are going to designate as ACEC's. These areas are set aside because
103-1 of their "uniqueness" - be it rare plants, high wildlife concentration, pristine riparian habitat, etc. I would suggest that ORV usage, mining & mining exploration, & the building of powerlines compromise this uniqueness & should not be allowed. After all, it is activities such as these that have made most of the rest of our country "ordinary".

Colorado's lack of wild & scenic protection for the rivers & streams is disrespectful, to say the least. I would like to see
103-2 the BLM expand its proposed wild & scenic designation for the Rio Grande all the way up to the Lasauces Cemetery. The river speaks for itself as to its worthiness for this designation.

And last, I would stress reducing, not increasing, the
103-3 number of livestock grazing BLM lands. The extra forage provided would do a lot for the health of wild animals that used to use this country.

Thanks

Sincerely
Kathy Hinds
& M Ranch
Magnolia Starkle
Nederland, CO
80466

December 13, 1989

Mr. David Taliaferro
RMP Team Leader
Bureau of Land Management
Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Re: Comments on the Draft San Luis Resource Management Plan and Environmental Impact Statement

Dear Mr. Taliaferro:

We are writing to express our concern with the portion of the above-referenced plan which proposes to designate the Rio Grande near the Colorado-New Mexico stateline as a wild and scenic river under the National Wild and Scenic River System. We strongly encourage you not to designate the Rio Grande for the following reasons:

-1 1. The Rio Grande in that reach could hardly be described as "free-flowing." While there are no dams in this area, the source of the water for much of the year comes from irrigation return flows from lands in the San Luis Valley because the waters of the Rio Grande within the San Luis Valley are, in many years, totally utilized all summer by irrigation diversions and municipal users with no water available to the lower reach of the river. Any effort to "restore" this stretch of the river would have significant adverse consequences on the San Luis Valley. You have failed to consider this situation in your analysis.

2 2. The water which is delivered through this reach of the river occurs as the result of administration for the Rio Grande Compact and not because the river is in a "natural" condition. It is essential that the State of Colorado and the water users in the San Luis Valley have freedom to administer the existing water rights under the Rio Grande Compact. Any effort to "restore" the Rio Grande will inevitably place limitations on Colorado's

Mr. Taliaferro
Page 2
December 13, 1989

ability to utilize its compact-apportioned share of the river's flow.

3. The Rio Grande and Conejos Rivers and tributaries thereto are grossly over-appropriated and there are substantially greater legal rights to the use of water in most years than there is water in the stream.

104-3 4. The establishment of a wild and scenic river in this reach would create a reserved water right which the federal management agency would then have the ability to utilize to frustrate changes in water rights and improved water use efficiency within the San Luis Valley. This in turn would cause enormous expense to our citizens.

104-4 5. The Rio Grande below the Colorado stateline is already designated as a wild river and this short segment in Colorado is unnecessary to protect the river within New Mexico.

104-5 6. There is a suggestion in the referenced plan that the administrative control over the river would be placed in the hands of the Taos Resource Management area, a situation which we find to be unacceptable.

104-6 7. Over half of the land along the river corridor proposed for designation is in private ownership and we specifically resist the concept that the federal government would come in and force land use controls and restrictions on private land owners.

104-7 8. The Wild and Scenic Rivers Act allows your agency to condemn private land if the river is designated. We strongly resist a designation which would then permit the condemnation of private property.

104-8 9. This river should not be managed solely for the benefit of a few floaters. It does not have the requisite outstanding remarkable values to justify its inclusion.

104-9 10. The management of this river can be accomplished just as well through a special resource management area which would protect the existing values but would not impose the onerous burdens and restrictions on the citizens of the San Luis Valley that a national wild and scenic river would impose.

104-10 11. The draft resource management plan establishes that the proposed designation of the Rio Grande would have no economic benefit to our region and we see no reason to impose these new restrictions without any benefits.

Mr. Taliaferro
Page 3
December 13, 1989

-11 12. We believe that the Rio Grande River Study Report, Appendix F to the referenced document, is wholly inadequate. It ignores existing water use and water quality data. It draws conclusions which are unwarranted by the facts and it fails to consider the bulk of the impacts to both the natural and human environments within the San Luis Valley.

We respectfully request that the Bureau of Land Management withdraw its recommendation to designate the Rio Grande above the Colorado-New Mexico stateline as a wild and scenic river and instead manage the area pursuant to special management status.

Very truly yours,

John B. Shawcroft
President,
Alamosa-La Jara Conservancy District

PO Box 703
Taos, NM 87571

December 18, 1989

Dave Taliaferro
Bureau of Land Management
Canon City District
PO Box 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro:

This is to record my support for the Natural Resource Enhancement Management Plan as the necessary and appropriate plan for managing the San Luis Resource Area in southern Colorado. I believe that wildlife protection and the goal of acquiring scenic or protective easements on the east side of the river should be included in the Resource Management Plan.

105-1 As the Resource Management Plan shows, excessive and/or untimely recreational use of the Upper Rio Grande Box has created pressures on raptor and water fowl populations. Regulation of the recreational boating season is necessary to prevent permanent and irreversible damage to the wildlife in the area.

105-2 The Rio Grande between Lobatos Bridge and the New Mexico state line should be administered as if it had received Wild and Scenic designation; I hope that the BLM will support such designation by Congress.

Sincerely yours,

John M. Muste

Dave Taliaferro
RMP Team Leader
BLM Canon City District
P.O. Box 1171
Canon City, CO 81212

Dear Mr. Taliaferro:

This letter is in support of the status
106-1 of impact for the San Luis Valley. I feel however, that one important area has been neglected, that of the Elephant Rocks near Del Norte.

I also feel that by allowing any
106-2 un-environmentally interest access to the area is a mistake. These mistakes include ORV's, mineral leasing or
106-3 mineral entry & any increase to the numbers of livestock allowed on the

106-4 lands. Also to allow power or utility companies into the area destroys the scenery. Please consider.

106-5 Lastly more of the river needs to be considered so as not to endanger habitats & vegetation.

If you're going to protect, Please, lets protect.

We are all counting on you to protect. What once unprotected, will be lost forever.

Thank you in advance

Joe Stanfield

Joe Stanfield
1520 E 10th Avenue 105
Broomfield, CO 80020

LYNN KOPPMAN President
R. EARL DAVIS Vice-President
NELL WYLEY Secretary-Treasurer
RALPH CURTIS General Manager
FLOYD CHILES Director
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JOHN SHAWCROFT Director
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LEROY TEEM Director
RAY WRIGHT Director

RIO GRANDE WATER CONSERVATION DISTRICT
10900 HIGHWAY 160 EAST — ALAMOSA COLORADO 81101-9518
Phone Alamosa (719) 589-6301 Phone Saguache (719) 655-2244

December 19, 1989

Mr. David Taliaferro
RMP Team Leader
Bureau of Land Management
Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Re: Comments on the Draft San Luis Resource Management Plan and Environmental Impact Statement

Dear Mr. Taliaferro:

These comments are submitted pursuant to the instructions contained in your public notice dated September 29, 1988, and relate to the draft San Luis Valley Resource Management Plan and Environmental Impact Statement. These comments are submitted on behalf of the Rio Grande Water Conservation District, a public agency of the State of Colorado established pursuant to C.R.S. §37-48-101, et seq., with responsibility for the conservation and management of the water resources of the Rio Grande drainage in Colorado. We have reviewed your Resource Management Plan with an eye toward its water use aspects, and we will leave other comments to separate governmental agencies in the San Luis Valley. Our comments will relate to three separate issues within the planning documents and the appendix. The first comments relate to your proposal to designate portions of the lower Rio Grande within Colorado pursuant to the national Wild and Scenic River law. The second area of comment relates to suggestions within the document that the Closed Basin Project could or would be utilized for the purpose of improving stream flows in the lower Rio Grande. The third comment relates to the Plan's proposal concerning wetland development and management.

107-1 The Rio Grande and Conejos Rivers and their tributaries are grossly over-appropriated streams. With rare exception, many of the water rights in our valley go unsatisfied during much of the year because of the lack of physical supply. In addition, the Rio Grande Compact imposes onerous obligations on the water users

Mr. Taliaferro
Page 2
December 19, 1989

of the Rio Grande and Conejos Rivers to meet delivery requirements specified in tabulations of relationships contained in Article III of that Compact. During almost every year and in a majority of the months of any year, an enormous percentage of the
107-2 water flowing in the Rio Grande below Alamosa results from return flows and inflows into the river below the last diversion at the New Ditch. As a result, the water which is flowing in the river from just below Alamosa to the stateline is water which has been previously placed to beneficial use. Now that the Closed Basin Project has been partially completed, a portion of that flow may also come from the Project which is ground water pumped from the sump area of the Closed Basin and transported to the river through a conveyance channel. The Rio Grande Water Conservation District is the owner of the water right for the Closed Basin Project and is the local sponsoring entity for the Project which is being constructed by the Bureau of Reclamation.

Of primary concern to the citizens of the San Luis Valley represented by the Rio Grande Water Conservation District is the suggestion that the Rio Grande Study Report contained in Appendix E to the San Luis Resource Management Plan constitutes an
107-3 acceptable or proper Environmental Impact Statement. Nothing could be further from the truth. Appendix E, treated as an Environmental Impact Statement, does not consider any impacts whatsoever as a result of this federal action outside of alleged impacts contained within the reach of the river under study. This federal action has the potential to alter for all time the ability of the citizens of the San Luis Valley to utilize their
107-4 water rights system efficiently. It places a federal reserved water right at the Colorado stateline which can be used to throttle all future efforts for changes in water use, increased water management, improved or different methods of water allocation, and the like. None of these impacts are considered.

The applicable federal statute, 16 U.S.C. §1271, et seq., gives the federal government the right to condemn private
107-5 property within the reach, to condemn easements in the reach under study, and to enforce stricter water pollution requirements on entities returning water to the Rio Grande upstream of the reach. None of these impacts on others is considered by the alleged Environmental Impact Statement. There is extensive discussion in the record concerning the need to acquire and
107-6 maintain instream flows within the reach, but there is no recognition that there are substantially greater legal rights to the use of water upstream of the reach than there is water in the stream. Yet, the Environmental Impact Statement makes no inquiry into the source of the water for such flows or the economic and
107-7 environmental impact on other water users and citizens within the San Luis Valley as the result of efforts to acquire those instream flow rights. In total, Appendix E fails to assess any

environmental impacts resulting from the designation, other than the obvious impact that the river will stay as it currently exists. Those of us who live in the San Luis Valley did not require thousands of federal dollars or the opinions of experts to suggest that the Rio Grande canyon surrounded by extremely arid desert would remain much as it currently exists for a long time. Native intelligence seems to suggest as much.

8 On page E-1 of Appendix E there is a discussion concerning the conclusion that the reach warrants inclusion in the national Wild and Scenic River. The statement was made that it was considered with the New Mexico reach and dropped, so this current action is a reconsideration. However, there is absolutely no justification stated for reconsideration nor is there any explanation why this reach was dropped the first time. Absent specific facts to the contrary, the federal agency should be guided by the action of its predecessors and Congress in not designating the reach, rather than to pass over the apparent Congressional determination without further inquiry.

9 On page E-4 of the Appendix, there is a statement that the reach is free-flowing with high water quality; yet, at other points in the Appendix and the report, particularly page 3-3 of the basic management plan, the agency acknowledges that there is insufficient data, in its opinion, to determine what the water quality and flows are and that further study is required. These statements are inconsistent and further indication of the inadequacy of the Environmental Impact Statement/Rio Grande Study Report.

The report acknowledges that the entire east side of the segment under consideration is a subdivision which presents a potential problem for designation. There is also some discussion concerning the actual location of the western boundary of the Sangre de Cristo grant at that point. So that there is no question in your mind, let me state that it is the position of 10 the water users in the San Luis Valley and their counsel that the Sangre de Cristo grant goes to the centerline of the Rio Grande throughout this reach. As you suggest on page E-9 of the report, you intend to acquire easements or ownership interests along the entire east side of the Rio Grande. Given your right to exercise condemnation under the Wild and Scenic River legislation, we must 11 oppose any designation predicated on the taking of private property for the benefit of a very few elite river runners. Furthermore, we must take issue with your statement that the river is free-flowing and possesses outstanding and remarkable 2 values. This is a slow, sluggish river for all but two months of the year. The waters that occur within its banks are the result of return flows from upstream use or waters artificially introduced into the river through the Closed Basin Project. There is

nothing even approaching free-flowing about this stream. In fact, in average and dry years, the river effectively disappears through the late summer when demands for water throughout the basin greatly reduce the quantity of water available.

107-13 Most important to the San Luis Valley, to this District, and to the citizens we represent is the provision in the statute which provides that your agency will seek to "restore" this river to its wild state once it has been designated. That you would even consider undertaking an effort to destroy the economy of the entire San Luis Valley boggles the mind, but yet you have come right out and stated that this is your intention when one reads your recommendation, together with the statute. It would be 107-14 literally impossible to "restore" the Rio Grande near the Colorado-New Mexico stateline without undoing 130 years of effort by our forefathers to control this river and place it to beneficial use for the good of mankind. There is currently insufficient water available within our valley to meet all of the needs of the citizens who live here and desire to use it. That you would suggest a wild river near the stateline having a water right demanding or competing for the same water that our citizens need is insulting. It is bordering on deceitful for your environmental impact statement to look solely at the river as it currently exists and fail to consider the impacts of the Congressional requirement tnat your agency, once the river is designated, must seek to restore it to its natural, wild condition. Any effort to "restore" the river will place enormous burdens on Colorado and its citizens and limit its ability to maximize the use of the waters apportioned to it by the Rio Grande Compact while continuing to meet the strict terms and conditions of that agreement.

107-15 On pages E-10 and E-11, the purpose behind this designation becomes apparent. It is there that you suggest the necessity for designating two miles of the reach solely for the purpose of allowing points for floating access to be included in the reach. It is also on these pages that you suggest that management of this area be turned over to the Taos Resource Management area. We find this completely unacceptable. As near as we can tell, the purpose of the Taos agency is to foster whatever conditions are necessary to protect the economic interests of the Taos/Santa Fe rafting industry. There are few entities within Colorado competing for this trade and, as your document states at various locations, there is no economic benefit to Colorado as a result of this designation. There is absolutely no excuse for your agency to recommend designation of this reach as a wild and scenic river based solely on the pressure of the New Mexico rafting interests advanced through your Taos office. Further, there is no reason for you to voluntarily turn over control of this vital resource to an agency having its interests lying

outside this state. While you clearly have no interest in such things, it bears commenting that the States of Colorado and New Mexico compete for the use of the Rio Grande water resource. We recognize our Compact obligations to the State of New Mexico and meet them, but we do not require further confusion and contention to be introduced into an already complicated issue by your agency's New Mexico office.

Finally, we do not understand why it is inappropriate to manage this resource through a special resource management area. We certainly do not oppose protecting land forms in the Rio -16 Grande canyon which can be accomplished, without adverse water right consequences, through such a special management option. It would have all of the advantages to your agency with none of the statutory and regulatory disadvantages inherent in the wild and scenic river designation.

With regard to our first major point, I would summarize our concerns as follows:

1. We oppose designation of the Colorado segment of the Rio Grande gorge as a wild and scenic river because it will require your agency to seek to "restore" the river to its original wild and natural condition.

2. It is impossible to carry out the functions of the national Wild and Scenic River law without impairing or infringing upon the State of Colorado's rights, entitlements and obligations under the Rio Grande Compact.

3. It is completely unacceptable to place administrative control over the Rio Grande in Colorado in the hands of the Taos Resource Management Area.

4. The obligations which the national Wild and Scenic River law places on your agency to eliminate pollution upstream of a wild and scenic river segment will cause the citizens of the San Luis Valley enormous expense in future years.

5. Over half the land along the river corridor proposed for designation is privately owned and we strongly resist the recommendation on the grounds that it will require your agency to impose upon the owners of that property substantial federal land use controls and restrictions and, furthermore, will permit you to condemn private property within our state.

6. There is absolutely no legitimate reason to designate this river as wild and scenic, except to assuage the demands of the rafting industry in New Mexico. Such a designation, as you

have acknowledged, would have no economic benefit to the State of Colorado or the San Luis Valley.

7. The putative Environmental Impact Statement is a sham and cannot be accepted as reviewing any real impacts of the proposed designation. It fails to look at all of the significant impacts arising from the designation and provides only a superficial, limited and myopic view of the most obvious impacts of designating the Rio Grande canyon. On the other hand, in the alternative analysis, there is no suggestion that the lack of designation would have any different impacts or that the river would be in any different position without designation. Where it fails to even consider impacts is in the area where your agency knows designation will most certainly cause impacts, namely, to all of the citizens located upstream of this reach.

8. Finally, for the purposes you have outlined, the management of this river can be accomplished just as well through a special resource management area, which your agency is fully entitled to operate.

The next issue which must be addressed relates primarily to the Resource Management Plan itself and a statement contained on page 3-3 thereof which concerns the Closed Basin Project. First of all, there is discussion of minimum stream flows in conjunction with discussions concerning the wild and scenic river. Our review of the national Wild and Scenic River legislation suggests no such tie. There is no provision in that statute suggesting 107-17 that minimum stream flows are either appropriate or acceptable because the purpose of such a designation is to "restore" a stream to its natural condition, not simply to preserve minimum flows.

The Closed Basin Project is being constructed by the U.S. Bureau of Reclamation. It salvages water lost to nonbeneficial evapotranspiration in the sump area of the Closed Basin area of the San Luis Valley and transports the same to the Rio Grande. It is an artificial conveyance system being constructed to assist the State of Colorado in meeting its Compact commitments and the States of Colorado, New Mexico, and Texas and the United States in meeting the commitments to the Republic of Mexico. In addition, water is delivered from this Project to the Alamosa National Wildlife Refuge and the Bureau of Land Management's Blanca Habitat Area. The purposes to which this water may legally be placed are contained in Pub.L. 92-514. There are no other current legally authorized uses for Closed Basin Project 107-18 production. The maintenance of instream flows is not among the uses enumerated by the Congress of the United States, and your suggestion is directly contrary to the instructions of the Congress.

Furthermore, the water right for the Closed Basin Project is not owned by the federal government, but by the Rio Grande Water Conservation District. That water right contains provisions that the same may be used for purposes of preserving instream flow values. However, reliance on the conditions contained in the District's decree requires the consent and agreement of the Rio Grande Water Conservation District. In addition, we would have to seek the cooperation of the Colorado Water Conservation Board, which is charged with determining necessary instream flows in Colorado. No consent has been given by the Rio Grande Water Conservation District, nor is it likely to be given, under current circumstances. As we have explained to the Taos regional office of your agency on numerous occasions, the District does not oppose the concept of Project flows benefiting the Rio Grande through the Rio Grande gorge. The District does oppose, however, the Bureau of Land Management obtaining the right to call for Project operation solely for purposes of maintaining those flows. If we can work together within the mechanism of the Congressionally authorized purposes in a way that meets the timing and volume requirements of Colorado water users while at the same time addressing the needs of the Bureau of Land Management, we are happy to consider doing so; but, we will resist any effort by your agency to insist or demand that those flows occur in the river at any particular time or in any particular quantity. You have no legal basis for making such demand and, to do so runs counter to the express directions of the United States Congress. You ought to recognize the irony of recommending a river for wild status and, at the same time, in the same document, recommending operation of a water salvage project to produce flows for the "wild" river. 107-19

One final comment concerning the streamflow issue and the Closed Basin Project needs to be addressed. The last two ditches on the Rio Grande which control all of the flow in the river during many months of the year are the Chicago Ditch and the New Ditch. These ditches are owned by the United States Fish and Wildlife Service and are used to irrigate the Alamosa National Wildlife Refuge. But for these two ditches, there would be a substantial minimum streamflow in the Rio Grande for a greater period of time than currently exists. There is no discussion in any of your documents concerning your relationship with your sister federal agency and the very serious and significant impact its operations have on the flows of the Rio Grande below its headgates. Finally, the Bureau of Land Management has a Congressionally authorized interest in the Closed Basin Project under Priority No. 2 of Pub.L. 92-514. Most certainly, your agency should feel free to undertake the steps necessary to transfer your interest in the Closed Basin Project production under Priority No. 2 from the Blanca Habitat Area to the Rio Grande as 107-20 107-21

a flow enhancement mechanism, if that is your wish, and we would certainly work with you in that endeavor. I am certain the Colorado Water Conservation Board and the Division Engineer would cooperate as well.

In summary, the following points need to be made in this regard:

1. There is no Congressionally authorized priority for use of Closed Basin Project production for the maintenance of instream flows through the Rio Grande gorge.

2. The Rio Grande Water Conservation District owns the water right to the Closed Basin Project. It is not currently disposed to dedicate the use of its water right to the maintenance of instream flows through the gorge based upon the demand of your agency. In addition, other Colorado agencies have responsibility for determining instream flows within the state and their role is not mentioned.

3. There is the potential that operating arrangements can be worked out which would allow the Closed Basin Project to be operated in accordance with the Congressional legislation with a benefit being derived for the Rio Grande below the Closed Basin Project conveyance channel, but any such benefit must always be secondary to the primary purposes of Project operation.

4. The Bureau of Land Management needs to make a proposal to the Bureau of Reclamation, the Rio Grande Water Conservation District, and the Colorado Water Conservation Board, if it wishes to pursue this suggestion contained in the Resource Management Plan and the Plan is deficient in its failure to itemize the BLM proposal in this regard.

5. The Management Plan and Environmental Impact Statement completely fail to deal with the water rights which dewater the Rio Grande in its lower reaches, namely, the Chicago and New Ditches owned and operated by the U.S. Fish and Wildlife Service for the Alamosa National Wildlife Refuge.

The final topic which we wish to address relates to your discussion of the Blanca Habitat Area, the Emperious tract and the Dry Lakes contained in and around page 2-22 of your draft Resource Management Plan. First of all, the San Luis Valley has substantial wetlands and there is nothing wrong with seeking to manage additional wetland areas. However, you provide that you wish to develop an additional 1,805 acres of new wetlands. You do not provide the source of water for this wetland development and that becomes the critical failing in your plan. The record should be abundantly clear that there is no likelihood, under 107-22

current circumstances, that you can obtain additional wells for wetland development without complete augmentation of the impacts of those wells. In order for your resource plan to have any meaning or to address any of the issues in a realistic fashion, the plan must identify the source of augmentation water which would be utilized for the well development if further wetland development is to occur. It must also identify the location of the injury from utilizing wells to provide wetlands. In particular, the effect on artesian conditions in the San Luis Valley must be analyzed.

It has been the position of the Colorado State Engineer's Office for a number of years that the development of additional wells in the San Luis Valley, either in the confined or unconfined aquifer, will not be permitted absent such a plan for augmentation. As you are fully aware, the United States government has been joined in Colorado water right adjudication proceedings in Water Division No. 3 and, as a result, your Resource Management Plan is completely inadequate with regard to its discussion of wetland development. It completely disregards your agency's obligation to acquire water rights for those wetlands under Colorado state law, to obtain replacement water for injury caused by these new depletions, and to identify the mechanism for accomplishing that replacement. One of the great ironies of this entire planning effort is the dramatic inconsistency between your wetland statements and the proposal to create almost 2,000 acres of new wetland when contrasted with the substantial depletions that result to the Rio Grande system from such development. The depletions that you propose will be ultimately evidenced in reduced stream flows in the Rio Grande gorge, which runs directly counter to your proposal to designate the lower Rio Grande as a wild and scenic river and to protect and restore its flows. You are either extremely naive in your understanding of the hydrologic forces at work in the San Luis Valley or extraordinarily cynical. 107-23

On behalf of the Rio Grande Water Conservation District, I would like to thank you for the opportunity to comment on your Resource Management Plan and, in particular, on the Environmental Impact Statement, and recommendation that the lower Rio Grande within Colorado be designated under the national Wild and Scenic River law. As you can discern from the foregoing, my Board of Directors, on its own and on behalf of those whom it represents, 107-24

strenuously opposes any designation of the Rio Grande for that purpose, and we ask you to withdraw that recommendation.

Very truly yours,

RIO GRANDE WATER CONSERVATION DISTRICT

Lynn Kopfman
President

cc: Governor Roy Romer
Senator Tim Wirth
Senator Bill Armstrong
Representative Ben Campbell
John Sayre, Assistant Secretary of the Interior
Bob Pastore, State Senator
Lewis Entz, State Representative
Dr. Jeris A. Danielson, State Engineer
J. William McDonald, Director, Colorado Water Conservation Board
Hamlet Barry, Executive Director, Dept. of Natural Resources
Board of Directors, Rio Grande Water Conservation District
David W. Robbins, Esq.
Operations Committee, Closed Basin Project
Boards of County Commissioners: Rio Grande, Saguache, Alamosa, Costilla, Conejos and Mineral Counties
Robert Towry, Division of Wildlife

108

Dec. 18, 1989

Dave Taliaferro
RMP Team Leader
BLM-Cañon City District Office

Dear Dave,

I would like to express my appreciation that your agency has listed a number of areas of Critical Environmental Concern (ACEC) in the San Luis Valley. I think that these areas are unique and that they deserve special treatment. I would recommend another unique area, Elephant Rocks, to be included in the ACEC's. Also, I believe that the Rio Grande Corridor should be extended upstream to the Lasauces Cemetery; this extension would protect important wildlife areas, along the river.

The BLM, in naming these important areas, has made an applaudable step in environmental issues, but more needs to be done. The ACEC's need protection from activities incompatible with the protection granted them. I believe that mining and off-road vehicle use should be excluded; in addition, the Tos Powerline should not be allowed through these areas. I hope the BLM can actively protect these unique areas.

Keep up the good work!

John Kuzmiak

109

Dave Taliaferro
Bureau of Land Management
Canon City District
POB 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro,

109-1 I am writing to make known my support of the Natural Resource Enhancement Management Plan as the appropriate river management plan for the San Luis Resource Area in Southern Colorado. My concern is that wildlife protection, with goals to acquire scenic or protective easements on the east side of the river, be included in the RMP.

109-2

109-3 As noted in the RMP, excessive or untimely recreational use on the Upper Rio Grande Box has created pressures on the raptor and water fowl population. Without regulation of the recreational boating season, permanent harm will result to wildlife populations.

109-4 The reach of the Rio Grande between Lobatos Bridge and the New Mexico state line should be administered as if it were Wild & Scenic, and BLM should support Wild & Scenic designation by congress.

Sincerely,

110

SAN LUIS VALLEY WATER CONSERVANCY DISTRICT
835 1st Avenue • P. O. Box 43
Monte Vista Colorado 81144
(719) 852-2315

FLOYD L. GETZ, Manager
Monte Vista, CO

December 19, 1989

Mr. David Taliaferro
RMP Team Leader
Bureau of Land Management
Canon City District Office
P. O. Box 1171
Canon City, CO 81212

Re: Comments on the Draft San Luis Resource Management Plan and Environmental Impact Statement

Dear Mr. Taliaferro:

We are writing to express our concern with the portion of the above-referenced plan which proposes to designate the Rio Grande near the Colorado-New Mexico stateline as a wild and scenic river under the National Wild and Scenic River System. We strongly encourage you not to designate the Rio Grande for the following reasons:

110-1 1. The Rio Grande in that reach could hardly be described as "free-flowing." While there are no dams in this area, the source of the water for much of the year comes from irrigation return flows from lands in the San Luis Valley because the waters of the Rio Grande within the San Luis Valley are, in many years, totally utilized all summer by irrigation diversions and municipal users with no water available to the lower reach of the river. Any effort to "restore" this stretch of the river would have significant adverse consequences on the San Luis Valley. You have failed to consider this situation on your analysis.

110-2 2. The Rio Grande and Conejos Rivers and tributaries thereto are grossly over-appropriated and there are substantially greater legal rights to the use of water in most years than there is water in the stream.

110-3 3. The establishment of a wild and scenic river in this reach would create a reserve water right which the federal management agency would then have the ability to utilize to frustrate changes in water rights and improved water use efficiency within the San Luis Valley. This in turn would cause enormous expense to our citizens.

CHARD MESSICK, President, Monte Vista, CO. ACIE GUNNELS, Vice President, Center, CO PUSSELL PRATT, Secretary/Treasurer, nte Vista, CO. Directors: ROBERT MYERS Center, CO; KELLY YEAGER Del Norte, CO; KEITH HOLLAND Center, CO; ANGELO CURTO, amosa, CO; ATHIE DANIELS, South Fork, CO; CLIFF HARTMAN, Alamosa, CO; SID KLECKER, Monte Vista, CO.

110

Page 2

110-4 4. This river should not be managed solely for the benefit of a few floaters. It does not have the requisite outstanding remarkable values to justify its inclusion.

110-5 5. The management of this river can be accomplished just as as well through a special resources management area which would protect the existing values but would not impose the onerous burdens and restrictions on the citizens of the San Luis Valley that a national wild and scenic river would impose.

110-6 We respectfully request that the Bureau of Land Management withdraw its recommendation to designate the Rio Grande above the Colorado-New Mexico stateline as a wild and scenic river and instead manage the area pursuant to special management status.

Very truly yours,

Richard Messick

RM/mc

111

United States Department of the Interior

FISH AND WILDLIFE SERVICE
COLORADO FIELD OFFICE
730 SIMMS STREET
ROOM 292
GOLDEN, COLORADO 80401

IN REPLY REFER TO:

Memorandum

DEC 20 1989

To: Dave Taliaferro, Resource Management Plan Team Leader, Bureau of Land Management, Canon City District Office, Canon City, Colorado

From: Colorado State Supervisor, Fish and Wildlife Enhancement, Fish and Wildlife Service, Golden, Colorado

Subject: Comments on Draft San Luis Resource Management Plan and Environmental Impact Statement

We offer the following comments on your Draft San Luis Resource Management Plan and Environmental Impact Statement. Our comments primarily involve Astragalus ripleyi, the Ripley milkvetch. It is the most sensitive plant in the San Luis Resource Area and will be a Category 2 candidate threatened/endangered species on the updated 1990 Notice of Review. The Federal status of Listed Threatened shown in Table 2-35 on page 2-60 of is in error.

111-1 Also, its habitat description in Table 2-35 should read "ponderosa savannah with fescue grassland on deep soils over volcanic substrates."

111-2 In previous meetings between the Service, the Colorado Natural Areas Program, and the San Luis Resource Area personnel, we and the State have proposed the Ra Jadero Canyon area as an Area of Critical Environmental Concern (ACEC) for the Ripley milkvetch. We still recommend its inclusion in the Preferred Alternative for the following reasons. The ACEC screening criteria listed on page H-1 include relevance and importance.

Criteria for relevance are special values present and values requiring special management attention. Ra Jadero Canyon contains the Ripley milkvetch, a candidate species, which requires special management to prevent further decline. It appears to be very sensitive to grazing as evidenced by its occurrence within fenced areas that provide it coincidental protection, such as the Fox Creek Cemetery (no plants occur nearby outside the fence), and the presence of larger than usual plants within the highway right-of-way in Conejos Canyon. Elsewhere, within its range, it usually occurs only as scattered, few-stemmed plants, often with the tops grazed off or else within bushes. The Ra Jadero Canyon area has been in non-use in recent years and this lack of livestock grazing probably accounts for the large size and good condition of this population.

111

Criteria for importance include special worth or distinctiveness and cause for concern. The range of the Ripley milkvetch extends from Tres Piedras and Questa in New Mexico north approximately 50 miles as far as the Alamosa River at the north end of Conejos County in Colorado. The Ra Jadero Canyon area contains the largest population of the Ripley milkvetch, approximately 1,850 plants, compared to other populations with usually only about 50-100 plants. Therefore, it has special worth. While the Ripley milkvetch has definite ecological criteria of elevation, soils, and associated vegetation, this habitat type occurs over a wide range. It appears that the Ripley milkvetch is a once more common species that has been severely impacted and whose numbers have been greatly reduced, in this case by livestock grazing as discussed above, rather than a naturally rare species. For this reason there is cause for concern for the future status of the Ripley milkvetch. We thus believe that the Ra Jadero Canyon area meets the screening criteria for ACEC selection. Designation of an ACEC at Ra Jadero Canyon for the Ripley milkvetch is needed to give the species priority management there in order to protect it.

The discussion of Ra Jadero Canyon in Table H-3 on page H-9 for ACEC screening is inadequate; and, therefore, the conclusion to address special management for the Ripley milkvetch at another BLM ACEC (Los Mogotes) is not justified. The analysis of site criteria only states the presence of the Ripley milkvetch at Ra Jadero Canyon; it does not analyze its application to the ACEC screening criteria of relevance and importance as we have done above. The Los Mogotes ACEC cited for special management for the Ripley milkvetch is a poor substitute. It contains a much smaller population (200-300 plants) and its primary reason for designation is winter range for wildlife game species. However, there is a water development immediately adjacent to the Ripley milkvetch population at Los Mogotes which concentrates grazing use in that area, resulting in a direct conflict between management for the Ripley milkvetch and forage in the Los Mogotes ACEC.

The Ripley milkvetch needs its own ACEC at Ra Jadero Canyon for priority management of its largest population. We also support priority management for protection and enhancement of riparian areas.

Thank you for the opportunity to comment. We look forward to working with you on the San Luis Resource Area in the future.

Attachments

cc: FWS/FWE, SLC
FWS/FWE, GJ

112

Box 10706
Ranchos de Taos, N.M. 87557
12/17/89

Mr. D. Taliaferro
BLM, Canyon City District
Canyon City, Col.

Dear Mr. Taliaferro

I am writing to express my concern over valuable resources along the Rio Grande. It seems that the best way to protect the wildlife resource is to

112-1 implement, for the San Luis Resource Area in Southern Colorado, the Natural Resource Enhancement Management Plan and designate as Wild &

112-2 Scenic the area below Lobatos Bridge. I would also like to see restrictions put on boating in this area for the protection of the bird population.

Sincerely,

Thomas B. McArthur

113

friends of the dunes, inc.

Mr. Dave Taliaferro, RMP Team Leader
Bureau of Land Management
Canon City District Office
P.O. Box 1171
Canon City, CO 81212

11500 hwy 150 * mosca, co 81146 * (719) 378-2312

December 13, 1989

Dear Mr. Taliaferro;

113-1 The Board of Directors of the Friends of The Dunes, the citizens support group for the Great Sand Dunes National Monument, would like to express our opposition to the designation of the combined Sand Castle/Cattleguard location as a "Limited" use area for Off-Highway Vehicles (OHV) as proposed in the September 1989 draft volume of the San Luis Resource Management Plan. We believe that this designation should be changed to "Closed" to OHV.

The Board is composed of educators, scientists, outdoorsmen, archaeologists, and Colorado historians. Although, the basis for our opposition is quite diverse, we are strongly unified in our opposition to the limited use designation. A few of the problems that we believe are inherent in this proposal are:

(1) Destruction of plant life in this unique environment;
(2) Destabilization and possible migration of presently stable sand in the low angle dunes existing in this area;
(3) Lack of adequate BLM and NPS enforcement staff to assure that the OHV users comply with the limited uses of the proposal;
(4) An uncontrollable lack of permanency for the boundary markers between the designated area and the National Monument -- the fence lines in this area often become covered by migrating sands;
(5) Possible destruction to, and loss of artifacts from, the numerous unexcavated archeological sites in the area;
(6) The loss of the "wilderness" experience that is currently available to Monument visitors who trek to the western perimeter of the GSDNM.

We are not opposed to the concept of OHVs having designated areas for recreational riding, however, we believe that the choice of the Sand Castle/Cattleguard area for this type of use is inappropriate and frought with numerous problems as stated above. We encourage you to amend the proposed designations so as to close this area to OHV use.

Sincerely yours;

114

United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
12795 W. Alameda Parkway
P.O. Box 25287
Denver, Colorado 80225-0287

IN REPLY REFER TO
D18 (RMR-PP)

DEC 22 1989

Memorandum

To: District Manager, Canon City District, Bureau of Land Management

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Review of Draft San Luis Resource Management Plan/Environmental Impact Statement, Colorado (DES-89/0018)

We have reviewed the above-referenced document and offer the following comments.

1) The Resource Management Plan (RMP) fails to adequately address lands other than those administered by the Bureau of Land Management (BLM) within the San Luis Resource Area. Great Sand Dunes National Monument (GRSA), located on the east side of the resource area, is mentioned a few times in the document, mostly regarding land transfers, and the boundaries of GRSA are only identified on two maps, Map 2-2 and the plan base map found in the map pocket. All remaining maps identify the location of the GRSA headquarters but do not delineate the monument's boundary. Also, the monument is referred throughout the plan as "Sand Dunes." 114-1

One existing and six potential National Natural Landmarks (NNL's) are also not identified in the plan. Both GRSA and these existing or potential NNL's should be described in the "Affected Environment" section of the Draft Environmental Impact Statement (DEIS) and included in pertinent maps. Details on the existing and potential NNL's within the resource area are included as an attachment to this memorandum. 114-2

2) The "Environmental Consequences" section of the DEIS fails to describe potential impacts to GRSA and the existing and potential NNL's from the management actions identified. Rather, this section concentrates on the impacts to BLM-administered resources and resource uses from existing or proposed BLM management actions. 114-3

3) The DEIS does not adequately address the potential cumulative impacts on the resources and resource uses within the Resource Area, including GRSA and the existing and potential NNL's, from the various proposed management actions. The word "cumulative" is used sparingly in the document and no discussion of cumulative 114-4

114

impacts clearly describes to the reader the "incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what Agency (Federal or non-Federal) or person undertakes such future actions" (40 CFR 1508.7).

MINERAL RESOURCES

4) Under the RMP's Preferred Alternative, 99.5% of BLM-administered surface lands and mineral estate within the Resource Area would be available for leasing, 98% would be open to mineral entry and location, and 97% would be open to the extraction of mineral materials. Added to this availability of mineral resources, the DEIS projects that three to seven Applications For Permit to Drill (APD's) will be submitted for BLM approval in the Resource Area within the next year.

If the Preferred Alternative is approved, and if the APD development scenario becomes a reality, there is potential for impacts not only to BLM lands but also to other lands within the Resource Area such as GRSA and the existing and potential NNL's. We suggest that the DEIS address the potential significance of exploration and development adjacent to these areas of National Park Service (NPS) concern, including the possible visual and hydrological impacts associated with mineral development. We also suggest that you routinely notify the NPS of any proposed mineral developments which may affect areas of NPS concern (such as GRSA or the NNL's), as required by the BLM-NPS Interagency Agreement which states that each Agency notify any affected Agency of any action considered under current and proposed planning documents. 114-5

AIR RESOURCES

5) GRSA is a Class I Air Quality area, affording it maximum protection from air quality degradation. The NPS is currently conducting air quality monitoring at GRSA and offers to provide data to you. Any activities that would impact the monument's Class I Air Quality status should be considered in your planning. 114-6

GROUNDWATER RESOURCES

6) Preliminary studies in and around GRSA (Krystinik 1988 and Fryberger 1988) indicate that groundwater levels and dune stability are related. While your RMP does not call for major water developments, we want you to be aware that major changes in the water table could have a drastic effect on the dunes, both inside GRSA and those dune areas outside of the Monument on BLM lands. 114-7

114

2

RECREATION MANAGEMENT (OFF-HIGHWAY VEHICLE USE)

7) We have several concerns regarding Off-Highway Vehicle (OHV) use south of GRSA in the Sand Castle Area of Critical Environmental Concern (ACEC):

- We question how OHV use will be confined to this area. The experience of staff at GRSA is that constant patrol and enforcement are needed to prevent unauthorized use and vandalism of natural and cultural resources. Does the BLM have the enforcement funds and staff to assure the protection of these resources? And, if the State of Colorado will administer the area, do they have the means to protect natural and cultural resources? 114-8

- The protection of unique plant and animal habitat is a major concern to the NPS. For example, two interesting insects found nowhere else on earth are located in the Great Sand Dunes area - the Great Sand Dunes tiger beetle and the giant sand treader camel cricket. Other specialized forms of life inhabit the sand dunes community, and some of them may be strictly indigenous. Vegetation stability in this area is directly related to the movement of sand. Will OHV use alter the vegetation and allow for the erosion and movement of soils? 114-9

- The Sand Castle area will border the Great Sand Dunes Wilderness Area. The primitive and wilderness type values must be seriously considered in contrast to the visual impact, dust, and noise created by OHV use along the southwest boundary of the Wilderness Area. Even though throughout the RMP/DEIS there are statements about the negative impact of OHV's on cultural, natural, and scenic values, the only specific OHV dune riding recreational opportunity is in a unique and valuable natural and cultural resources area. Are there alternative areas which would be less sensitive? 114-10

- We are very interested in reviewing any future plans to manage the Sand Castle ACEC.

- We have documented incidents of archeological resource vandalism and theft along our common boundary with the Sand Castle area. OHV use may adversely affect archeological sites and can lead to increased site vandalism. Again, the question of OHV regulation and the protection of important resources surfaces. 114-11

114

WILD AND SCENIC RIVER SYSTEM

8) The BLM is to be complimented on the Rio Grande River Study Report (Appendix E). 114-12

We appreciate the opportunity to comment on this document. If you have any questions or wish clarification on any of our comments, please contact Mr. Michael Duwe of my office at FTS 327-2830 or (303) 969-2830.

Richard A. Strait

Enclosure

12/89

Dave Taliaferro
Bureau of Land Management
Canon City District
POB 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro,

115-1 I am writing to make known my support of the Natural Resource Enhancement Management Plan as the appropriate river management plan for the San Luis Resource Area in Southern Colorado. My
115-2 concern is that wildlife protection, with goals to acquire scenic or protective easements on the east side of the river, be included in the RMP.

115-3 As noted in the RMP, excessive or untimely recreational use on the Upper Rio Grande Box has created pressures on the raptor and water fowl population. Without regulation of the recreational boating season, permanent harm will result to wildlife populations.

115-4 The reach of the Rio Grande between Lobatos Bridge and the New Mexico state line should be administered as if it were Wild & Scenic, and BLM should support Wild & Scenic designation by congress.

Sincerely,

Charles Myers

Charles Myers
P.O. Box 77
Tres Piedras, NM 87577

State Representative
LEWIS H. ENTZ
1016 North 11th Lane
Hooper, Colorado 81136
Home (719) 754-3750
Capitol 866-2963

COLORADO
HOUSE OF REPRESENTATIVES
STATE CAPITOL
DENVER
80203

Chairman:
Local Government Committee
Member:
Transportation and Energy Committee
National Conference of State Legislators Agricultural Committee

December 13, 1989

Mr. David Taliaferro
RMP Team Leader
Bureau of Land Management
Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Re: San Luis Resource Management Plan
and Environmental Impact Statement

Dear Mr. Taliaferro:

Thank you for this opportunity to comment upon the resource management plan that you have prepared for the San Luis Valley. In most regards, you are to be commended for your efforts. The plan is certainly extensive and gives us all a clear picture of what your agency proposes.

116-1 Despite your efforts, however, the recommendation contained in the plan which calls for the designation of the lower Rio Grande as a wild and scenic river is completely unacceptable. As you are well aware, the designation of a river under the National Wild and Scenic River law, 16 U.S.C. 1271, et seq., not only protects the land along the river, but also creates a federal reserved water right for as much water as the federal land managers determine is necessary. Obviously, with over 600,000 acres of irrigated farm land, as well as tens of thousands of citizens and their communities located upstream from this segment, it is completely unacceptable to have a wild and scenic river designation which gives federal regulators the ability to control changes in water use patterns and development.

116-2 As an elected representative of these citizens, I must strenuously resist your proposal. The Rio Grande and Conejos Rivers are greatly over-appropriated and there is no water, other than that delivered to Texas and New Mexico under the terms of the Rio Grande Compact, which would be available for instream use without creating inevitable and unacceptable adverse consequences

Mr. Taliaferro
Page 2
December 13, 1989

for the citizens living upstream in the San Luis Valley. The purpose of the National Wild and Scenic River legislation is not to provide federal officials, such as yourself, with control over the destiny of citizens of the San Luis Valley, but that would be the result of your proposal.

116-3 Insofar as Appendix E to the Resource Management Plan purports to be an environmental impact statement, I must inform you that in my judgment it is woefully inadequate in assessing the environmental and human consequences of the proposed designation. There is absolutely no consideration of the real environmental effects that such a designation would have on the San Luis Valley, and I must ask you to abandon your efforts to designate this reach of the Rio Grande at this time.

This is not to say that it would not be appropriate for you to exercise control over the area as a special resource management area which would focus on land use issues rather than on stream flow which has such a strong and adverse impact on water use within our state. Thank you very much for your consideration.

Very truly yours,

Lewis H. Entz

Lewis Entz

cc: Governor Roy Romer
Senator Tim Wirth
Senator Bill Armstrong
Representative Ben Campbell
John Sayre, Assistant Secretary of the Interior
Dr. Jeris A. Danielson, State Engineer
J. William McDonald, Director, Colorado Water Conservation Board
David W. Robbins
Lynn Kopfman, President, Rio Grande Water Conservation District

(217CB)

12/89

Dave Taliaferro
Bureau of Land Management
Canon City District
POB 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro,

117-1 I am writing to make known my support of the Natural Resource Enhancement Management Plan as the appropriate river management plan for the San Luis Resource Area in Southern Colorado. My
117-2 concern is that wildlife protection, with goals to acquire scenic or protective easements on the east side of the river, be included in the RMP.

117-3 As noted in the RMP, excessive or untimely recreational use on the Upper Rio Grande Box has created pressures on the raptor and water fowl population. Without regulation of the recreational boating season, permanent harm will result to wildlife populations.

117-4 The reach of the Rio Grande between Lobatos Bridge and the New Mexico state line should be administered as if it were Wild & Scenic, and BLM should support Wild & Scenic designation by congress.

Sincerely,

Mary Beth Peters

Mary Beth Peters
PO Box 289
Arroyo Hondo, NM
87513

118

TOWN OF DEL NORTE

P.O. Box M

Del Norte, Colorado 81132

(719) 657-2706

December 22, 1989

Mr. David Taliaferro
RMP Team Leader
Bureau of Land Management
Canon City District Office
P.O. Box 1171
Canon City, Co 81212

RE: Comments on the Draft San Luis Resource Management Plan and Environmental Impact Statement

Dear Mr. Taliaferro:

We are writing to express our concern with the portion of the above-referenced plan which proposes to designate the Rio Grande near the Colorado-New Mexico state line as a wild and scenic river under the National Wild and Scenic River System. We strongly encourage you NOT to designate the Rio Grande for the following reasons:

-1 1. The Rio Grande in that reach could hardly be described as "free-flowing." While there are no dams in this area, the source of the water for much of the year comes from irrigation return flows from lands in the San Luis Valley because the waters of the Rio Grande within the San Luis Valley are, in many years, totally utilized all summer by irrigation diversions and municipal users with no water available to the lower reach of the river. Any effort to "restore" this stretch of the river would have significant adverse consequences on the San Luis Valley.

-2 2. The water which is delivered through this reach of the river occurs as the result of administration for the Rio Grande Compact and not because the river is in a "natural" condition. It is essential that the State of Colorado and the water users in the San LUis Valley have freedom to administer the existing water rights under the Rio Grade Compact. Any effort to "restore" the Rio Grande will inevitably place limitation on Colorado's ability to utilize its compact-apportioned share of the river's flow.

8-3 3. The Rio Grande and Conejos Rivers and tributaries thereto are grossly over-appropriated and there are substantially greater legal rights to the use of water in most years than there is water in the stream.

-4 4. The establishment of a wild and scenic river in this

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Mr. Taliaferro
Page 2
December 22, 1989

reach would create a reserved water right which the federal management agency would then have the ability to utilize to frustrate changes in water rights and improved water use efficiency within the San Luis Valley. This in turn would cause enormous expense to our citizens.

118-5 5. The Rio Grande below the Colorado state line is already designated as a wild river and this short segment in Colorado is unnecessary to protect the river within New Mexico.

118-6 6. There is a suggestion in the referenced plan that the administrative control over the river would be placed in the hands of the Taos Resource Management area, a situation which we find to be unacceptable.

118-7 7. Over half of the land along the river corridor proposed for designation is in private ownership and we specifically resist the concept that the federal government would come in and force land use controls and restrictions on private land owners.

118-8 8. The Wild and Scenic Rivers Act allows your agency to condemn private land if the river is designated. We strongly resist a designation which would then permit the condemnation of private property.

118-9 9. This river should not be managed solely for the benefit of a few floaters. It does not have the requisite outstanding remarkable values to justify its inclusion.

118-10 10. The management of this river can be accomplished just as well through a special resource management area which would protect the existing values but would not impose the onerous burdens and restrictions on the citizens of the San Luis Valley that a national wild and scenic river would impose.

118-11 11. The draft resource management plan establishes that the proposed designation of the Rio Grande would have no economic benefit to our region and we see no reason to impose these new restrictions without any benefits.

118-12 12. We believe that the Rio Grande River Study Report, Appendix E to the referenced document, is wholly inadequate. It ignores existing water use and water quality data. It draws conclusions which are unwarranted by the facts and it fails to consider the bulk of the impacts to both the natural and human environments within the San Luis Valley.

118-13 We respectfully request that the Bureau of Land Management withdraw its recommendation to designate the Rio Grande above the Colorado-New Mexico state line as a wild and scenic river and

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Mr. Taliaferro
Page 3
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instead manage the area pursuant to special management status.

Very truly yours,

Barney B. Black

Barney B. Black, MAYOR

BBB/pm
xc: Trustees
file

119

THE RIO GRANDE WATER USERS ASSN.

[illegible] NORTH [illegible] STREET

MONTE VISTA, COLORADO

December 21, 1989

Mr. David Taliaferro
RMP Team Leader
Bureau of Land Management
Cañon City District Office
P. O. Box 1171
Cañon City, Colorado 81212

Re: Comments on Draft San Luis Resource Management Plan and Environmental Impact Statement

Dear Mr. Taliaferro:

The Rio Grande Water Users Association (the Water Users) submits these comments regarding the draft San Luis Resource Management Plan and Environmental Impact Statement published in September, 1989.

The Water Users represent all the major diverters of water from the Rio Grande mainstem in Colorado. The ditches, canals and reservoirs owned and operated by these water users supply necessary irrigation water to over 300,000 acres of productive lands in the San Luis Valley. The water supply available to these lands is, in dry cycles, insufficient to maintain the irrigation requirements of the acreage irrigated. Additional new water management plans and storage vessels are needed in order to sustain the existing economy of the San Luis Valley. Flexibility in the mode of use of existing water rights and facilities is therefore an imperative for the people of the Valley. The proposal to create a Wild and Scenic River, pursuant to federal law, on the lowest reach of the Rio Grande in Colorado, threatens the environment on which the Water Users depend.

A study now issued in draft form by the Colorado Water Conservation Board and sponsored by the San Luis Valley Water Conservancy District shows that further use and development, by upstream storage, of Rio Grande water is available to the people of the San Luis Valley under and in compliance with the terms of the Rio Grande Compact. The Compact mandates deliveries of certain portions of the flow of the Rio Grande to New Mexico and Texas. Those requirements vary according to the variable flow of the river in each year. The Compact also secures to the water users of

119-1 Colorado the right to a share of the river flow. Creation of a Wild and Scenic River at the State Line and the reach above the

Mr. David Taliaferro
December 21, 1989
Page 2

State Line, as called for in the referenced Study, will prohibit that allowance for further development promised to Colorado by the downstream states and by the Federal Government when all of those entities ratified and approved the Rio Grande Compact. This results from the provisions of 16 U.S.C. 1284 (c), which creates a federal reserved water right for wild and scenic river purposes, and thus prevents the further use, change, development, modification, and initiation of new management practices of this basic water resource. In 1948 for example, the Compact would have allowed the upstream storage of a further 75,000 a.f. of water.

119-2 Nowhere in the Study was there the slightest consideration of the impacts on the human environment of these obvious consequences of the proposed federal action. We therefore believe that the draft EIS is hopelessly inadequate. We further believe that the BLM has thus failed its statutory responsibility. It should start anew, and offer full opportunity for participation by the Water Users and full consideration of the water consequences of the proposed Wild and Scenic River.

119-3 The Study, under the most strained favorable construction, considers only impacts within the reach of the proposed Wild and Scenic Designation. Yet the consequences of creation of a Wild and Scenic River operate on the human environment on all upstream river uses. The Study is therefore plainly inadequate under the law.

119-4 The Rio Grande at the State Line has been recorded as a no-flow river. According to the United States Geological Survey Water Data Reports for the Rio Grande Basin, flows near Lobatos, Colorado [a point within the reach of the Rio Grande studied] were zero for extended periods of days in 1950-51, and in 1956. The Rio Grande, below Alamosa, is as far from a free-flowing natural river as exists in the West. Further, we challenge the notion that the River, in this reach, can be "restored to its free-flowing condition", as required by statute for inclusion, without devastation to historical and existing conditions. Nowhere does the draft

119-5 EIS discuss the consequences or even the plan you may have for such "restoration". We therefore believe that the Rio Grande simply does not qualify for inclusion as a Wild and Scenic River under the statutory criteria.

119-6 Your suggestion of use of Closed Basin flows is also unsound. The BLM has no right to affect the mode of operation of the Closed Basin Project. Its yield is variable. Its mode of operation is fixed by law, and delegated to an operations committee for implementation of that law.

Mr. David Taliaferro
December 21, 1989
Page 3

119-7 The Study makes no analysis whatsoever of the quality issues associated with a designation of a Wild and Scenic River. Since the Rio Grande in this reach is generally a river composed largely (and in some seasons almost exclusively) of return flows from agricultural and municipal uses, the Study is hopelessly flawed by this omission. The potential costs of quality improvements on the victims upstream is simply ignored. This is wrong, and fails to meet the requirements of law for an EIS.

119-8 Finally, we believe that this reach of the Rio Grande was previously studied for inclusion as a Wild and Scenic River at the time that a segment of the River in New Mexico was so designated. The result of that previous study was the federal decision to drop efforts for inclusion of the Colorado segment. This decision should be controlling of your actions now.

Please start over. You made hopeless mistakes, and have produced a terribly flawed and inadequate document.

Finally, we adopt the additional points made in the statement filed with you by the Rio Grande Water Conservation District.

Sincerely yours,

Bill V. Kopfman
Bill V. Kopfman
President,
Rio Grande Water Users Association

cc: John U. Carlson, Esq.

12/20 89

Dave Taliaferro
BLM Cañon City District
Cañon City, Colorado

Dear Mr Taliaferro,

The San Luis Resource Area in Southern Colorado is an important bit of wild country.

I enjoy river rafting — but the enjoyment of a wild river is spoiled by too many people.

120-1 Please consider designating the reach of the Rio Grande between Lobatos Bridge and the N.M. State line as a Special Resource Management area, administered as if it were Wild and Scenic, — with equal emphasis on wildlife protection and recreation: The Natural Resource Enhancement Management Plan.

This is the plan recommended by Angus Brown — and I hope you'll consider it seriously, in behalf of all of us who love the natural wonders of the Rio Grande.

Yours Sincerely
William S. Carlisle

Telluride Institute
Fostering community & culture from the high mountain West

December 1989

To: Dave Taliaferro

This brief letter is an effort to express concern over the future management plan for the Rio Grande in the San Luis Valley, specifically the 41.2 miles north of the Colorado-New Mexico

121-1 border. We would like to express support for the Natural Resource Enhancement Alternative, outlined in the Draft Resource Management

121-2 Plan. We would favor National Wild and Scenic protection for that section, along with other sections of the Rio Grande in Colorado. In this time of dwindling resources, growing population and pollution, it is critical that we look at our natural resources, especially our rivers, as resources that need to be enhanced and preserved in any way possible. If we continue to use resources with little regard for sustainable use and future generations, we will see degradation of our resources to the point that they will be difficult to repair. We are not in support of the Preferred Alternative or any of the other alternatives outlined in the RMP.

Sincerely,

Leigh Sullivan

Board of Trustees: Patricia Aburdene, John Cluse, John Lifton, Amory B. Lovins, L. Hunter Lovins, John Naisbitt, Pamela Zoline
Box 1770, Telluride, Colorado 81435, USA — tel: (303) 728-4981 & (303) 728-4402 A Colorado non-profit corporation

122

CONEJOS WATER CONSERVANCY DISTRICT
3[illegible] STREET
P. O. BOX 40
MANASSA, COLORADO 81141

December 13, 1989

Mr. David Taliaferro
RMP Team Leader
Bureau of Land Management
Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Re: Comments on the Draft San Luis Resource Management Plan and Environmental Impact Statement

Dear Mr. Taliaferro:

We are writing to express our concern with the portion of the above-referenced plan which proposes to designate the Rio Grande near the Colorado-New Mexico stateline as a wild and scenic river under the National Wild and Scenic River System. We strongly encourage you not to designate the Rio Grande for the following reasons:

2-1 1. The Rio Grande in that reach could hardly be described as "free-flowing." While there are no dams in this area, the source of the water for much of the year comes from irrigation return flows from lands in the San Luis Valley because the waters of the Rio Grande within the San Luis Valley are, in many years, totally utilized all summer by irrigation diversions and municipal users with no water available to the lower reach of the river. Any effort to "restore" this stretch of the river would have significant adverse consequences on the San Luis Valley. You have failed to consider this situation in your analysis.

2-2 2. The water which is delivered through this reach of the river occurs as the result of administration for the Rio Grande Compact and not because the river is in a "natural" condition. It is essential that the State of Colorado and the water users in the San Luis Valley have freedom to administer the existing water rights under the Rio Grande Compact. Any effort to "restore" the Rio Grande will inevitably place limitations on Colorado's

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Mr. Taliaferro
Page 2
December 13, 1989

ability to utilize its compact-apportioned share of the river's flow.

122-3 3. The Rio Grande and Conejos Rivers and tributaries thereto are grossly over-appropriated and there are substantially greater legal rights to the use of water in most years than there is water in the stream.

122-4 4. The establishment of a wild and scenic river in this reach would create a reserved water right which the federal management agency would then have the ability to utilize to frustrate changes in water rights and improved water use efficiency within the San Luis Valley. This in turn would cause enormous expense to our citizens.

122-5 5. The Rio Grande below the Colorado stateline is already designated as a wild river and this short segment in Colorado is unnecessary to protect the river within New Mexico.

122-6 6. There is a suggestion in the referenced plan that the administrative control over the river would be placed in the hands of the Taos Resource Management Area, a situation which we find to be unacceptable.

122-7 7. Over half of the land along the river corridor proposed for designation is in private ownership and we specifically resist the concept that the federal government would come in and force land use controls and restrictions on private land owners.

122-8 8. The Wild and Scenic Rivers Act allows your agency to condemn private land if the river is designated. We strongly resist a designation which would then permit the condemnation of private property.

122-9 9. This river should not be managed solely for the benefit of a few floaters. It does not have the requisite outstanding remarkable values to justify its inclusion.

122-10 10. The management of this river can be accomplished just as well through a special resource management area which would protect the existing values but would not impose the onerous burdens and restrictions on the citizens of the San Luis Valley that a national wild and scenic river would impose.

122-11 11. The draft resource management plan establishes that the proposed designation of the Rio Grande would have no economic benefit to our region and we see no reason to impose these new restrictions without any benefits.

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Mr. Taliaferro
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December 13, 1989

-12 12. We believe that the Rio Grande River Study Report, Appendix E to the referenced document, is wholly inadequate. It ignores existing water use and water quality data. It draws conclusions which are unwarranted by the facts and it fails to consider the bulk of the impacts to both the natural and human environments within the San Luis Valley.

-13 We respectfully request that the Bureau of Land Management withdraw its recommendation to designate the Rio Grande above the Colorado-New Mexico stateline as a wild and scenic river and instead manage the area pursuant to special management status.

Very truly yours,

Kelly Lowrie — PRESIDENT

CONEJOS WATER CONSERVANCY DISTRICT

123

1860 Lincoln Street, Suite 404 • Denver, Colorado 80295
303/860-0099

December 21, 1989

Mr. Dave Taliaferro
RMP Team Leader
Cañon City District
Bureau of Land Management
P. O. Box 1171
Canõn City, CO 81212

Dear Mr. Taliaferro:

On behalf of the Rocky Mountain Oil & Gas Association (RMOGA), I appreciate this opportunity to provide the BLM with comments on the Draft San Luis Resource Management Plan and Environmental Impact Statement. As you know, RMOGA is a trade association representing hundreds of members who account for more than 90% of the oil and gas exploration, production and transportation activities in the Rocky Mountain West. Therefore, we have a vital interest in how the BLM intends to manage its lands in conjunction with oil and gas activities.

We would like to commend the BLM on its preparation of a concise, yet comprehensive, Resource Management Plan. Obviously, we would prefer that the BLM adopt the Resource Production Alternative because it would provide an increase in oil and gas exploration and development opportunities over what currently exists in the area. Nevertheless, the Preferred Alternative appears
123-1 to constitute a good mix of uses while still allowing for reasonable access to explore for and produce energy resources. There are, however, a couple of issues which require discussion.

123-2 First, we request that BLM clarify and incorporate in the final planning documents the rationale for leasing bighorn sheep lambing range with a strict no surface occupancy requirement. It would seem that a timing limitation would provide adequate protection for this sensitive resource without having to resort to a preclusion of all activitiy on a year-round basis. There may also be other types of mitigation measures available which would suffice to safeguard the lambing range.

123-3 Second, we strongly recommend that a map be included in the final planning documents and Record of Decision which displays where the various lease stipulations will be applied. We are aware that the planning documents contain

December 21, 1989

Mr. Dave Taliaferro
RMP Team Leader
Cañon City District
Bureau of Land Management

page two

maps showing the location of the resources found in the San Luis Resource Area, but it is not clearly indicated where stipulations will be utilized. Such information is extremely useful to companies when they are considering future activities in the area. Members of the public would undoubtedly also find this information useful, and it would likely help reduce the public's confusion when activities are proposed on a lease in the future. A page-sized map would serve the purpose of disclosing this important information.

Again, we appreciate the opportunity to provide you with our views and recommendation. If you would like to discuss our comments in further detail, please contact me.

Sincerely,

Alice Frell Benitez
Public Lands Director

AFB:cw

CITY of MONTE VISTA

December 22, 1989

Mr. David Taliaferro
RMP Team Leader
Bureau of Land Management
PO Box 1171
Cañon City, CO 81212

Dear Mr. Taliaferro:

124-1 This letter is being written on behalf of the City of Monte Vista to serio question the proposal to designate the lower portion of the Rio Grande River Colorado as Wild and Scenic under the National Wild and Scenic River System.

124-2 First, we question its eligibility as envisioned by Congress in their declara of policy, stating that "certain rivers be selected which possess outstan remarkable scenic, recreational, geographical, fish and wildlife, historic, other similar values". While many of these criteria are a value as seen by eyes of the beholder, we feel that the pricipal reason this area lacks develop is that it lacks these attracting values.

124-3 Secondly, one of the prinicpal reasons the Wild and Scenic River Act was prop for passage by Congress was to deter the building of river dams. Since the us water in the Rio Grande is so tied up by water rights, the Rio Grande Compact, the Closed Basin Project, we seriously doubt that dam building should be a re to put it under protection.

124-4 Next, since our first two points indicate a lack of need for protection, we do feel that the expense of designating and later administering the river as wild scenic is a justified use of public money. We further feel that pla additional regulation on this river and its waters will only further compli the rights and uses of the water by the people in the San Luis Valley, resul in litigation to try to settle differences.

124-5 We therefore respectfully request that you withdraw your recommendation to inc this portion of the Rio Grande River in the Wild and Scenic River System.

Thank you for the opportunity to respond to the proposal.

Sincerely,

Ronald R. Schulz

Ronald Schulz, Mayor
City of Monte Vista

cc: Rio Grande Water Conservation District

RS/jl

December 22, 1989

125

I welcome this opportunity to comment on the San Luis Resource Management Plan.

The BLM has been by tradition the government agency that most mismanaged its lands. Driving on back roads one could almost always spot BLM grassland; it was the area that was over grazed and in some cases eroded. The throwaway areas. I was elated in learning the new direction the BLM is taking toward responsible management at the Colorado Enviromental Coalition Conference. It would have been wonderful to have been on the CEC tour in August. Kirk Koepsel's slides were of great help because I have not had the opportuntiy to visit many of the ACEC sites.

Please consider the following comments in your final plan:

125-1 * Be most cautious in oil and gas leasing. The rape of the Valley is in full swing by both public and private entities. As a native Coloradoan I have seen much destruction and expense all in the name of oil and gas production. There is also the problem of the boom and bust syndrome as seen on the Western slope. There should be no leasing in the following areas: Trickle Mountain, San Luis Hills, Flattop, Sand Castle, Los Mogotes, Blanca Wildlife Area, Elephant Rocks and Bishop Rock. Particular care should be given to the Cumbres and Toltec Railroad corridor and the Rio Grande River corridor. The railroad brings much pleasure to the train passengers and money to the state. Both could be diminished if mineral leasing and production are allowed. Before viewing Kirk's slides I had no idea the Rio Grande was so beautiful. I thought the whole river looked like it does around Alamosa. The river needs all the protection it can get! And because cultural sites are being destroyed in the Valley, no leasing should be allowed in these areas.

125-2 * Although we own a jeep and love the backroads we can take with it, I know that not all ORV owners give much thought to where they are driving. For this reason, I feel there should be no off road vehicle recreation area in the Cattleguard-Sand Castle location. Also consider an additional land acquisition, including Indian Spring and the remainder of the Cattleguard dig site. Our heritage must be preserved. Once it is gone it is gone. We can't go to K-Mart and buy more.

125-3 * On the matter of grazing on public lands. Frankly, I don't think there should be any, period. I hate it when a ranch is offered up for sale and then lists X-number of acres of public grazing land as part of the ranch. A rancher in our area who has no public grazing rights, told me recently that he figures he is down $40.00 at market time for every cow he sells from those subsidized by grazing on public land. This is the free enterprise system? Because I know there will continue to be private profit from grazing on public lands, please introduce strong protection for riparian areas into the management plan.

125-4 * No Taos 345 kv powerline, you know the arguments.

125-5 * Now to the mighty Rio Grande River, all 41.5 miles studied by the BLM should receive Wild and Scenic designation and should have a wide protective corridor. The Rio Grande is an abused river, the BLM can correct this condition for a few miles.

Thank you for this opportunity to comment on the future of the BLM lands in the San Luis Valley. Remember this is your legacy. Will it be one of careful management or of abuse?

Eleanor C. Mueller
P.O. Box 93, Lot 191 Vista Cascade
Crestone, Co 81131

Public Service

Public Service
Company of Colorad
P.O. box 840
Denver, CO 80201-0

December 19, 1989

Mr. Dave Taliaferro, RMP Team Leader
Bureau of Land Management
Canon City District
P.O. Box 2200
Canon City, CO 81215-2200

Dear Dave:

Public Service Company of Colorado appreciates the opportunity to review and comment on the draft Resource Management Plan for the San Luis Resource Area. As you know, Public Service is a primary supplier of electricity and natural gas to the residents and industry in the San Luis Valley and has vital interest in the economic welfare of the Valley. The Company, while sensitive to the environmental concerns expressed in the DRMP, wants to be sure that the economic well being of the residents of the Valley is ensured and may be enhanced in the future. It is from this perspective that Public Service offers the following comments on the DRMP.

Public Service Company supports the Preferred Alternative for management of the San Luis Resource Area with the following exception:

126-1 The proposed wild and scenic and other designations for the Rio Grande River corridor will preclude the development of utility facilities along this corridor which has for some time been identified as the most logical route for linear facilities in and out of the Valley to the south. The continued economic development of the San Luis Valley will depend, to a great extent, on the availability of utility services (gas, electric and water) which originate elsewhere. Adequate linear corridors will be necessary to plan for and ultimately deliver these services to the Valley.

126-2 If the Rio Grande corridor is to be closed to utility development, an alternative corridor to the south should be made available in the plan. Public Service suggests that a corridor be designated along the western side of the San Luis Hills and the Flattops ACECs.

Because of the variety of utilities that may occupy the corridor, the corridor should be designated as open to utility development and should be wide enough to provide for the safe operation and reliability of the occupying facilities and allow room for alignment to avoid impacts to sensitive resources. The corridor should also be wide enough to allow alternative routes where linear facilities enter and exit private lands.

From previous discussions, I believe that such a corridor can be designated along the west side of the San Luis Hills without significant impact to the resources present or their management. I have enclosed a map showing the general area for your reference.

Public Service Company respectfully requests that you consider this addition in the final Resource Management Plan as a substitute for the original corridor along the Rio Grande River which was approved in the Record of Decision for the San Luis - Taos 345 kv Electric Transmission Line.

Very truly yours,

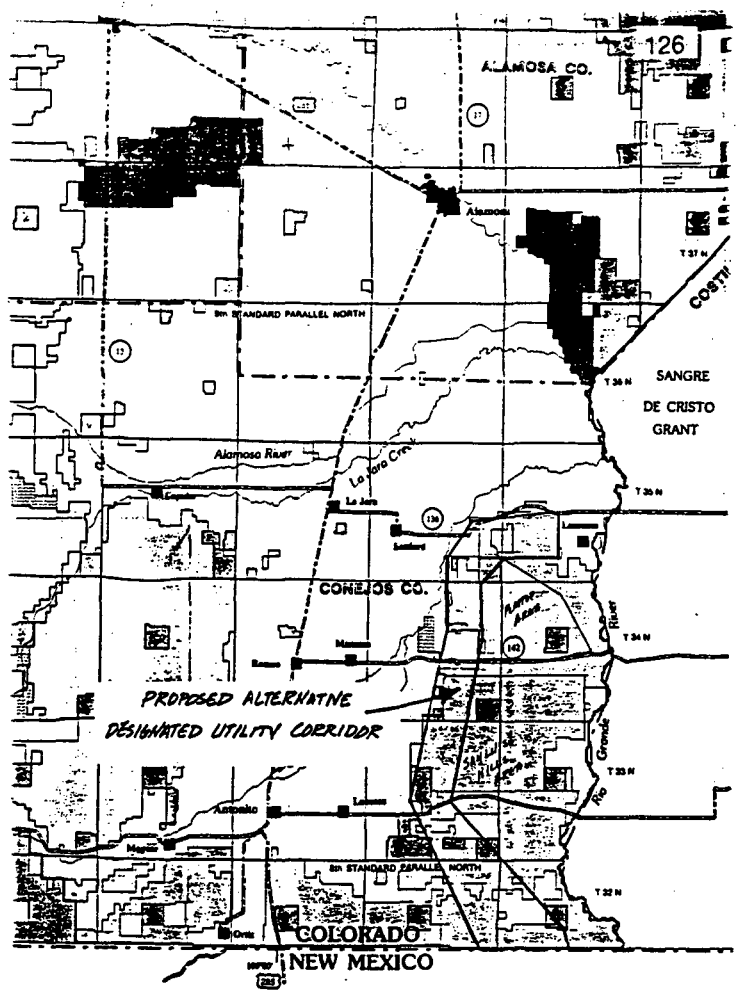
John W. Steck

John W. Steck
Permits & Land Use Coordinator

JWS:lc

Enclosure

cc: John Hodgins, CSO
Dennis Zachman, San Luis Resource Area



American Rivers

December 20, 1989

Dave Taliaferro, RMP Team Leader
San Luis Resource Management Area
Bureau of Land Management
Canon City District Office
Post Office Box 1171
Canon City, Colorado 81212

Re: Draft San Luis Resource Management Plan and Environment Impact Statement

Dear Mr. Taliaferro:

American Rivers is a national, public interest not-for-profit corporation with more than 12,000 members nationwide, including many members who use and enjoy the resources of the San Luis Resource Management Area. American Rivers is the only national conservation organization dedicated exclusively to the preservation of free-flowing rivers. In our sixteen-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 federal agencies in planning for the river resources on the lands they administer. We have assisted the planning staff of the Bureau of Land Management ("BLM") in Washington to clarify administrative direction for consideration of potential wild and scenic rivers in BLM's resource management planning, and have reviewed, commented on, and protested numerous BLM plans. We have worked similarly with the U.S. Forest Service in developing administrative direction for the evaluation and management of potential wild and scenic rivers on the National Forests, and reviewed, commented on, and appealed numerous land and resource management plans issued by that agency.

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

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(202) 547-6900

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 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.

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.

127-1 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 more detailed recreation area management plans or project plans. Guidelines, Section IV.C., at p. 7, Section IX, at p. 20. As a substantive decision regarding the appropriate management of a sensitive area, the planners' decision regarding suitability must be accompanied by environmental analysis pursuant to the National Environmental Policy Act ("NEPA"). Guidelines, Section VIII.B. at p. 15-16.

A common failing of many plans is that the initial screening of eligible rivers focuses solely upon rivers listed by the National Park Service on their Nationwide Rivers Inventory ("NRI"). The BLM is not limited to an assessment merely of those rivers listed on the NRI. Although the NRI provides a "primary database," the Guidelines state that "[l]isting on the NRI is not confirmation of eligibility, and absence from the NRI does not necessarily indicate noneligibility." Guidelines, Section V.C.1.

Moreover, as BLM planners in other resource areas and forest planners on National Forests have frequently found, the NRI is far from a complete and reliable listing of potentially eligible wild and scenic rivers. The NRI's listing is sharply limited by its use of a non-statutory length requirement of 25 miles for river segments and its adoption of a screen for streamside development that excluded recreational segments, which may contain substantial evidence of human use, altogether. The NRI did not include rivers in Alaska or Montana. Further, as a very practical manner, budget constraints precluded a comprehensive examination of western streams. For the BLM to fully carry out its responsibility for river planning and assessment, it must take its own hard look at the streams and rivers on its lands. The BLM bears ultimate responsibility for the protection of the resources on its lands; moreover, the BLM staff, at the resource area and district level, possess tremendous knowledge concerning those resources.

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: "[T]he 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.

The Draft San Luis RMP fails to comply with administrative guidance to examine rivers other than the Rio Grande.

127-2 The Draft San Luis RMP indicates the planners did not examine any potential wild and scenic rivers other than the Rio Grande. Other candidate rivers within the RMP may include Black Canyon, South Piney Creek and Zapata Creek, each of which are within wilderness study areas adjacent to the Rio Grande National Forest. See RMP at 2-42. The BLM should document the values of these streams and, if outstandingly remarkable values are present, coordinate an eligibility study of these streams with

127-3 the Forest Service. The Rock Creek and Dry Creek system appears to be a river which may qualify for inclusion in the national rivers system. The RMP documents significant cultural and archaeological resources in this area, as well as the unique scenic values associated with Bishop Rock. Id. at 2-44. Ford Creek appears also to be a potential candidate for further assessment. See Appendix H, "Areas of Special Concern," at H-4

127-4 (area has potential vegetation and wildlife research; crucial winter area for big game species; high scenic and recreation qualities).[1] The presence of a candidate T&E plant suggests

127-5 that Rajadero Canyon may possess outstandingly remarkable ecological values. Id. at H-9.

American Rivers commends the San Luis planners for their attention to and concern for the Rio Grande River Study Report. See RMP, Appendix E. The report documents well the planners concern for the resource. Among many other fine elements of the study, we believe the planers have classified appropriately Segment C. However, the study report is flawed in several significant areas. Certain other aspects of the report are confusing.

First, our principal concern is with the "Analysis and Evaluation" section. The planners do not seem to understand the distinction between "recreational" use and a "recreational" classification. For example, the planners have apparently decided, based upon the opinion of the Alamosa Refuge manager,

127-6 that a "recreational" designation is not compatible with the wildlife refuge. Id. at E-10. A river is eligible for inclusion in the national rivers system if it possesses one or more outstandingly remarkable values. One such value is recreation; another is fish and wildlife values. If, for example, that section of the river which flows through the refuge possesses outstandingly remarkable fish and wildlife values, then it is eligible for inclusion in the national system. The next step is to determine the appropriate classification for the river, based upon existing streamside development. The appropriate criteria for determining such classification, as discussed above, are set forth in the Interagency Guidelines and the Guidelines. It may be that due to existing streamside development, the appropriate classification for this segment of the river is recreational, however, such a classification does not imply that the river is to be managed for recreational purposes. Rather, the river segment should be managed to protect and enhance the

[1] The RMP does not differentiate between the values which may be present in the river corridor or beyond the corridor.

outstandingly remarkable values present within the river corridor. It may well be that appropriate management of a river which possesses outstandingly remarkable fish and wildlife values and that, due to existing streamside development, is classified as recreational, would restrict recreational use. At the present time, for example, the United States Fish and Wildlife Service, administers 6 wild and scenic rivers in Alaska. Management plans insure that recreational use is compatible with the purposes of the refuge. At the same time, the river and its corridor are protected from inappropriate development otherwise permitted within the refuge.

Similarly, the study states that Segments A and B do not meet the "eligibility requirements for wild, scenic, or recreation designation." Id. at E-11. The next several sentences describe criteria that are relevant to classification, i.e., shoreline development, but that are absolutely irrelevant to a determination of the river's eligibility. Apparently, these river segments do not qualify for either wild or scenic classification. If that is the case, the appropriate

127-7 classification if recreational. The planners, however, state that since the river recreational values "are not considered to be remarkable, mainly because of the lack of a unique physical river setting," the river lacks the "outstandingly remarkable recreation values required for a recreation classification." Id. The planners are simply mistaken in this conclusion. Outstandingly remarkable recreational values are not required for a river to be classified as recreational. Further, it would appear that Segment B at least receives substantial recreational

127-8 use. See id. at E-12 and Table E-1. American Rivers suggests that when the planners revise the study, they reconsider whether the recreational use of Segment B (and A), particularly when combined with the recreational opportunities of the river downstream, qualify as outstandingly remarkable.

Second, the report states that the 41.5 miles of the river study area have been identified as a potential ACEC and as possessing some special cultural characteristics. RMP, Appendix E at E-1.

127-9 It would be helpful to identify which particular resource values were identified in relation to the ACEC designation. The Final RMP should identify with particularity those outstandingly remarkable values present in each identified river or river segment.

Third, although the study identifies the length of the river

27-10 segment that is studied, the width of the corridor is never explicitly identified. E.g., id. at E-3. Agency direction provides that the appropriate corridor for purposes of the study is one-quarter mile wide on each side of the river. The apparent

failure to identify those outstandingly remarkable values within one-quarter mile of the river must be corrected.

127-11 Fourth, the study should identify the resource values present in each segment to determine whether the segment possesses outstandingly remarkable values. The study fails to do this. For example, the section of the study titled "Physical Description" identifies the "significant cultural value[s]" and paleontological values possessed by Segment A. Id. at E-4. These descriptions suggest the river segment may be eligible for wild and scenic classification on the basis of these values alone.

127-12 The scenery of this segment appears to be very high. Id. In addition, the fish and wildlife values present in this area, including bald and golden eagles, appear to be very high. Id.

127-13 The description of Segment B suggests it also possesses outstandingly remarkable scenic, recreational and fish and wildlife values. Id. Segment C appears to possess outstandingly

127-14 remarkable scenic, fish and wildlife, and recreational values. Id. The geologic values of the area also appear to qualify it for the national system. Id. at E-10.

Fifth, we commend the planners objective to provide "[n]onimpairment interim management" for the river corridor. However, the RMP should provide particular management prescriptions designed to protect the resource values and

127-15 character of the river 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).

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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Mr. Dave Taliaferro
December 20, 1989
Page 7

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.

We trust these comments are helpful during the Resource Management Plan process. We look forward to participating further in the RMP process. If you have any questions concerning any of the matters set forth above, please do not hesitate to communicate with me.

Very truly yours,

Thomas J. Cassidy, Jr.
Public Lands Counsel

cc: Robert G. Dreher, Esq., Sierra Club Legal Defense Fund

128

ROY ROMER
Governor

STATE OF COLORADO 1876

JERIS A. DANIELSON
State Engineer

OFFICE OF THE STATE ENGINEER
DIVISION OF WATER RESOURCES

1313 Sherman Street-Room 818
Denver, Colorado 80203
(303) 866-3581

December 20, 1989

Mr. Dave Taliaferro
RMP Team Leader, BLM
Canon City District Office
P.O. Box 1171
Canon City, CO 81212

SUBJECT: Comments on the September, 1989 Draft San Luis Resource Management Plan/Environmental Impact Statement (DRMP/EIS)

Dear Mr. Taliaferro:

As State Engineer of Colorado, I am directly responsible, by statute, for the efficient and effective administration of both surface and groundwater in the state. I am also the Colorado Commissioner on the Rio Grande Compact.

The Compact apportions the water of the Rio Grande between the states of Colorado, New Mexico, Texas and the Republic of Mexico. This Compact was signed by the states, passed by Congress as Public Act #96, 76th Congress and signed by the President on May 31, 1939.

Over 50 years have passed since the signing of the Compact and Colorado has adhered to the provisions of the Compact. I note, with interest and some concern, portions of the DRMP/EIS that would directly conflict with existing water resource practice dictated by state and federal legislation. Specifically, the following comments are offered for your consideration.

128-1 1. Page 3-3 contains the following language, "Legal rights would be acquired to use water in support of BLM programs.." We assume the water court process will be followed.

128-2 2. Page 3-4, "It is the policy of BLM to protect, maintain, restore and/or enhance the quality of waters on public lands." Depending on what is meant by this statement, it might very well impact the administration of water rights, the Rio Grande Compact, and the operation of the Closed Basin Project. Any attempt to change the current processes and administration would have to be done in cooperation with all affected agencies and users.

128-3 3. The listed preferred alternative includes the recommendation of wild and scenic river designation for a portion of the Rio Grande near the stateline, and with this concept, the establishment of minimum

128

Mr. Dave Taliaferro
December 20, 1989

Page 2

streamflows for recreation and fisheries. The establishment of minimum streamflows would impact the operation of the Closed Basin Project, Platoro Reservoir, or any other future project. The development of the Closed Basin Project was intended to assist Colorado in meeting its Compact deliveries to Mexico.

128-4 4. Page C-1 addresses BLM wetland areas. In particular, the Emperius area wherein the remarks section "Closed Basin Project has water rights capable of 950 acres." This is not understood as the known situation on the Emperius tract. There are a number of small stock and irrigation wells on the tract. Any attempt to expand the legal use of those wells must be done through Water Court and not at the discretion of the BLM. Also, there is a great need for the BLM to continue efforts to resolve the issue of illegal wells and expanded use on the Blanca WHA.

128-5 In summary, from a water administration viewpoint, I see two issues raised in the DRMP/EIS. First is the use of Closed Basin groundwater for wetlands and habitat areas. The adjudicated pre-1979 wells pose no problem; however, the assumption of use for the existing illegal wells may be premature. The issue of augmenting the post-1979 wells could be difficult to solve.

128-6 Second, and of most concern to me, is designating a 6.7 mile segment of the Rio Grande as wild and scenic with a minimum streamflow water right. This could significantly impact the administration of the Rio Grande Compact, the operation of the Closed Basin Project, Platoro Reservoir, and other future projects.

128-7 The Rio Grande is over-appropriated with over 5,000 cfs decreed water rights with priority dates of 1916 or earlier. The Rio Grande is highly regulated and water use is very important to the economy of the basin. There appears to be no benefit to designating the lower reach as wild and scenic.

If you are suggesting that CBP water be used, I am unaware of any proposal or discussion with Rio Grande Water Conservancy District, U.S. Bureau of Reclamation, water users, or the State of Colorado to accomplish this. Until such time as the water issues are resolved, I would not be able to determine the impact on my responsibilities.

Sincerely,

Jeris A. Danielson
State Engineer

JAD/WCM:gla/7098I

cc: Hal Simpson, Deputy State Engineer
Steve Vandiver, Division Engineer

129

12/89

Dave Taliaferro
Bureau of Land Management
Canon City District
POB 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro,

129-1 I am writing to make known my support of the Natural Resource Enhancement Management Plan as the appropriate river management plan for the San Luis Resource Area in Southern Colorado. My concern is that wildlife protection, with goals to acquire scenic

129-2 or protective easements on the east side of the river, be included in the RMP.

129-3 As noted in the RMP, excessive or untimely recreational use on the Upper Rio Grande Box has created pressures on the raptor and water fowl population. Without regulation of the recreational boating season, permanent harm will result to wildlife populations.

129-4 The reach of the Rio Grande between Lobatos Bridge and the New Mexico state line should be administered as if it were Wild & Scenic, and BLM should support Wild & Scenic designation by congress.

Sincerely,

Ken Nelson
Box 200
Tres Piedras, New Mexico
875-77

130

Pl Box 2502
Taos NM 87571
December 21, 1989

Mr. Dave Taliaferro
Bureau of Land Management
Canon City District
Pl Box 1171
Canon City, Co 81212

Dear Mr. Taliaferro:

130-1 I would like to encourage the BLM to consider the Natural Resource Enhancement Management plan as a superior solution to river management in the San Luis Resource Area. This plan offers greater protection to wildlife, as well as providing controlled opportunities for recreational use.

As an avid kayaker I am concerned about the impact of people and our "things" on the delicate natural environment.

130-2 I would like to see the Rio Grande between Lobatos Bridge and the NM state line administered as Wild and Scenic, and the BLM should support such a designation by Congress.

Sincerely,
Carol Wildman

131

New Mexico
River Outfitters Association

12/22/89

Dave Taliaferro, RMP Team Leader
BLM, Canon City District
Box 1171
Canon City, Colorado 81212

Dear Dave:

131-1 The New Mexico River Outfitters Association concurs with the finding of the Draft Resource Management Plan and EIS that Segment C of the Rio Grande River, from Lobatos Bridge to the State line, should be added to the National Wild and Scenic River System, so as to better protect the entirety of the Rio Grande Gorge and the outstanding wilderness and recreation values located therein.

131-2 Additionally, we urge inclusion of Segments A and B, which are now in relatively unimpacted condition and in a remote area.

Sincerely yours,

Kathy Miller

Kathy Miller, Secretary

P.O. Box 1598 Taos, New Mexico 87571

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Amigos Bravos, Friends of the Wild Rivers
P.O. Box 6168 Taos, New Mexico 87571

December 21, 1989

Mr. Dave Taliaferro
Bureau of Land Management
Canon City District
POB 1171
Canon City, Co. 81212

Dear Mr. Taliaferro,

Amigos Bravos is a broad-based river conservation organization with a specific interest in the Wild and Scenic Rio Grande in northern New Mexico. Since the San Luis DRMP addresses the management of the river immediately north of the NM/CO border, the board of directors of Amigos Bravos has reviewed the DRMP for the San Luis Resource Area and offers the following comments.

132-1 We feel that the Natural Resource Enhancement Alternative is the most appropriate alternative for the management of the 41 mile distance of river under study; and, even this alternative
132-2 provides insufficient riparian protection. Riparian protection is needed for the entire 41 mile segment of the river. However, at least this alternative prescribes some intensive management for segment B.

132-3 The draft RMP states on page E-4 that segment B contains many shared attributes of segment C, which makes it a candidate for inclusion in the Wild and Scenic river system. Such attributes include: the same aquatic population, use of the riparian zone by raptors and wildfowl, and numerous opportunities for an experience of solitude with outstanding scenic vistas. Indeed, the most common intrusion of "civilization" is the presence of cattle.

Wildlife populations do not recognize political or otherwise devised boundaries. Raptors and wildfowl have broad ranges; their ecosystem must be managed as a unit, rather than in rigidly defined river segments. Although nesting sites are not as common in segment B as in C, aquatic life in this river reach is an important food source for area raptors. We recommend intensive wildlife management on all segments, but most especially on B & C.

Section C should be managed as a Wild and Scenic River; official designation as such should be vigorously pursued. The BLM

132

-2-

should push for deletion of the power withdrawal site as soon as possible, as well as for mineral withdrawals in the area. As stated in the draft RMP, scenic easements should be acquired on the east side of the river. In addition, the BLM should strive to reach an agreement with Costilla County which will include the closure of the subdivision road network which provides easy-access to the east rim. Such easy-access plays a primary role in creating an opportunity for the devastating poaching which has occurred in the area to take place.

132-4 Studies of raptor and waterfowl nesting habits suggest that recreational floatboating has a disastrous effect on successful population maintenance. Continually increasing recreational use of the Taos Gorge below the Red River confluence has served to push both raptor and wildfowl populations north, into the upper Rio Grande Box Canyon. For this reason, it is of paramount importance that recreation be intensively managed in section C.

132-5 Floatboating should be strictly permitted with closures enforced from mid-March to mid-June, a period defined as critical based on studies by wildlife biologists, (ie. studies done by Ben Kuykendall and Ron Gardiner for the BLM Taos Resource Area). On-site monitoring and permitting at Lobatos Bridge should be maintained through the season. Such monitoring could be achieved by seasonal BLM employees or volunteers who would be responsible for full-time enforcement and public education.

Segment C should be managed in coordination between both San Luis RA and Taos Resource Areas to ensure that the entire Wild and Scenic River has consistency in management goals.

132-6 Segment B is not of as great importance as a nesting area; however, floatboating should be monitored with a self-serve permitting box at County Road 142. This site is also desirable for a primitive camping facility. Segment B should be studied for inclusion into the Wild and Scenic system as a "Scenic" river segment.

132-7 We further recommend that the entire reach studied be included in a proposed National Conservation Area which would focus on the Rio Grande and surrounding wildlife habitat. The NCA would contain a variety of special designations such as ACEC, Scenic, and Wild and Scenic. An NCA proposal takes into account the critical situation of the raptor and wildfowl populations, which are receiving increased pressure from both recreational use and poaching. An NCA may require additional budgeting for education/enforcements, but increased prominence of this unique area as a premiere raptor area will open new avenues of funding resources.

132-8 We commend your efforts to address the protection of this long neglected section of the Rio Grande. We urge that you seriously consider a more intensive RMP than the Preferred alternative.

132

Sincerely,

The Board of Directors, Amigos Bravos

Mary Humphrey, President

cc: American Rivers
American Wildlands
Senator Tim Wirth
Senator Bill Armstrong
Congressman Ben Nighthorse-Campbell
WRGA

133

12/89

Dave Taliaferro
Bureau of Land Management
Canon City District
POB 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro,

133-1 I am writing to make known my support of the Natural Resource Enhancement Management Plan as the appropriate river management plan for the San Luis Resource Area in Southern Colorado. My

133-2 concern is that wildlife protection, with goals to acquire scenic or protective easements on the east side of the river, be included in the RMP.

133-3 As noted in the RMP, excessive or untimely recreational use on the Upper Rio Grande Box has created pressures on the raptor and water fowl population. Without regulation of the recreational boating season, permanent harm will result to wildlife populations.

133-4 The reach of the Rio Grande between Lobatos Bridge and the New Mexico state line should be administered as if it were Wild & Scenic, and BLM should support Wild & Scenic designation by congress.

Sincerely,

Elizabeth Chesley Owen

I do most sincerely believe in wildlife protection — I am an ardent believer in all that you propose! (Rivers as well as wildlife!)

134

ERA TAOS, REALTORS

December 20, 1989

Dave Taliaferro
Bureau of Land Management
Canon City District
P.O. Box 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro,

1 I am writing to make known my support of the Natural Resource Enhancement Management Plan as the appropriate river management plan for the San Luis Resource Area in Southern

-2 Colorado. My concern is that wildlife protection, with goals to acquire scenic or protective easements on the east side of the river, be included in the RMP.

3 As noted in the RMP, excessive or untimely recreational use on the Upper Rio Grande Box has created pressures on the raptor and water fowl population. Without regulation of the recreational boating season, permanent harm will result to wildlife populations.

4 The reach of the Rio Grande between Lobatos Bridge and the New Mexico State line should be administered as if it were Wild & Scenic, and BLM should support Wild & Scenic designation by congress.

Sincerely,

ERA Taos, Realtors

By: Louise Rose
Louise Rose
Qualifying Broker

LR/ct

313 PASEO DEL PUEBLO NORTE • TAOS, NEW MEXICO 87571 • (505) 758-0112

135

December 13, 1989

Mr. David Taliaferro
RMP Team Leader
Bureau of Land Management
Canon City District Office
P.O. Box 1171
Canon City, CO 81212

Re: Comments on the Draft San Luis Resource Management Plan and Environmental Impact Statement

Dear Mr. Taliaferro:

We are writing to express our concern with the portion of the above-referenced plan which proposes to designate the Rio Grande near the Colorado-New Mexico stateline as a wild and scenic river under the National Wild and Scenic River System. We strongly encourage you not to designate the Rio Grande for the following reasons:

135-1 1. The Rio Grande in that reach could hardly be described as "free-flowing." While there are no dams in this area, the source of the water for much of the year comes from irrigation return flows from lands in the San Luis Valley because the waters of the Rio Grande within the San Luis Valley are, in many years, totally utilized all summer by irrigation diversions and municipal users with no water available to the lower reach of the river. Any effort to "restore" this stretch of the river would have significant adverse consequences on the San Luis Valley. You have failed to consider this situation in your analysis.

135-2 2. The water which is delivered through this reach of the river occurs as the result of administration for the Rio Grande Compact and not because the river is in a "natural" condition. It is essential that the State of Colorado and the water users in the San Luis Valley have freedom to administer the existing water rights under the Rio Grande Compact. Any effort to "restore" the Rio Grande will inevitably place limitations on Colorado's

135

ability to utilize its compact-apportioned share of the river's flow.

135-3 3. The Rio Grande and Conejos Rivers and tributaries thereto are grossly over-appropriated and there are substantially greater legal rights to the use of water in most years than there is water in the stream.

135-4 4. The establishment of a wild and scenic river in this reach would create a reserved water right which the federal management agency would then have the ability to utilize to frustrate changes in water rights and improved water use efficiency within the San Luis Valley. This in turn would cause enormous expense to our citizens.

135-5 5. The Rio Grande below the Colorado stateline is already designated as a wild river and this short segment in Colorado is unnecessary to protect the river within New Mexico.

135-6 6. There is a suggestion in the referenced plan that the administrative control over the river would be placed in the hands of the Taos Resource Management area, a situation which we find to be unacceptable.

135-7 7. Over half of the land along the river corridor proposed for designation is in private ownership and we specifically resist the concept that the federal government would come in and force land use controls and restrictions on private land owners.

135-8 8. The Wild and Scenic Rivers Act allows your agency to condemn private land if the river is designated. We strongly resist a designation which would then permit the condemnation of private property.

135-9 9. This river should not be managed solely for the benefit of a few floaters. It does not have the requisite outstanding remarkable values to justify its inclusion.

135-10 10. The management of this river can be accomplished just as well through a special resource management area which would protect the existing values but would not impose the onerous burdens and restrictions on the citizens of the San Luis Valley that a national wild and scenic river would impose.

135-11 11. The draft resource management plan establishes that the proposed designation of the Rio Grande would have no economic benefit to our region and we see no reason to impose these new restrictions without any benefits.

135

135-12 12. We believe that the Rio Grande River Study Report, Appendix E to the referenced document, is wholly inadequate. It ignores existing water use and water quality data. It draws conclusions which are unwarranted by the facts and it fails to consider the bulk of the impacts to both the natural and human environments within the San Luis Valley.

135-13 We respectfully request that the Bureau of Land Management withdraw its recommendation to designate the Rio Grande above the Colorado-New Mexico stateline as a wild and scenic river and instead manage the area pursuant to special management status.

Very truly yours,

James T. DeFolger
Mayor of La Jara, Co.

136

December 24, 1989

Dave Taliaferro, RMP Team Leader
Bureau of Land Management
Canon City District Office
P.O. Box 2200
Canon City, CO 81215-2200

Dear Mr. Taliaferro.

After studying the draft copy of the San Luis Resource Management Plan, I would make the following comments:

Referring to the Summarized Comparison of Alternatives, Table S-1: I believe, with the one exception noted below, the Preferred Alternatives are reasonable solutions to the existing conditions. However, in the
136-1 Recreational Management section, the 99% use open to OHV's seems excessive, especially in light of the increasing OHV use in the Valley. The Natural Resources Management Alternative seems much more reasonable.

Sincerely yours,

Robert M. Armagast

Robert M. Armagast
94 Monterey Ave.
Alamosa, CO 81101

137

Box 6387
Santa Fe, NM 87502

December 26, 1989

Dave Taliaferro
RMP Team Leader
Bureau of Land Management
Canon City District
P.O. Box 1171
Canon City, CO 81212

Dear Mr. Taliaferro,

I am a resident of Santa Fe, New Mexico, a member of Amigos Bravos, and a writer interested in the Rio Grande. My current research and writing project is titled RIO GRANDE/RIO BRAVO: A Tale of Two Rivers. This project has taken me to every reach of the Rio Grande in the last two years. Because of this experience, I wish to make the following comments on the Draft Resource and Management Plan and Environmental Impact Statement for the San Luis Planning Area.

The entire Rio Grande corridor, from the source to the mouth, is the heart of one of the most important and diverse regions in the southwest. The variety of ecosystems present along the Rio Grande is astounding, and each one has the need for understanding and special protection.

137-1 The forty-one miles of river which you focus on in the draft plan is unique because of its aquatic and riparian environment, which supports an important raptor and water fowl population. This population is under growing pressure. Recreation and other uses of the river are increasingly important and the management plan, I believe, should aim for two objectives: integration of as many river miles as possible into one planning area, and prioritizing uses so as to permit raptor populations to have the most privileged position.

137-2 I believe that the entire forty-one mile reach of the Rio Grande under study here should be included in a National Conservation Area. The NCA would include Wild and Scenic Rivers, Areas of Critical Environmental Concern, and Scenic River and Recreational Areas. Under joint management, the primary goal of such a designation would be to preserve and enhance the habitat on which raptors depend. The need to create an NCA follows from an understanding that raptors are a key species in this system; their disappearance would signal the beginning of disintegration of the eco-system. Studies already show that stress is beginning to affect breeding numbers and patterns. It is my hope that an integrated approach to planning and management of this area would assure its stability as an important member of the Rio Grande's family of eco-systems.

Thank you very much for this opportunity to comment on the Draft Plan and EIS.

Sincerely,

Pat D'Andrea

Patricia A. D'Andrea

138

P.O. Box 15
Taos, NM 87571
26 December 1989

Mr. Dave Taliaferro
RMP Team Leader
Bureau of Land Management
Canon City District
P.O. Box 1171
Canon City, CO 81212

Dear Mr. Taliaferro:

Thank you for the time you have put into studying the management options for the Rio Grande. We appreciate the opportunity to comment, and hope that you will seriously consider the following recommendations.

The 41 miles of river in Colorado under this study, plus the stretch in New Mexico from the state line to Velarde, form the heart of an ecosystem that is in dire need of greater protection. The aquatic environment and riparian zone of the Rio Grande supports an important raptor and water fowl population that is under growing pressure.

The Rio Grande from the state line to the Rio Pueblo in Taos County is Wild and Scenic. The section from Lobatos Bridge to the state line in Colorado should be given the same status by Congress, and consistent management should be applied to the whole stretch of river.

We support your recommendations calling for Wild and Scenic status and also to terminate powersite and water storage withdrawals. BLM should continue to pursue land exchanges to consolidate ownership, and should seek to acquire scenic and protective easements. We recommend the Natural Resource Enhancement Alternative in its entirety, and suggest some additional protections as well.

-1 Section B has the necessary attributes of a scenic river under the Wild and Scenic River Act - wildlife and recreation opportunities are present. It should be included in a Wild and Scenic Bill and Section A should be further investigated for inclusion.

-2 Recreational activities can be enhanced, by the construction of camping sites at access points, while at the same time monitoring and permitting can create protection for wildlife by limiting recreational use to certain parts of the year.

-3 The Taos Resource Area has found in ornithological studies that recreational boating use in the spring impacts raptors and water fowl populations in the gorge below Labatos bridge. A strict closure to boating, enforced on-site, from March through June is necessary to protect these birds. Following that time, a permitting system coordinated with the Taos Area BLM, should be instituted.

-4 Riparian values should be improved by more intensive management of grazing, including exclusion of cattle from the riparian zone and creation of alternative water sources.

138

Mr. Dave Taliaferro

138-5 The entire 41 mile portion of the Rio Grande under study should be included in a National Conservation Area (NCA) currently under discussion by the Taos Resource Area. The NCA would contain Wild and Scenic River (WSR), Areas of Critical Environmental Concern (ACEC) and Scenic River and Recreational Areas. Under joint management by agencies in Colorado and New Mexico, the NCA would have as its primary goal the preservation and enhancement of habitat and populations of raptor and water fowl which use the Wild Sections of the Rio Grande and surrounding lands. The need to create such protection follows from the understanding that unless the whole ecosystem is safeguarded, the key species will diminish or perish. Of course, the viability of many other less prominent species will be aided in the process.

Properly structured, an NCA could support the additional administrative costs (administration, enforcement, education, fencing of riparian areas, easement acquisition, etc.) by achieving a greater prominence for the managing agencies and allowing for greater budgetary allocations.

The recreational activities connected with sightseeing, controlled boating use, and wildlife viewing could bring some additional commerce to the surrounding communities.

Sincerely yours,

Hank Saxe

Hank Saxe

Cynthia Patterson

Cynthia Patterson

xc: Ben Nighthorse Campbell
Tim Wirth
Bill Armstrong

139

...nef Seattle was one of the last
...pokesmen of the paleolithic mora...
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... blood that unites us all. Man did
... weave the web of life, he is merely
...rand in it. Whatever he does to
...web, he does to himself. . .*

Reprinted from: The Power of Myth
by Joseph Campbell.

Robert W. Stewart
Box 5505 Nickell Road
Ranchos de Taos, NM
87557

phone 758-1237

12-26-89

Dave Taliaferro,

I wish to echo the comments made to you by letter from Amigos Bravos president Mary Humphrey. I strongly urge that you seriously consider a more intensive RMP than the preferred alternative for the San Luis Resourse Area DRMP. Of particular concern to me and many others is the easy road and poaching access to the east rim. For more background data I refer you to Todd Wilkinson's fine feature article in the Dec. 18, 1989 issue of High Country News. Subject: POACHERS. If you don't have a copy and want to see one let me know and I will send you one.

139-1

Sincerely,

Bob Stewart

140

4700 Venturi Lane
Fort Collins CO 80525
December 23, 1989

Mr. Dave Taliaferro
RMP Team Leader
Bureau of Land Management
Canon City District Office
P.O. Box 1171
Canon City CO 81212

Dear Mr. Taliaferro,

Please accept these comments on the Draft San Luis RMP/EIS.

140-1 There is an inconsistency between Table H-4, in which Elephant Rocks is shown as to be designated an ACEC under the Preferred Alternative, and the text on page 3-32, in which Elephant Rocks is not included. Elephant Rocks should be designated an ACEC, with management emphasis on continued existence of habitat for *Neoparrya lithophila*. I have seen first-hand the potential conflicts with other uses of this area, and I encourage and support a creative management plan to bring the multiple demands on the area together in a way that the plant's habitat can be perpetuated.

140-2 RaJadero Canyon should be designated an ACEC with management focus on improvement of habitat for *Astragalus ripleyi*. There is no proposed ACEC that is equivalent in quality or quantity to the RaJadero area. I am confident that when you consider carefully the results of the 1989 CNAP field study of this federal candidate species, and consult with the USFWS regarding the need to provide a special management area for this species, you will agree that the RaJadero Canyon site should be designated.

Thank you.

Sincerely yours,

Susan S. Martin

Susan S. Martin, Ph.D.

141

December 25, 1989

Dave Taliaferro
Bureau of Land Management
Canon City District
P.O. box 1171
Canon City, CO 81212

Dear Mr. Taliaferro:

I am a concerned member of the human species, whose responsibility for the devestation, decimation, and extinction of countless species who co-created with us this ecosystem we share can no longer be denied or evaded. Remedies where any are still possible will need to be found and embraced in the local areas, stream by stream, watershed by watershed.

In our own watershed, the Rio Grande, it is true that poaching has seriously stressed many species populations. This is a reality; BLM's and other agencies' efforts to curtail this practice are commendable. It is a slow and difficult process to change traditional customs (where these are involved).

141-1 However, it must be stressed that to throw open to recreation and/or any development regions of the Rio Grande adjacent to the Wild & Scenic River, where raptors and water fowl are already struggling, would be criminal and would lead to further and perhaps irreversible damage to yet more species. If wildlife protection is truly a value we hold in common and not just a phrase used by government agencies and private corporations alike to evoke the public's benign or sentimental endorsement of said agencies' or corporations' policies, then we've got to get our agendas to function congruently across human-designated borders which other species cross as if they weren't there at all. For them, they aren't. Why should these creatures be forfeit because we divide land on paper and behave as though we could devestate one square here and there and too bad if the wildlife inhabitants don't have the common sense to pack up and find a new spot to procreate!

141-2 I support the Natural Resource Enhancement Management Plan as the best river management plan for the San Luis Resource Area in Southern Colorado. The stretch of the river between Lobatos Bridge and the New Mexico state line ought to be administered as though it were Wild and Scenic River as well, and furthermore, the Bureau of Land Management ought to try to get it designated as such by Congress.

Sincerely yours,

Susann McCarthy
P.O. Box 1591
Taos, New Mexico 87571

142

December 24, 1989

Dave Taliaferro
Bureau of Land Management
Canon City District
POB 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro,

142-1 I live in Arroyo Hondo, New Mexico, 2 miles east of the Rio Grande Gorge. I'm writing to express my hope that the B.L.M. will administer the area of the Rio Grande between Lobatos Bridge and the New Mexico-Colorado state line as if it were a wild and scenic river, and support wild and scenic designation by the U.S. crongres.

Without this designation and seasonal regulation of recreational boating, wildlife, raptor, and waterfowl populations will suffer. This has been shown by the research of Ben Keykendall and Ron Gardiner.

I urge you to consider the value of our Southwestern habitat and wildlife in light of the ecological disasters and management errors that have so seriously diminished the livability of the United States and the earth as a whole.

Sincerely

Avril Fogden

Avril Fogden
P.O. Box 434
Arroyo Hondo, NM 87513

143

12/89

Dave Taliaferro
Bureau of Land Management
Canon City District
POB 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro,

143-1 I am writing to make known my support of the Natural Resource Enhancement Management Plan as the appropriate river management plan for the San Luis Resource Area in Southern Colorado. My concern is that wildlife protection, with goals to acquire scenic or protective easements on the east side of the river, be included in the RMP.

143-2 As noted in the RMP, excessive or untimely recreational use on the Upper Rio Grande Box has created pressures on the raptor and water fowl population. Without regulation of the recreational boating season, permanent harm will result to wildlife populations.

143-3 The reach of the Rio Grande between Lobatos Bridge and the New Mexico state line should be administered as if it were Wild & Scenic, and BLM should support Wild & Scenic designation by congress.

Sincerely,

116 Eighth
Santa Fe N.M
87501

144

[illegible]
Sunnyside 18, 1989
Bureau of Land Management
POBox 1171
Canon City, Colorado 81212.

Dear Sirs,

Please accept my comments on the San Luis Draft Resource Management Plan Environmental Impact Statement. Bureau of Land Management Colorado.

The San Luis Resource area contains outstanding natural attributes including: wilderness, multi-biological, cultural and scenic resources of certain national significance. With such unique, varied and fragile resources providing an essential refuge for plants and for all life.

I think, it should be obvious that the government cannot allow a native small guarantee of deciduate BLM on this Resource area distinguishing it as a genuine national treasure.

May I suggest a progressive management area on the Rio Grande, a national treasure, along with the biological resources, be fully protected, as to actually serve man, and all life.

144-1 I request the following areas, with acres, be designated Wilderness:
South Pinnacle 1,100
Black Canyon 2,530
Dead Cattle 1,800
Sangre 1,210
Sangre Cave 805
San Luis Hills 13,100

With the total designated Wilderness located on the San Luis Resource area, Bureau of Land Management areas, to include at least 210,000 acres, a National Wilderness Preservation System.

144-2 Do not complete gentrification of current / proposed areas / special concern, including Elephant Butte.
and similar areas considered as areas / special concern / areas / critical environmental / interest.

144-3 Decrease Storage level to save water, plant and animal resources

144-4 Do not pave the Sand Dune Road in Trail Gulch Wilderness and service roads.

144-5 Afford all of the Rio Grande Rivers National Wild Rivers status.
Allow to accept which river supports an outstanding biological community / with national significance.

144-6 Protect community / with national significance
Protection of the San Luis Resource area as a designated National Natural Preserve.
With this area classified as a National Critical Habitat area, as well.
And to guarantee that the Dunes Forest Habitat receive inclusion as a National / Dunes Sanctuary System.

For when we take our natural lands and waters, we serve America!

Sincerely,
John R. Dunnom

PIKES PEAK GROUP OF SIERRA CLUB
c/o John Stansfield, Conservation Chair
Box 588
Monument, CO 80132

December 21, 1989

Dave Taliaferro, RMP Team Leader
Bureau of Land Management
Box 1171
Canon City, CO 81212

Dear Dave,

Merry Christmas and Happy New Year to you! Here is your present from the Pikes Peak Group of Sierra Club. We ask that you include it in the official hearing record for the Draft San Luis Resource Management Plan and EIS now open.

Our comments and recommendations are as follows:

GENERAL COMMENTS--You and your staff have done an excellent job in preparing the draft SLRMP, from identifying issues and concerns to producing the document now before us, all the while aggressively seeking public input and involvement, even when none was forthcoming. Keep up the good work on the Royal Gorge RMP. You are laying the groundwork for environmentally sound land management.

1 One wish that we have for future plans is that plan maps, especially the base map, show more physiographic features, in addition to the political already represented. This would facilitate our analysis of management, resources and increase public education of the lands.

In general our Group supports the Preferred Alternative in the draft SLRMP. Our exceptions to this rule and comments are stated below.

2 MINERALS MANAGEMENT--We recommend the Natural Resource Enhancement Alternative (NREA) for its stipulations which safeguard other resources, as the document states. Mineral development, in the short or long term, becomes a dominant land use situation, having great effects on other resources and the land base. This necessitates greater protection and mitigation for those resources than the Preferred Alternative (PA) provides.

3 PALEONTOLOGICAL RESOURCES--We support the concept of a Clayton Cone collection area. Further we recommend an education and use plan be developed for the area with appropriate controls on use stipulated. This document would assist in monitoring future impacts on the area and decision-making as to its on-going public value.

4 RIPARIAN RESOURCES MANAGEMENT--We strongly support the proposals for riparian protection and enhancement of damaged areas. We recognize the importance of riparian zones and wetlands to water quality, quantity and flood control.

145-5 GRAZING MANAGEMENT--We support the PA. A major benefit to the entire RA would be the implementation of wholistic Resource Management practices on all grazing allotments where feasible, especially common allotments. BLM should develop an education plan to speed and facilitate the transition from former practices to wholistic.
We recognize the growing economic value of both non-consumptive and consumptive uses of wildlife in the San Luis Valley.

145-6 WILDLIFE AND FISH MANAGEMENT--We support the PA with the additions listed below. We recognize the overall importance of the Blanca WMA (including the Empurius Tract) and its 7,750 acres and the crucial role of the BLM land in the San Luis Valley as winter range.
145-7 We recommend rapid resolution of Blanca WMA water rights questions and Empurius tract development.
145-8 We recommend a Blanca ACEC be established.
We recommend NSO and CHV stipulations as stated in the NREA. We propose comprehensive OHV regulations be enforced (See Recreation Management below).
145-9 We recommend establishment of management procedures for emergency wildlife/winter range situations allowing temporary allocation of domestic animal forage to wildlife beyond the 60/40 formula of the PA. In this way this formula would not be an obstacle in times of imminent wildlife mortality, as we have seen in the recent past.

145-10 FOREST AND WOODLAND MANAGEMENT--We recommend strongly the NREA, while finding that the procedure set forth in the PA for cooperative planning with the USFS on adjacent lands seems a step forward.
No matter what the management scheme, it is the position of the Sierra Club that the Resource Area should undertake no below-cost timber sales on commercial forest lands. At the same time we urge the Resource Area to realistically determine benefits, especially wildlife and watershed values, in computing commercial timber sale cost/benefit ratios. Quite often these values can be overstated to justify a below-cost sale. Land management dollars are too valuable to be lost on such sales and as welfare to private timber operators.

145-11 LANDS AND REALTY MANAGEMENT--We recommend the PA with the addition of the major facility siting stipulations from the NREA. These stipulations seem most sensible in avoiding future resource management conflicts in areas already identified as containing valuable natural resources for which management prescriptions are being made in the RMP.
145-12 We recommend new withdrawals for the Rio Grande ACEC/SRMA (6,016 acres) and Blanca ACEC/WMA (7,750 acres).
145-13 We recommend movement of the proposed alignment for the Taos 345kv power-line out of conflict with the Utility Corridor Exception Areas of the PA.
145-14 We recommend exchange or acquisition of the state land sections within the San Luis ACEC area, for the purpose of assuring effective future management without conflict, as directed by the RMP.

145-15 AREAS OF SPECIAL CONCERN--We recommend the ACEC's as proposed in the NREA. Geological, historical and cultural values in the Bishop's Rock and Elephant Rocks areas (in addition to special botanic values in the latter) would be best protected through ACEC designation and management.
145-16 The Draft RMP is deficient in its lack of consideration for the potential

between the Rio Grande Corridor and the San Luis Hills, including both Platte and San Luis Hills. Visual, recreational, wildlife, botanic, and other resources are shared in this single physiographic region. Coordinated management is required here as well. The Draft RMP only treats these areas as separate and unrelated. Potential BLM land acquisitions between San Luis Hills and the river corridor only heighten the need for a wholistic viewpoint to management of the region.

We strongly disagree with both the NREA and PA in their determination of suitability of only 6.8 miles of the Rio Grande for Wild and Scenic River recommendation to Congress. While we agree that the proposed 6.8 mile river segment (6.8 Wild, 2.0 Recreational) has significant wild river values worthy of protection, we also think that there are significant Recreational river values in the 12.3 miles upstream equally worthy of protection.
We recommend 21.1 miles of the Rio Grande for Wild and Scenic Rivers Act designation, 6.8 miles Wild and 14.3 miles Recreational River status.
We feel our rationale for this recommendation is compelling.
The upstream segment (Segment B in the River Study) shares numerous significant values, including raptor habitat and fisheries, with the 8.8 mile Segment C. But this upper 12.3 miles we propose contains additional different and often complimentary values. The visual experience is a striking and expansive one, quite different from downstream. Upstream, a greater diversity of geographic features are evident. Wildlife and fisheries values are significant. For the boater and fisherman it is a different, though quality experience, as well. It is an ideal segment for beginning rafters and canoeists, bank and float fishermen, hunters, photographers and bird and animal watchers. Though in need of
17 restoration through proper management, the riparian environment of the upstream segment is significant, considerably greater than that in Segment C. We feel that all of these characteristics of Segment B are outstandingly remarkable in nature.
The degree of naturalness is high here as well. By comparison, we suggest it is as high or higher than rivers in other parts of the United States already designated as Recreational, or even Scenic, Rivers. An analysis of the existing Wild and Scenic Rivers system will bear this out.
Why then should this segment not be recommended, if it so compares? According to BLM staff there are no significant resource conflicts which would mitigate against recommendation of Segment B, as we propose.
While excluding the 12.3 miles from Recreational River recommendation in its River Study Report, the BLM Study Team grants that the segment has "relatively undisturbed natural foreground scenic vistas". We might add it contains remarkable mid and background vistas as well, which Segment C does not have to any degree. The Study Team rejects the upstream segment, however, for not being a deep continuous, rocky canyon. SegmentB is being exclude not for what it is-outstandingly remarkable in resources and substantially natural in appearance--but for what it is not--a continuous canyon. Nowhere in the Wild and Scenic Rivers Act that being in a canyon (attractive or otherwise) is a criteria for recommendation of a river.
In fact, the diversities and differences between study Segments B and C are complementary and both are deserving of Wild and Scenic Rivers Act protection.

WILDERNESS--While we enthusiastically support the proposal for a San Luis Hills ACEC of 16,500 acres, our Group is also continuing to recommend to Congress an approximately 10,200 acre San Luis Hills Wilderness Area. The district wild values of this area deserve statutory protection

145-18 RECREATION MANAGEMENT--We recommend the NREA, with one very large exception, which is Off Highway Vehicle management.
It is our well-founded belief on all public lands OHV should be allowed to operate on designated routes and/or defined and enforced areas only. This approach to travel management and public education has been successfully used by the USFS in Region 2 for many years. It has significantly reduced the amount of resource damage caused by OHV and been a key in building public awareness about proper land use--two excellent objectives met by one system of management. Also, it is much more uniform and understandable than that proposed in the SLRMP. The SLRMP's hodgepodge of regulation or lack of it leaves the vast majority of public lands "open"--open to vehicular abuse, whether intentional or not.
Of course, the management scheme we suggest allows for appropriate vehicular use by land managers, allotment holders and permittees, etc., except in areas totally closed to vehicular access, as in WSA's.
145-19 While we can in some ways appreciate the philosophy of "least restrictive management" of OHV's evident in the SLRMP, there exist too many examples already of "most destructive consequences" of undirected OHV use on public lands. The proposed direction of SLRMP will only ask for more.

145-20 We recommend an OHV "play area" be designated in the Sand Castle Area. Such a designation will only encourage trespass beyond designated limits in such open country. OHV activity within and without such a designated area will further damage the fragile dune geology and ecology, potential and ongoing archeological activity and the quality of the Great Sand Dunes Wilderness Area.
If such a motorized recreation area is deemed necessary, it should be located as far from the Sand Castle Area and the Great Sand Dunes National Monument as possible, perhaps on state land administered by Colorado State Parks. Parks is an agency that can more closely monito such land abuse and charge fees to offset costs associated with such a destructive undertaking.

145-21 VISUAL RESOURCE MANAGEMENT--We support the objectives of the NREA, with one additional concern. Our recommendation of wholistic management for the Rio Grande Corridor and adjacent proposed ACEC's motivates this addition to the SLRMP: that the this region of the RA is currently VRM Class II and should be identified as such in the RMP with appropriate management to follow.

HISTORICAL, ARCHEOLOGICAL RESOURCES--We recommend the NREA.

SPECIAL STATUS PLANT AND ANIMAL SPECIES--We recommend the NREA.

145-22 WATERPOWER/STORAGE--We recommend the NREA, with the addition of 12.3 miles of Study Segment B of the Rio Grande River Wild and Scenic River proposal to the consideration of the powersite withdrawal question.

Best wishes,

John Stansfield, Conservation Chairman
Pikes Peak Group, Rocky Mountain Chapter of Sierra Club

146

P.O. Box 47
Taos Ski Valley, NM 87525
December 22, 1989

David Taliaferrro
BLM Canon City District
P.O. Box 1711
Canon City, Colorado 81212

Dear Sir:

I have reviewed your Draft Management Plan for the San Luis Resource Area, especially Appendix E, and have the following comments:

Based on my current effort to learn more about the wild trout fisheries in New Mexico on BLM land just downstream of your area, I believe that you plan will have direct impact on management of the Wild and Scenic River area here.

By copy of this letter, I alert the Taos Resource Area management to the interactive relationship of your plan and its Final Environmental Impact Study for the Molycorp Tailings Disposal Facility as regards fisheries.

146-1 I suggest some appropriate special management treatments for wildlife and fisheries for the Rio Grande above and below Lobatos Bridge all the way to the Alamosa National Wildlife Refuge. The stretch from the New Mexico border to near Lobatos Bridge clearly should be in the National Wild and Scenic River System.

146-2 We must consider the "dewatering" of the Rio Grande per operation of the Rio Grande Compact since 1986 a most serious national concern.

Sincerely,

William L. Stevens

Copy to: Taos Resource Area

147

12/89

Dave Taliaferro
Bureau of Land Management
Canon City District
POB 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro,

I am writing to make known my support of the Natural Resource Enhancement Management Plan as the appropriate river management plan for the San Luis Resource Area in Southern Colorado. My

147-1 concern is that wildlife protection, with goals to acquire scenic or protective easements on the east side of the river, be included in the RMP.

147-2 As noted in the RMP, excessive or untimely recreational use on the Upper Rio Grande Box has created pressures on the raptor and water fowl population. Without regulation of the recreational boating season, permanent harm will result to wildlife populations.

147-3 The reach of the Rio Grande between Lobatos Bridge and the New Mexico state line should be administered as if it were Wild & Scenic, and BLM should support Wild & Scenic designation by congress.

Sincerely,

Caroline Gray Wolf
Box 693
El Prado NM
87529

148

12/89

Dave Taliaferro
Bureau of Land Management
Canon City District
POB 1171
Canon City, Colorado 81212

Dear Mr. Taliaferro,

I am writing to make known my support of the Natural Resource Enhancement Management Plan as the appropriate river management plan for the San Luis Resource Area in Southern Colorado. My

148-1 concern is that wildlife protection, with goals to acquire scenic or protective easements on the east side of the river, be included in the RMP.

148-2 As noted in the RMP, excessive or untimely recreational use on the Upper Rio Grande Box has created pressures on the raptor and water fowl population. Without regulation of the recreational boating season, permanent harm will result to wildlife populations.

148-3 The reach of the Rio Grande between Lobatos Bridge and the New Mexico state line should be administered as if it were Wild & Scenic, and BLM should support Wild & Scenic designation by congress.

Sincerely,

Philip Cole

149

4700 Venturi Lane
Fort Collins CO 80525
December 22, 1989

Mr. Dave Taliaferro
SLRMP Team Leader
BLM, Canon City District Office
P.O. Box 1171
Canon City CO 81212

Dear Mr. Taliaferro:

I wish to enter the following comments regarding the Draft San Luis Resource Management Plan and Environmental Impact Statement.

149-1 I am disappointed that the Draft RMP omits Rajadero Canyon from the list of ACECs to be designated under the Preferred Alternative. There can be no dispute that *Astragalus ripleyi*, a plant that will be listed (early 1990) as a Category 2 (Candidate) species under the Endangered Species Act, meets the "relevancy and importance" criteria for ACEC designation. All evidence of which I am aware points to Rajadero Canyon and other nearby drainages as containing the largest, best-quality population of *A. ripleyi* known. There is no other ACEC proposed in the RMP that can provide adequately for the preservation of this species. Thus, I urge that you designate a Rajadero Canyon ACEC with boundaries to be determined based on recommendations by Colorado Natural Areas Program and U.S. Fish and Wildlife Service botanists.

149-2 In addition, I ask that Elephant Rocks be included for ACEC designation in the Preferred Alternative. There is confusion between omission of this site in the text, and its inclusion under the Preferred Alternative in Table H-4. I assume Table H-4 is correct, and that the text will be corrected to include this site under the Preferred Alternative. I strongly support ACEC status for Elephant Rocks, because without active management for preservation of its habitat, I believe the present population of *Neoparrya lithophila* will inevitably decrease due to conflicting resource use.

Thank you for the opportunity to review and comment on the Draft RMP. Please keep me on your mailing list for the final plan.

Sincerely,

M. P. Steinkamp

M. P. Steinkamp, Ph.D.

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COLORADO NATIVE PLANT SOCIETY

P.O. BOX 200 • FORT COLLINS, COLORADO 80522

December 22, 1989

Mr. Dave Taliaferro
RMP Team Leader
Bureau of Land Management
Canon City District Office
P.O. Box 1171
Canon City CO 81212

Dear Mr. Taliaferro,

Thank you for the opportunity to comment on the Draft San Luis RMP/EIS. As you know from our previous participation and communication regarding the preparation of this RMP, the Colorado Native Plant Society is especially concerned that management be provided to perpetuate the uncommon plant species and plant communities found in this Resource Area. Our reading of the Draft RMP does not convince us that this has been accomplished.

1 First, we believe the Draft RMP is seriously deficient in that it does not acknowledge and incorporate BLM national policy with regard to federal ESA Candicate plant and animal species---*i.e.*, that candidate species are to be treated for planning and management activities as if they were listed, and that Resource Areas are directed to identify and designate qualified ACECs. In the "Existing Management" alternative, *Areas of Special Concern* section (p. 3-13), no ACECs are proposed, despite the acknowledgement that a number of sites meeting the ACEC relevancy and importance criteria exist.

2 Similarly, the *Special Status Plant and Animal Species* section (p. 3-13) does not even mention candidate or state special concern list species. Based on our understanding of BLM national policy, we believe that these two sections must be revised in the Existing Management and Resource Production alternatives. This will then necessitate further revisions in summaries and Tables.

3 The discussion of *Areas of Special Concern* under "Management Guidance Common to All Alternatives" (p-3.7) in the Draft RMP discusses only the Rio Grande river corridor. We fail to understand why this section does not include discussion of all the areas, throughout the Resource Area, that contain sensitive resources and that are proposed for special management. The section as it stands gives the mistaken impression that no sensitive resources exist other than in the river corridor.

4 With regard to *Special Status Plant Species* (p. 2-59 and Table 2-35), *Astragalus ripleyi* is incorrectly stated to be "Listed, Threatened." It is expected that *A. ripleyi* will be included as a Candidate for listing, in a notice to be published in the Federal Register in early 1990; thus, it is appropriate to refer in this RMP to *A. ripleyi* as a Candidate. Table 2-35 should be revised to correct several errors. The federal status for *A. ripleyi* should be Category 2. Its habitat, in the Draft so generally

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Mr. Taliaferro
- page 2 -

150-5 indicated as to be misleading, is on volcanic substrates, in grasslands among open pinyon-juniper or ponderosa pine stands. Footnote 1 is incorrect: the CNAP ranking proceoure is not used by heritage programs elsewhere. The CNAP list categories have been abridged poorly, so that their meaning is not always clear. We recomend inclusion of the exact CNAP list titles here. Footnote 2 incorrectly refers to "Table 2.23-1" rather than to Table 2-35.

150-6 Table 2-36 also contains a number of errors. The subheading "sensitive floristic communities" does not seem appropriate for all of the areas grouped within that title. The "sensitive plant association" listings use a ranking scheme no longer used by CNAP. Both footnotes are incorrect for reasons stated above. We recommend this table be omitted entirely, as it seems to add more confusion than enlightenment, or at least revised with information and terminology from CNAP. If you wish to retain Table 2-36, we could provide more detailed suggestions.

150-7 The Elephant Rocks site, which would be designated as an ACEC under the Natural Resource Alternative, is omitted without explanation in the Preferred Alternative list (p. 3-32). We note, however, that Elephant Rocks is listed as a designated ACEC in Table H-4. Presumably the omission in the text is an oversight that will be resolved in the final RMP. We strongly support designation of Elephant Rocks, which meets ACEC relevance and importance criteria. As noted on page 2-42, we agree that special

150-8 management is required to assure that *Neoparrya lithophila* habitat is not degraded. Although at present the vegetation associated with the rocks is in relatively good condition, the grassy areas among the rock outcrops are in comparatively poor condition. It is essential that Elephant Rocks be

150-9 designated an ACEC in the Preferred Alternative. In connection with this point, we wish to comment that logic provides that if a site meets the ACEC importance and relevancy criteria under any alternative, it must meet them under all alternatives; according to BLM policy, such a site should be designated under all alternatives.

150-10 It is incumbent upon the Resource Area to provide management plans that will improve the security of candidate and state sensitive plant species. Our greatest concern with the Draft RMP is that this has not been done for *Astragalus ripleyi*. Having previously nominated RaJadero Canyon as an ACEC for the protection of *A. ripleyi*, we cannot understand or accept the Draft RMP's omission of designation for this site. As noted above, *A. ripleyi* will be an official Candicate species by the time this RMP is finalized. Thus, there can be no question as to the "importance" and "relevance" criteria being met. This candidate plant species requires special management to prevent its subsequent listing as threatened or endangered. Before preparing this comment, we asked to examine the data obtained by CNAP in its *A. ripleyi* studies during the summer of 1989. Our assessment of this information, together with our conversations with CNAP and USFWS botanists and our own field explorations of the area, convince us that the RaJadero Canyon area is by far the best site for conservation of this species. The range of *A. ripleyi* appears to have contracted over the past decades, suggesting that active management will be necessary to prevent its listing

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Mr. Taliaferro
- page 3 -

as threatened or endangered. The species is found only in a narrow range of plant communities, and only on a few specific volcanic substrates.

Table H-3 states that special management for *A. ripleyi* will be addressed on other BLM ACECs. This is not satisfactory. We assume this statement refers to the proposed Los Mogotes ACEC, which contains a small *A. ripleyi* population. However, the management emphasis for Los Mogotes clearly is on enhancement of winter range for game species (page 2-44), a value that directly conflicts with preservation of *A. ripleyi*. Although it is essential that the plant be considered in management provisions for Los Mogotes, it is equally important that another site be designated that has as its primary management goal the mitigation of threats to *A. ripleyi*, and the enhancement of its habitat. The Draft RMP should be modified to include the RaJadero Canyon site in the list of nominated ACECs analyzed under each RMP alternative.

11 Incidentally, we see no justification for the separation (Tables H-2 and H-3 and related text throughout the document) of areas originally proposed for ACEC consideration and sites subsequently proposed. A preliminary draft should be just that---a working document designed to elicit further ideas and information. Why segregate that information and treat those proposals differently, once you get them?

Other than the omission of RaJadero Canyon, we support all the areas proposed for special management designation (Table H-4), including the combination of Flat Top with San Luis Hills. We also support the general concept of riparian resource management (p. 4-2), in the anticipation that such management would improve habitat for native riparian and aquatic plants.

12 In the Preferred Alternative section on *Lands and Realty Management* (p. 4-3), specific statements should be added to the effect that there will be no disposal of any lands providing habitat for federally listed, candidate, or state sensitive plant and animal species.

Thank you for considering our comments, which we hope will contribute to an improved Final RMP. Please contact us if we can supply further information or elaborate on any point raised above.

Sincerely yours,

Susan S. Martin

Susan S. Martin
Conservation Committee Chair

151

Michael Levison
P O Box 268
Taos, New Mexico
87571
505.758.4193

26 DEC 89

MR TALIAFERRO,

I AM WRITING TO YOU CONCERNING THE DRAFT RESOURCE MANAGEMENT PLAN FOR THE SAN LUIS PLANNING AREA.

151-1 I WANT KNOWN MY STRONG SUPPORT FOR 1.) THE DESIGNATION OF SECTION C (THAT AREA BETWEEN LOBATOS BRIDGE AND NM. BORDER) A WILD AND SCENIC RIVER, AND 2.) THE MANAGEMENT OF SECTIONS A+B UNDER THE NATURAL RESOURCE ENHANCEMENT ALTERNATIVE.

AS AN AVID RIVER USER (KAYAKER, RAFTER, HIKER) I CAN APPRECIATE THE NEED FOR RECREATION MANAGEMENT. HOWEVER, THE OVERALL QUALITY OF THE RIVER EXPERIENCE INCLUDES THE HUMAN-WILDLIFE INTERACTION. THIS IS WHERE MY MAIN CONCERN LIES; THAT OF PROPER WILDLIFE RESOURCE MANAGEMENT WHEN RECREATION IS BEING ENCOURAGED IN A LOCALE.

THANKS FOR YOUR CONCERN, Michael Levison

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STATE OF COLORADO

Division of Parks & Outdoor Recreation
Colorado Natural Areas Program

1313 Sherman Street, Rm. 618
Denver, Colorado 80203
Phone (303) 866-3437

MEMORANDUM

TO: Steve Morris

FROM: Dave Rupe

DATE: 11 December 1989

SUBJECT: Draft San Luis Management Plan and Environmental Impact Statement

Colorado Natural Areas Program staff has reviewed the Draft San Luis Resource Management Plan and Environmental Impact Statement with the following comments.

p. 2-42

152-1 AREAS OF SPECIAL CONCERN
Elephant Rocks and their associated vegetation are in relatively good condition, but the flat grassland areas between rock outcrops are in poor condition. Special management will be required if these areas are to recover, in keeping with ACEC designation for sensitive plant resource values. The area is apparently used currently by local youth for recreational purposes. It is suitable as a natural history interpretive area, and could be a valuable educational resource for local schools.

p. 2-55

152-2 Special Status Plant Species
Astragalus riplevi is not listed as threatened under the Endangered Species Act at this time. It is not yet an official candidate for listing (Category 2), but will be published as such in an updated Federal Register notice due out in 1990. The second sentence under Special Status Plant Species should read: "Several federal candidate and/or sensitive plant species occur in the resource area which could become listed as threatened or endangered without appropriate management." Astragalus riplevi is currently being considered for listing by the U.S. Fish and Wildlife

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Service and is the subject of a status survey by CNAP (report due out in February 1990). The national policy of the BLM with respect to candidate species is to treat them as if they were listed in all planning processes.

p. 2-60

152-3 Table 2-35. The federal status of Astragalus riplevi is not LT, as the table indicates. The federal status should be Category 2.

Habitat for Astragalus riplevi is:
fescue grasslands near or in open ponderosa pine or pinyon-juniper woodlands on volcanic substrates.

152-4 Footnotes to Table 2-35 should read:
"These ranking are provided by the Colorado Natural Areas Program (CNAP). This standardized ranking procedure was developed by CNAP to assist land managers in assessing status and management needs for plant species of special concern to the state of Colorado."

"List 1. Federal threatened or endangered plant species that are rare throughout their range, including species endemic to Colorado.
List 1*. Plant species presumed extinct.
List 2*. Plant species presumed extirpated from Colorado.
List 2. 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. Plans of limited distribution or of special interest which appear secure at this time (watch list)."

"*The symbols utilized in the Federal Status column (Table 2-35)..."

p. 2-62

152-5 Table 2-36. Table 2-36 contains confusing information, some of which is erroneous. Table 2-36 should be revised, redesigned, or eliminated.

Only two areas were recommended by CNAP for special management area status. These were Elephant Rocks and Flat Top Mesa, for the important populations of Neoparrya lithophila which are found there. CNAP supports designation of San Luis Hills WSA as an ACEC if data indicate the pinyon-juniper woodlands are in good condition. CNAP is further prepared to recommend RaJadero Canyon and adjacent areas as an ACEC to

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provide the necessary management to preserve and enhance Astragalus riplevi habitat (map indicating suggested boundaries attached). RaJadero Canyon and adjacent drainages contain the best populations known of Astragalus riplevi.

152-6 CNAP did not recommend for special status the following areas:
Grande Mogote Mesa
Little Mogote Mesa
South Pinon Hills
Pinon Hills.
These areas may be worthy of special management area designations, but the recommendation did not originate with CNAP.

152-7 The plan is unclear in its references to South Pinon Hills, Pinon Hills, and San Luis Hills. The relationship of these areas to each other should be clarified to facilitate public comment on the draft plan.

152-8 "Sensitive Plant Habitats" would be more appropriate terminology for Elephant Rocks and Flat Top Mesa than "Sensitive Floristic Communities". "High Quality Plant Communities" would be preferable to "Sensitive Plant Associations".

152-9 CNAP no longer uses the ranking procedure developed by The Nature Conservancy for use by Heritage programs (e.g., G2S2). The Colorado Natural Areas Program considers high quality remnant examples of native plant communities to be worthy of protection as representative examples of Colorado's natural environment. In some instances such plant communities may be of regional significance; in others, they are of national significance.

152-10 All footnotes from Table 2-36 should be eliminated. They are either erroneous or misleading.

152

152-11 For the contents of the lower portion of Table 2-36, we suggest the following:

Special Vegetation Resources	Status
Southern Rocky Mountain Lower Montane Grasslands examples: Arizona fescue-mountain muhly Arizona fescue-slimstem muhly winterfat/Indian ricegrass	further study
Southern Rocky Mountain Lower Montane Woodlands examples: bristlecone pine/Arizona fescue-mountain muhly	further study
Ponderosa pine woodlands examples: ponderosa pine/Arizona fescue-mountain muhly	further study
Pinon-Juniper Woodlands examples: pinon pine-Rocky Mountain juniper	further study

152-12 High quality examples of these plant communities may be found in the Trickle Mountain/Sheep Creek, East Creek, and Flat Top/San Luis Hills areas. Evaluations of these plant communities should be conducted to ascertain their condition. Historical grazing practices have significantly altered native grasslands and the native understory in woodland communities throughout the San Luis Valley and the semi-arid western United States, rendering high quality relictual vegetation areas of regional as well as national significance.

p. 3-7

152-13 The Areas of Special Concern section should be expanded to provide analysis of areas proposed for management or protection of sensitive or unique resources on the entire planning area, rather than just the wild and scenic river corridor.

p. 3-8

152-14 Special Status of Plant and Animal Species
The phrase "plant associations" should be changed to "plant communities". Who makes the "necessary" determination of inventory and monitoring needs for special status plant and animal species? The specific criteria that will trigger the "necessary" determinations should be defined.

Comments on management alternatives:

EXISTING MANAGEMENT ALTERNATIVE

p. 3-13 **Areas of Special Concern / Special Status Plant and Animal Species**

152-15 The existing management alternative provides for designation of no ACECs and no attention is paid to candidate or state list plant species. This is not in keeping with present national policy within BLM which provides for treatment of candidate species as if they were listed (v. paragraph 1, page 2-59 and topic 1, page A-4), nor with the national directive for Resource Areas to identify and designate qualified ACECs.

RESOURCE ENHANCEMENT ALTERNATIVE

p. 3-18 **Areas of Special Concern**

152-16 RaJadero Canyon and adjacent areas should be added to the list of nominated ACECs (map enclosed). The RaJadero Canyon area contains the best known populations of Astragalus riplevi, a federal candidate. Preliminary data suggest that Ripley milkvetch has experienced serious declines throughout its range in the past 30-100 years. Active management intervention may be necessary to prevent listing as threatened or endangered. A. riplevi shows high fidelity to specific geologic substrates (Hinsdale formation, Masonic Park Tuff, and landslide deposits composed of these materials) and is confined to a very limited variety of plant community types.

p. 3-22 **Special Status Plant and Animal Species**

152-17 Astragalus riplevi should receive special management wherever it occurs within the resource area, and the proposed RaJadero Canyon ACEC should be managed with protection and enhancement of A. riplevi populations as the top priority.

RESOURCE PRODUCTION ALTERNATIVE

p. 3-26 **Special Status Plant and Animal Species**

152-18 The wording in this section of the plan does not reflect national policy of Bureau of Land Management with respect to candidate plant and animal species, i.e., candidate species are treated as if they were listed in all planning and management activities. The language in this section should be revised to reflect national policy (v. paragraph 1, page 2-59 and topic 1, page A-4).

PREFERRED ALTERNATIVE

p. 3-28 **Riparian Resources Management**

152-19 The Colorado Natural Areas Program supports special protection and enhancement measures for riparian areas.

Emphasis should be placed on maintaining and enhancing native riparian species. Consideration of sensitive species (e.g., Cleome multicaulis) should accompany any plans to increase waterfowl production.

p. 3-32 **Areas of Special Concern**

152-20 Elephant Rocks meets the importance and relevance criteria for ACEC designation and should be designated. The area requires special management to ensure that Neoparrya lithophila habitat is not degraded. Anticipation of difficulties in implementing appropriate management is not sufficient grounds for failing to designate. The criteria for designation (stated on page 2-44) do not include this criterion.

A creative approach to anticipated management problems (the area is presently used by local youth for recreational purposes) might include encouraging local interest in the area as a unique educational opportunity and a source of civic pride.

CNAP supports combining San Luis Hills and Flat Top Mesa in the San Luis Hills ACEC. The area should be managed to protect and enhance natural vegetation and rare plant habitat. Inventory and evaluation of relict plant communities in the area should be a priority.

152-21 The RaJadero Canyon area (map enclosed) is hereby nominated and should be designated to provide protection for Astragalus riplevi. RaJadero Canyon proposed ACEC meets all criteria for designation as an ACEC:

1) Astragalus riplevi requires special management to prevent listing as threatened or endangered;
2) type of management required would be decided in the CRMAP process;
3) RaJadero Canyon meets "relevance" and "importance" criteria by virtue of the bio-ecological status of Astragalus riplevi.

Enhancement of A. riplevi habitat and mitigation of existing threats to its survival should be a management priority in the proposed ACEC.

p. 3-38 **Special Status Plant and Animal Species**

152-22 The wording in this section does not reflect national policy with respect to candidate species, i.e., candidates will be treated as if they were listed in all BLM planning and management activities (v. paragraph 1, page 2-59 and topic 1, page A-4).

ENVIRONMENTAL CONSEQUENCES

p. 4-2 **Riparian Resources Management**

52-23 CNAP supports the policy of protection and enhancement of riparian resources on BLM lands, particularly with respect to native riparian and aquatic plant and animal species.

p. 4-3 **Lands and Realty Management**

52-24 All lands providing habitat for candidate and listed threatened, endangered, and sensitive plant and animal species should be retained in federal ownership. Any proposals to dispose of such lands should be reviewed by DOW, CNAP, and the USFWS.

Areas of Special Concern

52-25 The RaJadero Canyon area should be added to the list of nominated ACECs to be analyzed in each alternative in the RMP. The area clearly meets the criteria, as discussed above.

APPENDIX H

p. H-5 **Table H-2**

CNAP supports designation of San Luis Hills WSA as an ACEC and will cooperate with BLM in developing a site specific management plan.

p. H-6

52-26 CNAP supports designation of Elephant Rock as an ACEC. This area clearly meets the importance and relevance criteria in that it provides habitat for a federal candidate plant species. CNAP will provide assistance to BLM in developing a management plant for Elephant Rocks.

p. H-8

52-27 Los Mogotes contains a small population of Astragalus riplevi. The plant should be considered in all planning and management activities related to the area. Management emphasis on game species (critical winter range, etc.) on Los Mogotes conflicts with management necessary to preserve A. riplevi. Therefore, Los Mogotes cannot be considered a viable preserve for Astragalus riplevi. Another site must be chosen to provide for preservation and enhancement of A. riplevi habitat and to prevent the need for listing of the plant under the terms of the Endangered Species Act.

p. H-9 **Table H-3**

52-28 RaJadero Canyon meets BLM relevance criteria for ACEC designation by the presence of federal candidate plant species Astragalus riplevi. RaJadero Canyon meets importance criteria in that the plant is of national significance and is of special worth to the people of the United States. Astragalus riplevi is endemic to

volcanic substrates found between LaJara Reservoir and Tres Piedras, New Mexico. Evidence indicates severe decline in Astragalus riplevi populations in the past 30-100 years due to livestock grazing and herbicide application. Active management intervention will be necessary to prevent the need for listing as a federal threatened or endangered species. Management prescriptions for the proposed Los Mogotes ACEC are not sufficient to provide for the management needs of Astragalus riplevi.

p. H-9 **Table H-4**

152-29 Elephant Rocks is presented as a designated ACEC in the preferred alternative in Table H-4, but is not included as a designated ACEC in the preferred alternative text in the body of the report (v. page 3-32). This inconsistency should be resolved.

San Luis Hills WSA (Flat Top Mesa), Sand Castle WSA (Smithsonian cattleguard Folsom site), Rio Grande River Corridor, Elephant Rocks, and RaJadero Canyon meet ACEC criteria and the final RMP should include these designations.

United States Department of the Interior
NATIONAL PARK SERVICE
GREAT SAND DUNES NATIONAL MONUMENT
MOSCA, COLORADO 81146

IN REPLY REFER TO

L7615

November 21, 1989

Mr. Dennis Zachman
Bureau of Land Management
1921 State Street
Alamosa, Colorado 81101

Dear Mr. Zachman:

We have a few comments regarding the Draft San Luis Resource Management Plan and Environmental Impact Statement. Our comments are in regards to the area adjacent to Great Sand Dunes National Monument.

153-1 Air Quality - Great Sand Dunes National Monument is a Class I Air Quality area. The National Park Service is conducting air quality monitoring at Great Sand Dunes. We would be happy to make the air quality data available to you. Any activities that would impact the Class I Air Quality status should be considered in yourplanning.

153-2 Ground Water - Recent studies indicate that ground water levels and dune stability are related. While your plan does not call for major water development, we would like you to be aware that major changes in the watertable could have a drastic effect on the dunes - both those in the Monument and those lying outside the Monument on BLM lands.

153-3 Recreation Management - Off-Highway Vehicle (OHV) use south of Great Sand Dunes National Monument. We have several concerns in this area. Our first concern is how can OHV use be confined to the designated area. Our experience at the Monument is that constant patrol and enforcement is needed to prevent unauthorized use and vandalism of natural and cultural resources. Does the BLM have the enforcement funds and staff to assure the protection of the resources? If this area is administered by the State of Colorado, do they have the means to protect the resources in this area?

153-4 Unique plant and animal species habitat is a major concern in this area. For example, two interesting insects found nowhere else on Earth are found in the Great Sand Dunes area - the Great Sand Dunes tiger beetle and the giant sand treader camel cricket. Other specialized forms of life inhabit the sand dunes community, and some of them may be strictly local, still waiting to be discovered by future naturalists. Vegetation stability in this area is important to the movement of sand. Will OHV use alter the vegetation and allow for the erosion and movent of the soils?

Year of the Visitor

153-5 Finally, this OHV Recreation Area will border the Great Sand Dunes Wilderness Area. The primitive and wilderness type values must be seriously considered in contrast to the visual impact, dust and noise created by OHV use along the southwest boundary of the Wilderness.

153-6 Even though through out the plan there are statements about the negative impact of OHVs on cultural, natural and scenic values, the only specific OHV dune riding recreational opportunity is in a unique and valuable natural and cultural resources area. Are there alternative areas which would be less sensitive?

We are very interested in reviewing any future plans to manage this "Area of Critical Environmental Concern" (ACEC).

153-7 If future transfer of property to the National Park Service for management is to be considered there would need to be consolidation of scattered and isolated blocks of land into manageable units. Since these areas contain numerous cultural sites and are an important part of the dunes system, transfer to the NPS may be appropriate.

153-8 Archeological - We have documented incidents of archeological resource vandalism and theft along our common boundary in the Sand Castle ACEC. OHV use may adversely effect archeological sites and/or lead to increased site vandalism. Again the question is how can OHV use be effectively regulated and resources protected in this unique area. The southern boundary of Great Sand Dunes National Monument and the adjoining property is rich in cultural resources. The Cattleguard Folsom site is only one example of many sites in this area. Again, allowing unregulated access in this area may result in destruction or vandalism of cultural resources.

Thank you for the opportunity to comment on your Draft Resource Management Plan.

Sincerely,

William E. Wellman

William E. Wellman

1 MR. STEWART: Thank you. should I
2 use the microphone?
3 MR. CUSHING: Yes, please.
4 MR. STEWART: I have a handout here
5 and that might be helpful to you. My name is Doctor
6 Stuart. I'm a faculty member at Adams State
7 College, in the Geology Department there, and I'm
8 going to be looking at one issue here, specifically
9 it is the Sand Castle Area and the cattle guard
10 site, and what I'm going to be addressing is the
H1-1 11 issue of off-highway vehicle use.
12 It is currently in the plan,
13 scheduled to be a limited use area, and I would like
14 to propose that it be considered or that be altered
15 to being a closed area.
16 I have two reasons for this, or two
17 things that I want to address regarding why that
18 should change. The first one is scientific and it
19 is best seen by looking at this handout that I have
20 passed around, which is inappropriately labled down
21 below as a map showing the types of sand dunes in
22 the Great Sand Dunes National Monument.
23 If you look at that map, the Sand
24 Dunes Monument is actually a small portion the
25 northeast area of that map. The actual area that is

1 with me if I mispronounce some of these names, but
2 the first one the list is Abe Reylea, is that
3 correct?
4 MR. RELYEA: Right, R-e-l-y-e-a.
5 First of all, I would like to object to the hearing
6 officer bringing in people ahead of the ones that
7 were signed up first. I understood that if you
8 signed up, they were going to take them in order.
9 This gentleman comes in and
10 without ever asking the people that were signed up
11 first if he could be allowed to speak first. You
12 just, arbitrarily, brought him in here, and I don't
13 think that is right. I might not have wanted to hear
14 him. You are forcing to me to hear him by letting
15 him speak first. If you are going to conduct this
16 hearing, it should be done properly.
17 As far as the plan goes, I am
H2-1 18 objecting to wild and scenic river designation to
19 the lower part of the Rio Grande down by the line
20 here. That Canon is full of rattle snakes and you
21 don't know it and that's about all it's good for
22 down there, but when you designate that a wild and
23 scenic part of the Rio Grande River, then you are
24 shutting off all development, such as power lines
25 going across there and things of that sort that

1 would kind of increase the efficiency of our
government and be a hell of a lot more useful than
this plan they got here. Thank you.
MR. CUSHING: Thank you, sir. Are
there any questions?
MR. TALIAFERRO: Did we get his
7 address?
MR. RELYEA: It's on there.
MR. CUSHING: Bill Kopfman.
0 MR. KOPFMAN: Bill Kopfman, Center,
1 Colorado. Chairman of the Rio Grande Water Users
and have been for the past twenty years. Rio Grande
Water Users represent about ninety-five percent of
all waters that is diverted out of the Rio Grande
River and I am here in protest of the wild and
3-1 scenic river, especially since Abe mentioned the
7 loss of water, and that's what I'm here to try to
explain.
I think a lot of people that sit in
this room don't really realize how the river
operates, and how it runs. I say that about a lot
of you people.
I'm sure that you are not familiar
with how we got to make our river meet the Compact,
because we have an international treaty with two

1 would soon be in operation.
They also assumed that the
Wagonwheel Gap Dam and Reservoir were going to be
built and in operation. Both of those projects
would have helped supply water to an over
appropriated system.
7 The Wagonwheel Gap Dam and
Reservoir has never been built, as you know, and
probably won't be, and it has just been in the
recent years that the close basin drain project has
been in progress of being built, and still very
short on water.
We all know that any wild and
scenic river designation will include minimum stream
flows, and as Mr. Kopfman pointed out, the minimum
4-2 streams flows are going to come out of some water
users hide because the water is not available from
any other source, which will severely hurt the
economy of the entire valley.
Another thing we are concerned
with, if you want to look at the map, get into
Federal Reserve Water Rights, which is the subject
in the courts now, for example, the National Forest
to obtain Federal reserve water rights on the Rio
Grande River and the amount of -- in the amount of a

1 questions?
2 MR. ZACHMAN: No.
3 MR. TALIAFERRO: No.
4 MR. CUSHING: Mr. Barry Nelson.
5 MR. NELSON: My name is Barry
6 Nelson, address is Post Office Box 288, Monte Vista,
7 Colorado, 81144, Superintendent for the Rio Grande
8 Canal Water Users Association, which is the largest
9 irrigation ditch system in the Valley and the Santa
10 Maria Reservoir which has the combined most amount
11 of agriculture water used in the valley. I'm here
12 representing both of those companies. We are
H4-1 adamantly opposed to a wild scenic designation on
14 the Rio Grande River in Colorado.
15 Many of the reasons for this were
16 just stated by Bill Kopfman. As he pointed out,
17 there is no extra available water. The Rio Grande
18 River is over appropriated in Colorado. When the
19 Rio Grande Compact was made it put an additional
20 strain on the river, making it even more
21 over-appropriated, and at that time they realized
22 there was a shortage of water, and in the plan for
23 the Rio Grande Compact determining the amount of
24 water Colorado has to let go through to New Mexico,
25 they assumed that the close basin drain project

1 being blown away by the winds, so that water is
2 essentially being unused. It seems to me like there
3 is some real problem there somewhere.
4 MR. CUSHING: Any questions now?
5 MR. ZACHMAN: No.
6 MR. TALIAFERRO: No.
7 MR. CUSHING: Next on our list is
8 Melvin Getz.
9 MR. GETZ: I'm Melvin Getz, address
10 is 4876 East Road 3, South, Monte Vista. I'm here
11 reprsenting the Commonwealth Irrigation Company,
12 which is the company that operates the Empire Canal,
13 takes water out of the Rio Grande below Monte Vista,
14 runs on a southerly course all the way down to
15 Sanford; also has rights in the Alamosa River and
16 LaJara Creek.
17 I am here to talk against the
H5-1 designation of the wild and scenic river in the
19 lower end of the Rio Grande in Colorado.
20 Some of the points that I have to
21 make have already been made by Mr. Kopfman and Barry
22 Nelson. I think they are important enough to,
23 maybe, re-emphasize some of these points.
24 I think, as most of you know,
25 Valley Water Users have been laboring against or

laboring with the Rio Grande Compact for a number of years, trying to do everything possible to minimize the effect of that compact on the economy of the valley. It's been a real struggle.

I think over the years, every year we gain a little bit more knowledge about how to manage our water here in the Valley by doing different things to help us meet that number one priority, the river, which, in effect, is what the compact is.

It's the number one priority of the river, and it's a Federal compact and we must meet it. We all know that, nobody argues with that. We got to find ways to live with it.

Gradually, as we gain more experience as we have been able to get the water users in the Valley to work together, to cooperate instead of fight, we have been able to maintain a very good relationship with our Division Engineer. We feel he is doing a great job in helping us to work out measures which will allow us to meet that delivery and help minimize the economic impact of it.

H5-2 This wild and scenic river designation, in effect, may create a Federal

regulatory power over the river: you might say a senior water right. It will allow the Federal Government to maintain quality and quantity stream flows, and this will have a drastic effect on our economy in the valley.

I think in addition to the things that Bill Kopfman and Barry have already stated, about there is no water available to maintain a minimum stream flow without hurting somebody else, there are some other factors involved that I would like to point out:

Once this Federal water right is established all future water changes or litigation, court actions, and so forth, dealing with water, the Federal Government automatically becomes a party. They have an interest in that. There is these things going on all the time. We need to do these things to maximize the use of the water that we have and still meet the compact.

The type of things I'm talking about are plans of augmentation, exchanges of water, changes in points of diversion, appropriation exchanges in appropriations. These things are occurring all the time in our courts.

If you look at the Water Court

MR. CUSHING: Thank you, sir.

MR. ZACHMAN: No questions.

MR. TALIAFERRO: No.

MR. CUSHING: Judy Armagast.

MRS. ARMAGAST: I don't have another copy but I could give you what I have. I am Judy Armagast of Alamosa. We have lived in the San Luis Valley for forty-two years and have always enjoyed, along with our children, the many outdoor activities available in our huge Valley and it's surrounding hills and mountains.

I would like to thank the BLM for designating eight areas of critical environmental concern but urge the additional of a ninth one, Elephant Rocks near Del Norte to protect it's unusual rock formation, it's historical

H6-1 significance, and the rare plants found in that area. I also request that the BLM not allow any

H6-2 off-road vehicle use, or mineral leasing in all of the ACEC's. The untouched and scenic characteristics of the flat top Mesa and Pinion

H6-3 Hills ACEC's would be ruined by the construction of power line. I urge that power line not be allowed in those areas. I also recommended that the BLM

H6-4 extend the wild and scenic designation of the Rio

Grande River an additional twelve and one-third miles north to the La Sauces Cemetery. That twelve miles of the river is just as outstanding as that part to the south in all the aspects considered in designating wild and scenic river stretches.

Yesterday we received information from the Colorado Chapter of the Nature Conservancey that states, and this is quoted : "Rivers occupy a mere point two percent of the surface area in the state, yet they support up to sixty percent of our plant and wildlife species." I think that is an unusual relationship, and this is one of the main reasons why the additional twelve point three miles of the Rio Grande should be designated wild and scenic. Thank you.

MR. CUSHING: Any questions? Mr. Bob Myers.

MR. MYERS: I'm Bob Myers, and I am President of the San Luis Valley Cattlemen's

H7-1 Association, and I my main concern is with the wild and scenic river, and we are very definitely opposed to this designation for the many reasons that have already been stated, because of the concern over our water.

So, as far as the San Luis Valley

Cattlemens Association is concerned, we are -- we will not support the wild and scenic river designation.

As far as conservationist, one thing I'm concerned about, I don't believe there is anybody around that is anybody better qualified than the ranchers and farmers of the San Luis Valley as far as conservation is concerned. After all, that is our livelihood, and if we don't take care of the areas and the land we are out of business, so these are some of the concerns that we have with some of the programs, and I think one thing is in a lot of areas we put a little too much emphasis on recreation and not nearly enough on what it takes to maintain our land in good and workable condition. Thank you.

MR. CUSHING: Thank you, Mr. Myers. Any questions?

MR. ZACHMAN: No.

MR. TALIAFERRO: No.

MR. CUSHING: Charles Stillings.

MR. STILLINGS: I am Charles Stillings of 3671 South County Road 105, Alamosa.

18-1 I'm speaking against the proposed designation of a wild and scenic river from the New Mexico border

northward because I have seen, especially that private land in the San Luis Valley has been the most efficient means of improving the environment as far as greenry and as far as wildlife population is concerned here in the San Luis Valley.

Private land especially is supporting an ever increasing amount of wildlife. It is a private ranch on the Rio Grande river that has -- I believe this is still true although no wildlife biologist in the last five years to proof this -- it appears to be the largest roosting area for bald eagles in the State of Colorado. This is on private lands and these eagles were not here fifteen years ago.

The deer are thicker in population along the Rio Grande River per square mile than anywhere else in the San Luis Valley. The ducks feed upon the open piles of barley that are piled at elevators or private farms around the San Luis Valley. Far more is eaten by ducks and supported -- wild life supported in this way than is ever blown away.

Therefore, I feel that private means should be encouraged to improve our environment in these ways and means should be made

better available for the public access to private land with remuneration, probably, because of the expenses involved of supporting this wildlife than to see an expensive government bureauracracy put in a thing which currently supports little else besides rattlesnakes.

A second point is that western water is essentially a property right. I'm not sure how much the Federal Government, in their organization, understands this, because most of the government employees naturally are from the east, as is most of the United States population.

Therefore, not only is there an over-appropriation of water but it's not the government's to have, and there has been little success in seeing this adequately transferred in examples that I have seen in my short lifetime.

Any projects currently under way to augment this situation of over-appropriation merely augments the lack of water. They do very little to alleviate the water shortage.

The San Luis Valley holds a relatively unique place in American agriculture and

18-2 I'm addressing this because I think we haven't addressed here today the economic significance of

what taking more of the water away from San Luis water agriculture will do.

I think that if our agriculture that's based here in the San Luis Valley, it would be felt nationwide because we provide very significant things that are difficult to obtain anywhere else for agriculture nationwide.

We have been an excellent seed potato production area. For a while California depended in a large part on the San Luis Valley for seed potatoes there, because of our altitude and our dry climate. Unique things to us, being the highest agricultural Alpine Valley in the worlds. The bacteria, insects and fungopests doesn't survive here as well, and we can raise a pure product. This extends to nationwide companies which depend, in large part, for their raw materials, such as Coors for their products.

Therefore, I think that things that damage our agriculture damages the entire nation's food supply, and I would second Abe's comments at the beginning, our world environment has a tendency to be vulnerable to not producing enough for the world population, and I don't know how far we can extend this, as far as world hunger is

things.

I have spent a tremendous amount of time in that canyon, and while it is a beautiful place, I'm concerned and have a number of questions about this designation that I don't think have been addressed. I haven't spent a great deal of time in the publication by the BLM but I missed the first part of the meeting and I apologize, I don't know if there was a presentation at the first part of this.

H9-1 I don't think anywhere in here, at least that I have seen, is there a discussion or -- any kind of recommendation or conclusion as to what wild and scenic in any form, whether it's wild or scenic or recreational will mean to the users in the San Luis Valley.

I don't think, or I haven't seen whether or not it includes stream flows or water quality standards, and if I have missed it I apologize, but I do think that part of the anxiety and the comments that I have heard here today are directly related to what is the effect going to be on the water rights holders in the San Luis Valley, H9-2 what is the effect going to be or try to be on the Rio Grande Compact as it's written. H9-3 What are the water quality standards. How will it affects the

close basin project and it's operation.

Again, I apologize if I missed it, but I think that is a tremendous amount of work and discussion needs to be had before anything is done in a group like this, except much more extensive to provide the users in this area as well as others, the information that they need to evaluate what this is going to mean and how it's going to impact them.

If there are water quality standards, if there are a flow standards or minimum stream flows, or whatever, I think it is owed to the users, especially, water right owners, as well as people responsible for the administration of those waters rights to know up front what BLM is suggesting.

I have ridden through the wild and scenic, through the scenic area over on the Rio Grande in the Taos box, it's a beautiful place, looks like downtown Denver, 16th Street Mall when I was there. It was the farthest things from the wild and scenic river as far as the number of people that I have ever seen.

If that's what we are suggesting for the box in Colorado, then I'm greatly opposed to this.

quite up front with what they consider and what the law considers the wild and scenic designation, that may include users sitting in this room

MR. ZACHMAN: You want more specific wording on water quality and stream flows?

MR. VANDIVER: Stream flows and what the BLM is going to do. All I hear is, "where is the water? Why aren't you turning more water out. We have rafters that need that water." And I understand that because that is what business they are in in New Mexico, but it defies the imagination to the lack of understandsing that was spoken about earlier about the existing system that have spoken for that water.

I guess I would like there to be quite a dialogue before anything is done for, number one, the BLM to fully understand it and, number two, to -- if they are going to pursue this to work within that system to either buy water rights, or H9-4 whatever, if they are expecting some kind of flow through that reach of the river. Thank you.

MR. CUSHING: Any questions?

MR. ZACHMAN: No.

MR. TALIAFERRO: No.

MR. CUSHING: Thank you. Elise

would urge the BLM not only to designate the river south of the highway and to the New Mexico border as H10-1 wild and scenic but also the twelve point three miles north of the main road that crosses in that part of the country, as Scenic river, to La Sances Cemetery.

MR. CUSHING: Thank you. Any questions? Margaret Robertson.

MS. ROBERTSON: I work with Rio Grande Realty in Monte Vista, Colorado, and I am speaking, primarily, for myself, although the people that I work with, I think, share my opinions.

I didn't know anything about this, I know a number of other people were not aware of it either until two nights ago, I believe, at a water district meeting. One of the people I work with happen to be at that meeting and there are a couple concerns that I would like to share. Number one, I agree with the other people who have been here and H11-1 virtually all the reasoning that I have heard that there is no need for this wild and scenic river episode.

I do farm and ranch real state. I believe in property rights and I believe I think it was entirely appropriate that Mr. Stillings

opposition to the BLM acquiring any further amounts of land within the San Luis Valley. Thank you.

MR. CUSHING: Thank you. Any questions? Next is Cliff Hartman.

MR. HARTMAN: I am Cliff Hartman, 85 El Camino, Alamosa Colorado. I am here on behalf of the San Luis Water Conservancy District. We represent quite a large area here in the valley, and due to the fact that a lot of our work has to do with augmentation I think we become very conscious of the shortage of water that exists in the San Luis Valley.

The other thing, I came into this public hearing completely in the dark. I have held a lot of hearings in my life but usually the people knew what was going on when they got there. I don't know what kind of water demands they are going to make, I don't know what is expected from us, but anything that means we are going to have to tie up more water I think that we would be very much opposed it.

12-1

And certainly I didn't have any prepared remarks because I thought another gentleman was going to speak on behalf of the Conservancy District, but we would certainly endorse everything

(phonetical) Reservoir and the river, minimum strear flows in certain areas that tie you down or keep you from progressing as a conservancy district, and the good of the people of that particular area, using the priority system in Colorado.

Every time that you need to go to congress or any matter that would require some cooperation from legislators it seems like there is a group in Colorado, a coalition that understands only environment, and they club you over the head, and they just seem to take advantage of their present rosy position in the states, and I don't know that anybody is any better environmentalist than ranchers. We love where we are at and out of doors and what we do and try to take care of what we are using.

But, they always come in the back door and say, "Well, if you want to do this or want to do that then we want an amount of feet in the river or so much storage," or any other method that would take from the people of their personal water rights, and, therefore, as Conejos representative, I heartily opposed any designation of wild and scenic on the lower reach of the Rio Grand, and I thank you.

H13-1

there has been an official study performed yet or not, but I believe that was the discussion that night. Barry brought up a real critical issue that I would like to bring up again, and maybe go into a little bit more in depth.

He mentioned the issue of the wildlife refuge. There is one conflict that I see and that's the conflict of interest in the Federal Government.

The close basin project was authorized by the U.S. Congress and that authorization was very specific on the operation of the project and allocation and the way it would make its delivery.

If the Bureau of Land Management's effort is to, in any way, change the in-stream flows of the Rio Grande by the wild and scenic designation or to set new standards on the water quality of the Rio Grande on lower the reaches, it's very much in conflict with what Congress has already done with the close basin project.

15-1

That project does not only deliver water to the Rio Grande but also to the Blanca wild life refuge, which is managed by the BLM, and also

delivered water to the Alamosa National Refuge.

It would appear to me if there is any attempt by the BLM to, in there designation of wild and scenic stretch of the lower Rio Grande, to regulate in-stream flows or water quality, that there is a great conflict, and I think the issues need to be discussed further between the government bodies.

H15-2

I think that you, the BLM, would be remiss in proceeding any further with this designation without this. Thank you.

MR. CUSHING: Thank you, Mr. Kopfman. Any questions? Anyone else?

MR. TEEM: I wasn't going to speak but I have to do this. I'm Robert Teem, 7525 Route 3 South, Alamosa. I am a member of the Rio Grand (Water Association, board member, represent Costilla, Ditch Company, San Luis Valley Canal Company. I won't take much time but I want to go on record as opposing the wild and scenic river concept in the south reaches of the Rio Grande in Colorado.

H16-1

I did want to take exception to the first statement made by the gentleman who said he wanted to put the sand hills next to the sand dunes off limits to the an ATV's. I am over sixty years

1 old, and getting older, and have an ATV. In fact my
2 family has four of them, we ride them, we don't like
3 to be denied that right.
4 We ride them in that country up
H16-2 there, and we don't tear that sand up that bad, and
7 I'm opposed to making that area off limits to ATV's,
8 off road vehicles. I wanted to put that in. I
9 wanted this in as a matter of record. Thank you.
10 MR. CUSHING: Anyone else? If not,
11 we will close the hearing.
12 MR. CUSHING: Come on up.
13 MR. JONES: My name is Dave Jones,
14 P. O. Box 1452, Alamosa, Colorado. Speaking as a
15 geologist, but my own personal point of view. I
16 support Mr. Stewart and his recognizing the fact
17 that, in fact, the sand dunes are a very unique
18 geologic resource and the amount of burden that is
19 put on people not being able to drive in that
20 particular area, which is a hell of a lot more
21 unique than a lot of people seem to realize, I
H17-1 recommend that it do be protected from off road
22 vehicle use.
23 There are plenty of other places in
24 the Valley to use recreational vehicles without any
25 restrictions and nothing the going to be lost.

1 District.
2 I have three comment areas that I
3 would like to address. The first one relates to the
4 wetland development issues; the next one relates to
5 the suggestion of studies for additional minimum
6 stream flows and water quality data in the lower
7 river; and the third one relates to the wild and
8 scenic river designation.
9 With regard to the wetland issue,
10 there are three tracts of BLM property that are
11 addressed in the study that are of concern to my
12 client. The Blanca habitat area, the emperius,
13 e-m-p-e-r-i-u-s, tract, and the dry lakes. These
14 are addressed at 2-22 in the draft.
15 There is a suggestion in the report
16 that an additional eighteen hundred and five acres
17 of new wetlands would be developed in these areas,
H18-1 or should be developed in these areas. I want the
19 record to be clear, and I believe that BLM should
20 address the sources of water that are proposed for
21 the development of those wetlands.
22 The Rio Grande drainage is a highly
23 over appropriate. The aquifer system underlying the
24 Rio Grande, as you recognize at the beginning of
25 your report, are interconnected and affect the flow

1 of streams and rivers when utilized. The Blanca
2 habitat area currently has in excess of a thousand
3 acres of wetlands which have been recreated through
4 the use of wells drilled through the confined
5 aquifers.
6 Those wells, along with the
7 farmers' wells, have an impact on the hydrologic
8 regime in the valley and for the past fifteen or
9 twenty years no further well permits have been
10 allowed in the basin for private entities.
11 At the present time the Bureau of
12 Land Management, as all Federal agencies had, have
13 been joined by the State of Colorado under the
14 McCaren amendment and have been obligated regarding
15 water rights through State water right procedures.
16 It is necessary for the Bureau of
17 Land Management in this section, in order for it to
H18-2 be complete and accurate to address the manner in
19 which the water will be obtained for the development
20 of those wetlands.
21 Let me be clear for the report. I
22 am not here saying that there is opposition to
23 wetlands or the development of new wetlands or the
24 maintenance of wet lands. The district that I
25 represent is very interested in preserving the

1 wetland environment in the Valley and are involved
2 in a very extensive piece of litigation with other
3 water developers seeking to protect that wetland
4 environment, but there needs to be a recognition in
5 the record that there will have to be augmentation
6 of the stream system of other wetlands environment
7 on these three tracks if they are to be developed at
H18-3 the level you are talking about because there isn't
9 any water out there. It has to come from somewhere,
10 and when you take more water from the system you are
11 going to hurt someone and you need the plan for
12 augmentation, and I would like to see that
13 addressed.
14 With regard to the second point
15 that I addressed, there is a substantial amount of
16 water quality data available for the Rio Grande
17 river below Alamosa at several stations, data
18 gathered at, I think, several station by the USGS,
19 and other stations by the Bureau of Reclamation, so
20 insofar as water quality in the Rio Grande, there is
21 ample information and there is more developed all
22 the time.
23 In my judgment, for the Bureau of
H18-4 Land management to be seeking affirmatively to
25 acquire, or require minimum stream flows in that

region is inappropriate. The minimum stream flow program in the State of Colorado is operated by the Colorado Water Conservation Board. There are statutory and regulatory limits on how minimum flows are to be obtained and protected.

I want to emphasize for the record that there are no, what I'm going to call, natural flows occurring in the reach of the Rio Grande below Alamosa during most of the year. That water you see in the river is almost exclusively return flow from irrigation practices along the river coming back through the stream system and off of the adjacent property.

The primary source would be watering of the Rio Grande river, and below the river is the Alamosa National Wild Life. They operate the Senior Chicago ditch whenever the river flow is low enough, and when there is extra water in the stream other rights takes what's left, so insofar as there is a need for in-stream flows, or a desire to keep water in the Rio Grande.

H18-5 You need to address within your document how you intend to interface with your fellow agency, the Department of Interior, that controls the source of water coming through Alamosa

into the rest of the river reach.

You need to be sure that you -- there isn't an implication in your report that you are going to use other mechanisms to obtain the water from other agencies of the Government or the local citizenry. H18-6

There is a suggestion that both the Rio Grande and Conejos are grossly over-appropriated and only water that goes out of Colorado is water which is delivered to the downstream states by the Rio Grande Compact, and water users would be very sensitive to any suggestion that their rights be changed or in other ways affected in order to preserve those flows.

Finally, there is a suggestion in your draft that the Close Basin Project could be operated to provide the miniumum stream flows. That water is owned by the Rio Grande Water Conservation District and the use of the water can only be obtained through the agreement and cooperation with that district. H18-7

I believe that the draft should be amended to reflect those facts. It would be inappropriate to suggest that one of the purposes of the Close Basin Project is currently or can be at

the present time the maintenance of in-stream flows in the reach below the project outflow.

One of the other beneficiaries of the project, incidentally, is the Bureau of Land Management at the Blanca habitat area in the Alamosa National Wildlife, water is also delivered there.

Finally, it is the position of the Rio Grande Water Conservation District that the concept of a wild and acenic designation for the last eight point eight miles of the Rio Grande is inappropriate at this time and would be opposed by that organization and people that it represents, and believe the statements concerning flows and quality at E4 in the draft to be overly broad and does not appear to be supported by any technical data. 18-8

In fact, it appears to be inconsistent with the statement earlier in the body of the report where it's suggested that additional study concerning quality and quantities of the water within that reach is required. A full fifty percent, as the report recognizes, of the reach is in private hands.

In addition, the study draft, and 18-9 particularly attachment E to the draft, do not identify how the Bureau of Land Management proposes

to deal with the potential for upstream impact caused by the designation of that eight point eight miles as a wild river.

It is absolutely critical to the citizens of this Valley that the Bureau set forth what its proposal would be for managing the wild and scenic river corridor, if one were established. H18-10

Again, let me say that I am not here to say that you cannot and should not have intensive management of the Colorado portion of the Rio Grande box, nor am I hear to say that the people that I represent don't want to see that segment of the river protected, but they are very cognizant of the raconian effect of the wild and scenic river on upstream water rights, both as to quality and quantity if the wild designation is put in place by the Congress without terms or conditions. H18-11

The people I represent are also aware that in other parts of the country where downstream segments, and by that I mean wild and scenic river designations below pre-existing man-caused alterations of the hydrovolic (phonetical) regime exist, Congress has been able to provide terms and conditions to a designation which protect the existing economy, protect the towns,

1 communities, farms, industries against the use of
2 the wild and scenic river designation to influence
3 how water use occurs.
4 I would like like to see the Bureau
5 of Land Management address that, at least talk about
6 it. Your draft, because the draft as it exists,
7 this is one area where, in my judgment, you haven't
H18-12 gone through the analytical process that you need to
9 to tell people of the San Luis Valley what the real
10 impact of the wild designations are.
11 You haven't talked to them about what
12 the effects would be on sewage treatment of the
H18-13 communities, whether or not there is a potential
14 that the communties would be charged to upgrade the
15 quality of the existing sewage treatment to benefit
16 the quality of that reach.
17 I'm not saying that's bad but
18 saying you need to tell them about it so they
19 understand. You have need to explain to them
20 whether or not BLM would propose or the wild and
21 scenic statutes would permit the BLM to insist upon
22 changes in the hydrologic stream. Only after you
23 have done that are they in a position to actually
24 comprehend your recommendation that the last eight
25 miles be designated as a wild stream.

1 The first one has to do with the
2 changed area on the side of Mountain Blanca. These
3 have been in existence for quite a while. The area
4 to the north seems to becoming back quite rapidly
5 and to south the area, well, it's still about the
6 way it was several years ago.
7 I, honestly, believe from a
8 standpoint of having done studies in the area, that
H19-1 it would be a waste of time and waste of money to
10 try to go up and scalp those edges to make it blend
11 in.
12 I think given enough time, another
13 twenty years or so, I think these things are not
14 going to be as obvious as they are now. In fact
15 they are becoming less so as time goes on.
16 Second one has to do with Sand
17 Castle area. I realize other people are going to be
18 speaking about this. This is the area to the west
19 of the Dunes proposed for all terrain vehicle,
20 off-the-road vehicle recreational area.
21 I'm opposed to this for several
22 reasons. The area is a fairly fragile and sensitive
H19-2 area and I'm afraid that even with moderate traffic
24 out there of all terrain vehicles we are going to
25 see irreparable damage done to that area from the

1 stand point of plant ecology. This is a delicate
2 area and I'm concerned about that.
3 Recently -- it has been a while
4 since I have been there, six or eight months since
5 last spring -- there were elk and deer in that
6 particular area, which came as kind of a surprise to
7 me. You get the all terrain vehicles out there I'm
8 afraid they are going to be begin to harass the
9 animals, and this has been a problem in other areas.
10 Another thing I probably should
11 refer to Doctor Sanford, but I am going to mention
12 it, at least, is the possibility of a reasonably
13 large number of early-man sights in that area, and
H19-3 any kind of surface vehicles in that area, I feel,
15 would tend to damage these or perhaps lead to more
16 serious artifact hunting, and I'm quite concerned
17 about that. These are my concerns. Thank you.
18 MR. CUSHING: Thank you, sir.
19 MR. TALIAFERRO: I have a question.
20 Do you feel it reasonable that the entire area needs
21 to be closed off for vehicles or do you believe that
22 the best of worlds, both worlds, can be involved?
23 MR. DIXON: I don't believe so.
24 One of the serious problems that could result from
25 this, or potentially problem, is the fact that these

1 all terrain vehicles would have access to the Great
2 Sand Dunes, and there is no way you can keep a fence
3 out there.
4 Right now you can see where fences
5 have been covered. In fact one area last spring you
6 can see three fences on top of each other where they
7 tried to build a fence and the sands came, then
8 build another one and sand went out.
9 I don't think there is any way to
10 keep those people out of there. That is a
11 wilderness area. I think the whole area should be
H19-4 closed, because it is a very sensitive ecological
13 area.
14 MR. TALIAFERRO: Okay.
15 MR. CUSHING: Thank you. Any
16 questions? Mr. Sanford.
17 MR. SANDFORD: My name is Dennis
18 Sanford. I'm Curator of North American Archeology
19 for the Smithsonian Institute, and I came tonight
20 without a prepared statement. Primarily, I wanted
21 to see how these transaction were going to function.
22 What I would like to say, and
23 particularly second what Doctor Dixon has said, that
H20-1 I think that any utilization of the Sand Castle area
for all terrain vehicles would be extremely

dilitorious, not only to archeology but to the ecology as well. It's an extremely fragile area.

Also it is an area that has, for the last eleven to twelve thousand years was under the occupation by Palo Indians up to modern Indians in this area.

Primarily the ATVs that go out there now are, in fact, out there for the sole purpose of artifact collecting, and I think that something should be done to control this wholesale damage, and believe me, it has been wholesale damage to the prehistoric record of the Valley, and let alone open it up for general use by ATV people who would then come in from all over wherever and would increase the volume of that traffic out there, I think, tremendously. 20-2

I think if you go to some of the areas that have been opened up for ATV use you will see exactly what kind of damage that can result from these ATV vehicles.

I think what the BLM ought to look for, if they intend to pursue this sort of land management policy, is they better have an extremely large purse, because it's going to take literally millions of dollars to mitigate the archeological

MR. KENNEMER: I got here a little late. I found out about this meeting through the Colorado Environment Coalition, who I'm currently working for over in LaVeta, where I reside, and working on the wilderness bill sponsored by Tim Wirth, and I have been busy and got off work and went over and fed the kids and dashed over.

Basically, I wanted to say that I'm pretty new to this part of Colorado, but I have been managing to get over here to the San Luis Valley and enjoy the Sand Dunes and experiencing some of the wild lands here.

What I found is that so much of the wild lands have been disturbed by all terrain vehicles, by the wholesale looting of the archeological sites in the development of the wild lands that are in this part of the State and this part of the country, and it bothers me because it seems that it's becoming more and more the exception that we have lands set aside for educational and archeological study, more and more the lands that are set aside for just wilderness, for wildness habitat, the type of recreation, low impact, horseback riding, foot travel, all that is too rare.

I would like to ask the BLM to not H21-1

allow any further grazing or expansion of grazing on BLM lands in this study area that we are discussing tonight. I would like to ask the BLM to avoid any power line development through these areas, as it would disrupt, not only the scenic quality, but also could have an effect on wildlife. 1-2

I guess the part that really concerns me is the Rio Grande River. I'm on the Library Board of Directors at LaVeta, and missed a meeting, and -- but a lot of the people there are fond of the Rio Grande area, and particularly our librarian said, "you can miss the meeting tonight because that area is in dire need of protection. Get over there and tell the people not only to protect the eight point eight miles, but extend it up to at least another twelve to fifteen miles." 21-3

I guess that, in general, is it, but I wanted to let you know that there are people on the other side of the peaks concerned about this part of the state also.

MR. ZACHMAN: One question. You said the area you are serving is ACEC?

MR. KENNEMER: Yes, all the wilderness study areas in the ACEC.

MR. CUSHING: Thank you. We don't

have anyone else signed up to speak. Is there anyone else that would like to make a statement. If not, why don't we take about a fifteen minute recess here and see if anyone else shows up.

(Fifteen minute recess taken.)

MR. CUSHING: Well, let's take our seats again. We will reconvene the hearing. I just want to remind everybody that this is a formal hearing and that the verbatim transcript is being taken. When you come up to give your testimony please state your name and address to the recorder and when you are done wait just a second. The folks here at the panel may want to ask you some clarifying questions.

MR. RICHMOND: I am Don Richmond. I have a very brief statement. I just was informed of this meeting today and do not -- have not had time to study a whole lot about it. I would like to say that I would be very much in favor of as much of the Rio Grande being set aside in some way as a wild and scenic river or -- I'm not sure of all the possibilities or the -- what the options are there, but I'm quite familiar with that little section from about Sanford south through Las Sauces and through that whole little section of BLM land down there. A H22-1

acquisition.

I would like to commend the BLM on their identification of areas of critical environmental concern. I think that this is the best job I've seen yet in a resource management plan as far as identification of ACECs. As I've worked very closely with Dave and other members of the BLM staff on helping identify areas, we were just very impressed with the areas that were identified.

We, however, the areas that are being recommended for designation, we would like one other area included in that. Elephant Rocks Area, it -- not only does it have unique rock formation, it's also home to a number of plant and bird species. Has historic significance also. We feel it easily met the requirements of an area of critical environmental concern. I know the State also supports a designation of that as an area of critical environmental concern. We support their recommendations.

H26-10

With the lands or with the potential increase of livestock numbers outlined in the plan, I guess using intensive grazing management techniques, things of that nature, we would like to see a greater proportion of that go to wildlife instead of

livestock; that AUMs that are generated -- additional AUMs that do occur there, we would like to see that the vast majority of those go to wildlife, and start gearing up the, more of the forbes available within the resource area for wildlife rather than livestock.

H26-11

We're opposed to the plan to permit a utility corridor, the Taos power line to go through the Rio Grande corridor through the Flat Top Mesa and Pinon Hills Wilderness Study Area. There has to be a better route for public lines. I know the Public Service Company and the BLM don't want to go back and find another corridor. We think it would just be the wise thing to do. These are the lands identified in there. The corridor is going through some of the most outstanding lands within the resource area. It's absurd to have a utility corridor proposed for that area.

H26-12

And with the Rio Grande River designation, we were happy with BLM's recommendation of 8.8 miles of the river for wild and scenic river designation. The area obviously qualifies for that; has some of the most incredible raptor populations I have had the experience to see.

You are probably going to have some problems with water loss down in the San Luis

Valley. With that, we think it was a gutsy decision, one that will protect the resource there. Hopefully we can begin working with some of the water development interests in that area to ensure a stream flow in that area and work for designation.

The Coalition is more than happy to work with the BLM in that, however, we do feel that the 12.3 miles from Lobatos Bridge to Lasauses Cemetery also has outstanding remarkable values which are very different from those within the section being recommended. I had the opportunity this summer to canoe that stretch of river from Lasauses Cemetery on down through the -- on down to what is the Red Cart takeout, and the upper stretch has some very outstanding characteristics. The Browning Hills area has interesting raptor populations. Also it's very different from the Lava Flow Canyon that you find below.

In addition, one of the concerns that a number of people have had with designating the lower stretch for wild and scenic designation is that the increased recreational use may affect the raptor population in that area because it's such a closed-in canyon. I think by adding the upper stretch from Lasauses Cemetery on down that you can distribute

H26-13

some of that use further up and get people using that more for recreation and protect the lower stretch for wildlife. And we would recommend that you do that. I appreciate this opportunity to comment. Thanks.

HEARING OFFICER CUSHING: Thank you. Any questions?

MR. ZACHMAN: One clarification on your acquisition. You may want to refer to Map 2-16 in the book that shows the land tenure opportunities for acquisition. On page 3-31 it does outline the criteria for -- on what would be given priority in terms of the acquisition program. So you might want to check that.

MR. KOEPSEL: Thanks.

HEARING OFFICER CUSHING: Thank you, Kirk. Next is Dan Thompson. Is it Don?

MR. THOMPSON: Don. My name is Don Thompson. Address is 1380 Lawrence Street, Suite 1050 in Denver, 80204.

I want to thank the BLM for having this hearing in Denver. I appreciate the opportunity to speak and appreciate the convenience of not having that as an excuse for going down into the San Luis Valley.

I think it's very appropriate that the

1 losers if that's the case. The losers will be
2 farmers and ranchers that depend upon the water for
3 a living.
4 I might make a notation here that
5 if a rancher or farmer is displaced by the loss of
6 his water, then that will in turn create a job
7 opportunity somewhere else besides the San Luis
8 Valley. The Valley itself is not a very good
9 prospect for job opportunities and any time that a
10 rancher or farmer is displaced, they usually seek
11 employment elsewhere, and this normally means the
12 larger cities.
13 This kind of thing boomerangs down
14 the line. We would like to see the status quo left
15 as is. I believe that the wild and scenic
16 designation is great for some areas, but for the
17 lower Rio Grande as the area you are discussing, we
18 feel very strongly that any time you go to try to
H23-1 keep minimum stream flows you are depriving someone
20 of their water rights, and this is very critical
21 here in the San Luis Valley.
22 We have an average rainfall of
23 approximately six and a half inches and you cannot
24 make a crop on that much water, so we depend solely
25 on irrigation water for all of our livelihood here.

1 development. I support riparian demonstration
2 projects that are mentioned in the text, ones in Fore
3 Creek, Baxter Creek and Poison Gulch.
4 I am the Water Quality Chairman for
5 the Sierra Club Rocky Mountain Chapter. One of my
6 chief interests is in riparian restoration and
7 protection in general. And I have been encouraged by
8 efforts by the BLM, in this resource area and others,
9 in the beginning the long process of dealing with
10 that properly.
11 I am particularly encouraged by the
12 efforts the BLM is making to work with private land
13 owners in the area, particularly ranchers, people who
14 have allotments to enhance riparian values. I'm, in
15 particular, aquainted with the Whitten Ranch in the
16 valley, what they are trying to do. It seems like an
17 encouraging effort.
18 One of the aspects of riparian that I
H25-1 would urge the BLM to have more restrictions on, on
20 usage by ORVs in riparian areas. People who have
21 studied the history of the development of riparian or
22 arroya formation, men's roadbuilding, whether
23 deliberate or accidental, to the stream channel is a
24 cause of accelerated erosion. So I would urge you to
25 be more careful in that score.

1 builders, that it's your turn to be reasonable. It's
2 your turn to start compromising.
3 The BLM is the custodian of millions
4 of acres of western lands, most of which is
5 breathtaking in its beauty and grandeur. Equally
6 important, however, is the rich biodiversity which
7 must be preserved for the biological well-being of
8 our planet. I strongly urge the Bureau to do better
H24-1 in protecting the eight areas of critical concern
10 from damage by mining exploration, off-road vehicles.
11 The BLM must also stop the grazing of livestock in
12 these areas of concern as considerable damage is done
H24-2 by livestock to important riparian habitat and
14 overgrazing encourages wheat intrusions and soil
15 erosions.
H24-3 I ask that the Elephant Rock area be
H24-4 added to the list of ACECs, and I oppose the
construction of the Taos power line through these
sensitive and beautiful areas. I also ask that 12.3
20 mile stretch of the Rio Grande from the Lasauses
H24-5 Cemetary to the Lobatos Bridge be added to the 8.8
22 miles now proposed for wild and scenic designation.
23 Opponents of wilderness must be made
24 to understand that wilderness areas are not there
25 just for people. Wilderness areas are there to

1 On the issue of wild and scenic river
2 status for the Rio Grande River. I have -- certainly
3 support the BLM intention to study 8.8 miles in the
4 lower section in Colorado for designation of wild and
5 scenic river status. I would suggest, however, after
H25-2 looking at the maps, and that I still think it useful
7 that another 12.3 miles up to Lasauses, I believe is
8 the name of it, be also studied for that purpose.
9 I was struck on those maps by the lack
10 of riparian vegetation in that -- the stream miles,
H25-3 and that's certainly I think a -- where some
12 improvements could be made, presumably controlling
13 grazing. I think if that riparian enhancement went
14 forward, then those areas would be even -- have more
15 recreational value.
16 Wild and scenic aspect. One important
17 aspect of wild and scenic, a lot of the rivers that
18 are used for recreation on BLM land are becoming
19 saturated. One that comes to mind is the Arkansas
20 River near Buena Vista. Saturated is certainly the
21 proper word for it. Oversaturated is better. I
22 don't know how much activity the Rio Grande gets in
H25-4 that stretch, but I think it might be useful for the
24 BLM to promote a more recreational use. Certainly
25 the wild and scenic river status would help that. I

think it would also help the local economy, which has a reputation for being not very good. I think that's all the comments I need to make.

HEARING OFFICER CUSHING: Thank you, Mr. Cunningham. Does anybody have any questions? Thank you. Next, Mr. Koepsel.

MR. KOEPSEL: My name is Kirk Koepsel. I am the Public Lands Coordinator for the Colorado Environmental Coalition, located at 777 Grant Street, Denver, Colorado 80203. I would like to start my comments out talking about the oil and gas leasing section of the plan.

You might or might not be aware of, the General Accounting Office just finished doing a survey of 63 forest plans and BLM plans in the western U.S. They have found one plan out of those 63 plans which they felt adequately met the -- what they felt was required under the National Environmental Policy Act in the Mineral Leasing Reform Act that went through 32 years ago. They found one plan that was in compliance with these laws, after their analysis. I think that the San Luis plan would also be found to be in noncompliance.

There's two areas that I think need to be looked at more closely regarding oil and gas. One

is a better analysis of what cumulative impacts could occur within the resource area. That's something I just felt the plan did not do an adequate job on at
H26-1 all. There needs to be more analysis looking at development in areas, things of that nature, regarding the cumulative impacts of oil and gas leases.

There's also a number of special areas that we think oil and gas leasing should not occur in. The first is areas of critical environmental concern; that BLM identified a number of these areas in the resource area that they recommended for
H26-2 designation in the draft plan. These areas we feel should be off limits to oil and gas leasing, at the minimum, have a no surface occupancy designation, but we would prefer just having having a no lease option used in those areas.

Another area that we feel is very important are special recreation management areas and wild and scenic river corridors. The Rio Grande did
H26-3 receive a no-surface occupancy designation, but once again, we would prefer no-lease in those areas, mainly because there could be impacts from directional drilling from outside of the area within the viewshed, or something of that nature.

Riparian areas need to be excluded from leasing as well as perennial streams. If
H26-4 there's municipal watersheds or critical watersheds located in the resource area, we would like to see those removed from the lands available for leasing.

Another concept that the Forest Service is using in their Pike/San Isabel oil and gas lease amendment is to have corridors along public highways in which a lease surface occupancy will not
H26-5 be permitted to protect the viewshed along public highway right-of-ways. We would recommend BLM do this. Also as well as in areas where there may be scenic vistas along highways or trails.

I sent a comprehensive letter we would
H26-6 like to see included, in March 1988, because the plan failed to address many of our concerns.

With regards to the riparian management I am also very impressed with the -- what the plan calls for in riparian management. It -- I think it really represents a shift within the agency on taking riparian management seriously, and I am glad to see that you've included those improvements in the draft plan. There the plan did say that there would be another, in addition to the lands that will be either upgraded or are already in good condition,

that there will be an inventory of an additional 1,413 acres of riparian or of potential riparian lands. If these lands are determined to qualify as
H26-7 riparian, we think that there needs to be provisions in how the Bureau of Land Management plans on improving these areas also.

The coalition is not real happy with the BLM designating the Clayton Cone area as a fossil collecting area. I think we have gone beyond the
H26-8 point where our public lands should be open to this type of exploitation, although fossil collecting is a popular activity. We would support more of a interpretive program in the area, explaining the importance of fossils in that area and close it to any sort of collecting.

With regards to land and realty management, although the disposal sites were outlined, I was not able to find in the plan -- maybe it was just I missed it -- the acquisition areas being identified. I think that two of the areas that
H26-9 are of biggest concern to us are the lands along the Rio Grande and the areas around the Sand Castle area of critical environmental concern, as being acquisition areas. We would like to see both of those areas identified as top priorities for land

BLM has determined certain areas to be areas of critical environmental concern. Areas so designated need to be off limits to mineral entry, to mineral leasing, and to use by motorized vehicles. I believe that BLM should also add to the area of so designated, the Elephant Rocks area to afford it the additional protection necessary to care for the rare plants located there, and to protect the area for its historic significance.

H27-1

H27-2

The proposed power line project needs to be located so that it does not enter those areas which have been determined to be areas of critical environmental concern. Power line is not compatible with such areas. The BLM needs to see it's appropriately located away from from most areas.

H27-3

Most important of the proposed decisions is that all areas of the Rio Grande which qualify for wild and scenic river status should be so designated. I believe the management plan should recommend at least the 20 plus miles from the Lasauses Cemetary to the state line be included in the wild and scenic river program. Colorado has far fewer miles in this system than other states in the Rocky Mountain area. This needs to be corrected. Again, thank you for coming to Denver.

H27-4

HEARING OFFICER CUSHING: Thank you, Don. Any questions? Thank you. Next is Sarah Peapples.

MS. PEAPPLES: My name is Sarah Peapples. I live at 810 19th Street in Boulder, and I would just like to reiterate a lot of issues that have already been addressed. I guess they have been identified as the main points of contention in the plan.

I would like to suggest that the BLM keep all mineral leasing, mineral entry and off-road vehicles from within the ACECs. In terms of grazing, I would like to see more AUMs go to wildlife instead of livestock. The power line project is something I protest as well. It obviously goes through some very sensitive areas in a WSA that doesn't seem to be compatible at all. I also would like to suggest that an additional 12.3 miles north of the 8.8 miles already suggested for designation also be included in that recommendation up to the north, to the Lasauses Cemetery, as the raptor population in this area is equal to that found in the birds-of-prey area along the Snake River in Idaho, which seems to be a unique characteristic that would warrant its inclusion. Thank you.

H28-1

H28-2

H28-3

H28-4

HEARING OFFICER CUSHING: Thank you. Are there any questions? Kurt Manning.

MR. MANNING: My name is Kurt Manning. I represent the University of Colorado Wilderness Study Group, a group of about 50 active members. That's Campus Office 207, Boulder, Colorado, 80309.

First question was actually a technical question. I was wondering why this was held at the Roadway instead of State BLM office in Lakewood. Is there a reason for that? I was just curious because it seemed like they have excellent facilities.

MR. TALIAFERRO: That building, that particular building is a little bit hard to get to and find for people. This being at the corner of this junction, I think that's the only reason we really picked it.

MR. MANNING: I thought it might not be a bad idea to have it there, just to save money.

Anyways, I agree with the ACEC designation. I think that's great. In addition to what's been said, I think the Elephant Rocks area, which I have heard is of ecological and historical significance, should be added to the ACEC list as

H29-1

well, as far as protection within ACECs. It's important to certainly exclude all ORV use within ACECs and riparian areas as well. And at the vista ACECs, areas of critical environmental concern, I think, in the least, you have to have no surface occupancy, and, hopefully, more than that is no leasing at all within ACEC and critical riparian zones, as well as the same for mineral projects.

H29-2

The Taos power line project clearly as made, as many people pointed out, interferes with designation of certain ACECs. That should not be allowed. There may be more trouble to go back and look for it, a different corridor for that project, but I think that since it does clearly interfere with the idea of ACEC, that should be done.

H29-3

One last point, as far as the wild and scenic on the Rio Grande, I think that's excellent. It would be extremely nice to get the 8.8 miles down to the New Mexico border, at least, at the very least, study the 12.3 miles above that, up to the, I guess, the Lasauses Cemetary -- I am not quite sure how to say that -- just to please give some consideration to the ecological and riparian significance in that area. And that's basically the comments I have.

H29-4

1 addressed that question. I believe the BLM people
2 are not aware enough, maybe well meaning, but they
3 don't fully understand Colorado water law, which is
4 hard enough to do anyway.
5 Water is a property right. There
H11-2 6 would have to be minimum stream flows. Everybody
7 seems to be aware of these things at this point,
8 but, again, as somebody else has said, there has
9 been no compensation, no mitigation addressed.
10 People don't have enough
11 information even to make a decision. There has not
12 been enough for people to do that.
13 I used to live in Grant County. I
14 also used to live this Chaffee County. How those
15 river systems work are somewhat different than the
16 San Luis Valley. How the appropriation works are
17 different, but it is true everywhere in this State
18 that there is no more extra water.
19 For the Federal Government to
20 acquire water by fiat and not give anything back to
21 the private owners of it, that I think is a
22 violation of due process, and sooner or later
23 somebody is going to notice that. That's a personal
24 opinion.
25 I like to think I'm kind of an

1 environmentalist. One of the things I belong to is
2 Nature Conservancy, about the only one I do now.
3 When they want to approve -- to get a piece of
4 property they operate straight forward to get the
5 money together and go ahead and they buy it. One of
6 the projects they have recently completed is it in
7 Northern Colorado by Fort Collins. They bought
8 water rights in order to maintains minimum stream
9 flows for that land, which is a respectable, honest
10 way to go about it. They are not trying to pull the
11 wool over anybody.
12 I haven't heard anybody on this
13 project as to how it came back, why it came about,
14 who particularly wants it. Why the BLM has been
15 even -- who made the suggestion anyway on this. I
16 don't know that particular stretch of river.
17 I don't think I need to at this
18 point, because it very clearly is going to have an
19 effect on the farmers and ranchers in the San Luis
20 Valley. That is not right.
21 There are questions not being
22 addressed, and somebody last to sit up and notice
23 it.
24 Couple of other questions that I
H11-3 have are why the BLM is even discussing acquiring

1 additional land, evidently for wilderness purposes.
2 I have not had a chance to read the whole draft
3 report because I just got one when I got here, but I
4 notice throughout there are mentions of acquiring
5 more BLM land. I think that is a very inappropriate
6 thing for BLM to be doing. That is a different
7 issue than been duscussed, but I think it is part of
8 that hearing.
9 I would also like to point out --
10 just kind of stray thoughts as I have been sitting
11 here -- under Colorado law at this time there are
12 three recognized beneficial uses of water and I
13 think everybody in the room knows that recreational
14 use of water is not one of them.
15 I would remind people of that every
16 time we come across this -- right at the moment I'm
17 serving on a state committee for Colorado
18 Association of realtors. I didn't want to do it,
19 but I am, working on a water policy for that
20 organization.
21 So, a lot of these questions have
22 come up and some of these -- Charlie Jordan of the
23 Denver Water Board, Dan Lubke, with the
24 Environmental Defense Fund, have spoken, and Rollie
25 Fisher on the west slope.

1 So a lot of these things are coming
2 up. All over the State of Colorado there seems to
3 be more and more pressures put on any agricultural
4 water users. The water is not alone in that. This
5 is just one of many such issues.
6 I think we are going to see a lot
7 of more of them, and I think people are going to
8 have to remain alert to that. We know the Valley
H11-4 has threats to the water and I believe the BLM
10 should be a lot more sensitive to the local
11 residents.
12 I believe the recreational people
13 should be infinitely more sensitive to the values
14 and aspirations and the businesses and property
15 rights of the people who live in the area that they
16 want to recreate in. I am sorry to say I don't see
17 that in several parts of Colorado, the Valley is not
18 the only one.
19 I still have a bunch of questions
20 but I don't know that I get to ask any of them
21 today, so I would simply like to say that my primary
22 reason for being here is to say, yes, I do oppose
H11-5 there wild and scenic designation, not for property
24 value but for property rights reasons, as much as
H11-6 anything, and also I would like to state any

HEARING OFFICER CUSHING: Thank you. Any questions? Jerome Michel.

MR. MICHAEL: M-i-c-h-e-l, pronounced Michel. I live at 1551 South Kenton Street, Aurora. I'm quite impressed with the things in the plan that show a concern for the environment. The areas of critical environmental concern are certainly worth your attention. It seems to me to be incompatible with the idea of an area of critical environmental concern to allow any kind of development activity. In particular, it does not make sense to allow mining or mine leasing.

H30-1

I have been a resident of Colorado off and on since 1960. First coming into this state, I was delighted with the opportunity to buy a Jeep and go off road. It's a great adventure. As I've experienced the wonders of Colorado, I have since seen the damage that off-road vehicles do, and think it's totally incompatible to allow off-road vehicles in these areas of critical environmental concern. I think that off-road vehicles are best suited to roads with a lot of snow.

H30-2

The topic of the wild and scenic river designation for the Rio Grande, that's wonderful to see that in the plan. As others who have spoken

here, I believe that that designation should apply to a much greater stretch of the river, allowing the return of some of that area to a more natural state, and to provide areas for recreation for people from all over the state, for tourists from outside the state and for our future generations. I believe that's all I would like to say at this time.

H30-3

HEARING OFFICER CUSHING: Thank you. Last on our list is Henry Gibb.

MR. GIBB: My name is Henry Gibb. The address is Box 332, Conifer 80433.

Members of the BLM, thank you for the opportunity to be here. I would like to speak not so much from a personal experience, but a specific area, from a bit more of a philosophical base. I teach young people. I work as a high school teacher in Jefferson County schools. I speak with students a lot about their aspirations and their thoughts and hopes for the future. I am worried about that. I see them as angry, impatient, too often verging on cynical. They wonder what's going to be left for them. They wonder with good reason.

I would like to commend you for the aspects of the plan, which include the ACECs, which appear to meet some of the very critical, important

environmental special areas in this region. I think we need to look very carefully and divide your attention very carefully between kinds of impacts which will be permanent impacts, irreplaceable impacts and impacts which will be -- can be subject to change.

Such things as the Taos power line through this area represent absolutely permanent impacts, ones which our generation and future generations cannot change. We need to look at alternative routes for that corridor. We need to look at cost/benefit ratios which take into account the aesthetic and scenic values of an ACEC. Likewise, motorized off-road use has a present tendency to create erosion, scars and trails which are followed by other motorized and nonmotorized users which cannot be changed in the future. We need to save these few corners that we still have for our children and for their children, should they want to have the connection with the wild lands that we have had the opportunities to have.

H31-1

H31-2

H31-3

I would like to suggest the addition of Elephant Rocks to the ACEC. My understanding, there are sensitive and rare plant communities which would benefit from protection.

H31-4

So, for that reason, I am pleased to see such an emphasis on ACECs, such a large proportion of the acreage that you manage being given some kind of protection, and I would urge you to go the next step and to prevent overuse of ORV use of those areas. To do this kind of protection that would prevent mineral leasing, because I think the wildlife and scenic and watershed and other values of these areas, in my mind, are more important than their economic possibilities.

H32-1

The Rio Grande wild and scenic river corridor is, again, a very beautiful spot. I have hiked it in the New Mexico portion. I would like to see you expand it beyond its current length another 12 miles. I think the entire length has strong recreational and wildlife values for rafters and hiking, and which, again, we all know are becoming increasingly scarce and increasingly in demand. I think those are values which are ongoing and open-ended as opposed to foreclosing future uses as development and keeping development as a option would be.

H32-2

And as for grazing, I understand you have a possibility of increasing grazing allotments on your areas. And, once again, I would recommend,

as I am sure you can guess, that rather than
increasing cattle grazing allotments, you allocate
additional grazing opportunities to wildlife, which
H32-3 if we look on a global scale, also a more microcosmic
scale in this region, wildlife and plants and those
kinds of things are the things which are in danger,
which are threatened. Those would be the values that
I would urge you to protect.

One other point, again getting a
little bit global. I don't know how much time I
have. I know you are very pressed for time here.
This is a huge public gathering here. This is just
another kind of perspective to throw on what you are
dealing with in your decisions.

As we understand, from a global
perspective, that forests and open spaces and
wildlife habitats are disappearing at horrifying
rates. Again, we too, in the Rocky Mountain region,
our open space and natural areas become more
important, we in the Rockies, particularly to the
public lands managing agency, which has laws that are
guiding it in protective uses. This is very rare on
the planet today to have open spaces, herds of elk
and deer that we can protect, habitat we can protect.
We know that there are very few other countries in

MS. MURRAY: My name is Margaret
Murray. I live at 2716 West 25th Avenue in Denver.
I just started working for Sierra Club. I work for
them. I am speaking as a private citizen. Not
knowing -- just basically out of preference for
wanting to preserve the public lands and not
necessarily knowing a lot of detail about this plan,
other than what I have been told recently, I would
H33-1 just like to make a few points about the plan. One
would be to add Elephant Rock to it. Another would
H33-2 be that, prohibit all mineral leasing, mineral entry
and off-road vehicles on the land. Third would be to
H33-3 limit the amount of grazing done by livestock, not to
increase it and to rather leave it open for wildlife.
H33-4 Also not to allow the construction of a Taos power
line to run through the Rio Grande corridor. And
H33-5 finally, to extend the, what is designated for Rio
Grande River to about 12.3 miles north of what has
been recommended. Thank you. Thank you.

HEARING OFFICER CUSHING: Anybody else
like to make any statements?

MR. KOEPSEL: I just wanted to add one
little section to my statement. Is that okay?

Kirk Koepsel. I wanted to -- one
aspect of the comments that I had neglected to talk

about was the management of areas of the critical
environmental concern. And I know you've gotten
various comments today asking that off-road vehicle
use be prohibited in these areas. Mineral leasing
should be protected as well as mineral entry.

I think that when Congress -- what
Congress envisioned as areas of critical
environmental concern was very vague and allowed the
agency to develop management plans for these areas.
What the agency has typically done is taken areas
with very sensitive resources, with sensitive plants
species, rare sensitive plant species, outstanding
wildlife habitat, with outstanding geological or
historical characteristics that really warrant
protection. I think that what -- there are a few
ACECs that have been recommended in other resource
areas that have more of a multiple-use concept, but I
think out of the areas that have been recommended in
San Luis, it's very important to preserve the
characteristics out there. I think all of them have
very unique and special characteristics that deserve
H34-1 the protection of no off-road vehicles there.

Some of them do have existing roads
like Triple Mountain where I think that use can
continue on those existing roads, but that use --

when I say off road, I don't mean off-highway use, I
mean off-road use in those areas.

I think with mineral leasing, that
H34-2 mineral leasing just is not compatible with resources
out there. I don't think anyone wants to see any of
these ACECs develop into an oil an gas field. That's
what we're talking about with mineral leasing. If
you lease the area you have -- there's a potential of
that happening in the area, although we hear, well,
there's really no oil and gas resources in these
areas. That's not for, I don't think, either the
agency or the public to determine. That's for an oil
and gas company that -- or an exploration company to
do, to determine if there's oil and gas resources out
there; that the BLM's job in this case is to protect
the resources out there, and if an oil and gas field
is not compatible with resources out there, it
shouldn't be allowed.

I think the same is true with mineral
entry. That mine is just not compatible with the
H34-3 resource that ACEC is protecting. I think it's very
important that mineral entry is prohibited in these
areas.

Also all three of those are very key,
I think, to protecting the unique resources that are

found in each of these areas.

And as far as the 60 40 split, I wanted to address that concern, too. I think it's very commendable that 60 percent of the increase in AUMs is going to wildlife. I think it should be higher though. I think that basically ranching right now is at a very -- it's at a -- it's kind of reached a level where I don't think there's very many new people going into ranching, things of that nature. It remains at a static level. I think that this San Luis Valley has some real potential for improving the wildlife populations in that area and developing more of a tourist economy, basically increasing wildlife. I would like to see a much greater majority of those increases in forage go to wildlife rather than to livestock. I think it will have a bigger economic impact on the valley. Also create an atmosphere where people can see a lot more wildlife in that area.

MR. ZACHMAN: One question on -- I am still not quite sure on what you meant by off-highway vehicle use in ACECs. Are you saying that basically it would be in a limited category in ACECs? In other words, use-limited to designated roads and trails or no use at all?

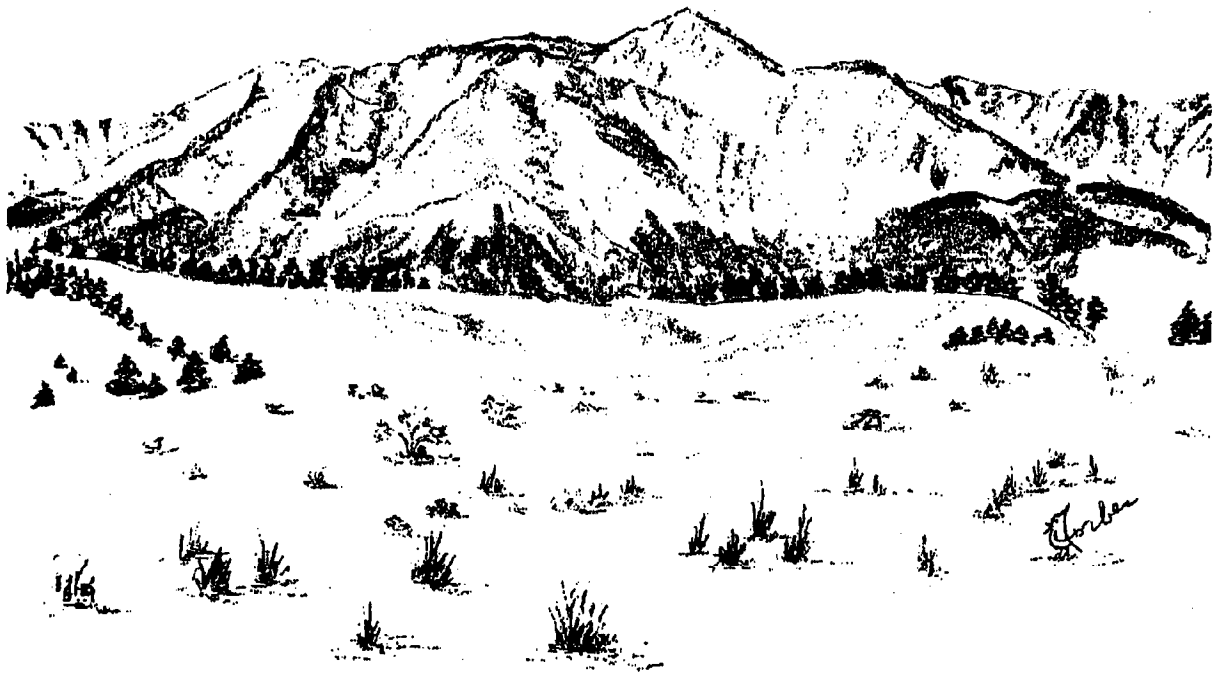
H34-5

signing system. There are a couple of areas we feel vehicle use is not compatible in. A couple -- one is the Sand Castle ACEC. With the very important cultural resource in that area, we cannot envision that the area would have been compatible with off-road vehicle use. Triple Mountain is an example where I think a white arrow signing might be appropriate; okay?

MR. TALIAFERRO: The question I had, you brought up on on mineral entry, one of the things you mention. Of the 136,000 in ACEC, we're recommending 126,000 in the preferred alternative. Of that 126,000, there are an array of, in terms of oil and gas leasing, there's NSO, as well as some smaller areas are closed to mineral entry as well as leases. The majority of them, sensitive areas within those, are covered in the preferred, anyway, as an NSO, no surface occupancy. Are you saying that NSO would not protect that from oil and gas leasing?

MR. KOEPSEL: We have a basic philosophical difference with BLM on NSO. What we prefer to see the agency doing -- I just had a discussion with the national director on this last week. On this we think that BLM should begin by determining which lands are suitable for oil and gas.

APPENDIX C
FLUID MINERALS MANAGEMENT



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APPENDIX C

FLUID MINERALS MANAGEMENT

BLM AUTHORITY AND RESPONSIBILITIES FOR OIL AND GAS OPERATIONS

The BLM has responsibility for environmental protection, public health, and safety related to oil and gas operations on BLM-administered lands. There are three pieces of legislation that give primary direction to BLM for these operations: the *Mineral Leasing Act* of 1920, as amended, the *National Environmental Policy Act* of 1969 (NEPA), and the *Federal Land Policy Management Act* of 1976 (FLPMA). There is other legislation that affects various aspects of development. Most notably, these include laws to protect cultural resources and endangered species.

The law that directs BLM to make public land available for development of oil and gas resources is the *Mineral Leasing Act.* This legislation directs BLM to make all public land available for oil and gas development with the exception of specific lands, such as national parks, which are listed in the Act or its amendments.

The *National Environmental Policy Act* of 1969 (NEPA) directs all Federal agencies to analyze and disclose to the public the impacts of major Federal actions. Oil and gas leasing is a major Federal action by definition. The BLM prepares an environmental impact statement (EIS) to fulfill the mandate of NEPA (hence, this document).

The *Federal Land Policy and Management Act* of 1976 (FLPMA) instructs BLM to prepare and disclose to the public its plans for the lands under its jurisdiction. Since the *Mineral Leasing Act* requires availability of public land for leasing and since the leasing could lead to development that may have impacts on the environment, all three pieces of legislation are tied together in a workable process to accomplish the Congressional intent. The primary focus of the process for oil and gas development is the BLM resource management plan/environmental impact statement (RMP/EIS). Within the RMP, plans are disclosed for development/conservation of oil and gas (as well as all other resources and values). The RMP also serves to analyze and disclose the environmental impacts of the projected development.

Once decisions have been reached through the planning process as to what lands are available for leasing and under what conditions, they are offered for sale at auction. Those people interested in purchasing oil and gas leases may nominate a parcel, or BLM may offer parcels of its choosing. In either case, the proposed parcel must conform to the RMP decisions and be offered for sale at a public auction. Those parcels that do not sell at the auction are available for noncompetitive sale for a 2-year period thereafter.

Management decisions are incorporated into the lease document as stipulations and notices before it is issued. Public notice of the sale (which includes the list of parcels offered, their location, and the stipulations to be attached) is given 45 days prior to the sale. Significant change to the stipulations made after the lease is issued is also posted for public notice for 30 days prior to making the change.

The purchaser of a lease at the auction must bid at least 2 dollars per acre. The bonus bid must be paid at the sale, and the rent is due at the beginning of each new year as long as the lease is held and is not producing. Leases purchased at auction may be held for 5 years without production. Leases purchased noncompetitively after the auction may be held in nonproducing status for 10 years. If the lessee establishes production, a royalty of 12 1/2 percent must be paid to the government. Half of that money is returned to the state and county of origin for their use. The other half goes into the Federal treasury earmarked for reclamation projects, the National Forest System, National Park Service, etc.

Separate from leasing actions, geophysical explorationists may explore for oil and gas on public land. Geophysical exploration on public land requires approval of the methods employed and mitigation of impacts. The BLM resource area office must receive a copy of the Notice of Intent to perform geophysical operations. The exploration plan is analyzed for conformance with the resource area resource management plan/EIS and mitigative measures and reclamation requirements are attached to the approval. BLM specialists examine the Notice of Intent (the plan of operations) and the site, or "line," to be explored, as well as the RMP in determining appropriate mitigative measures and reclamation requirements.

The majority of geophysical exploration operations conducted on public lands are done by exploration companies. Some are associated with petroleum producers, many are not. Geophysical exploration operations may also be conducted on a lease held by the lessee with the same requirements for mitigation of impacts and reclamation. (See further discussion of oil and gas exploration below.)

A well must be drilled in order to produce oil and/or gas from the lease. Before drilling a well, the lessee, or an operator for the lessee, must file an Application for Permit to Drill (APD). The operator must file the application with

the district or resource area office in which the action will take place. The application must include a plan for the drilling of the well and a plan for the protection of the surface and environment. The drilling plan contains information as to the depth of the well, how it will be constructed, how groundwater and other mineral resources will be protected, and how blow-outs and other emergencies will be prevented or addressed. The surface use plan covers such concerns as the location and amount of surface disturbance and how that disturbance will be reduced or eliminated. It covers mitigation of impacts to wildlife, cultural resources, vegetation, soil, surface water, and other land uses and values. Each resource/value is evaluated in light of the RMP decisions. The operator is responsible for incorporating all RMP decisions in the proposed APD. If the APD does not have the appropriate information and mitigation incorporated, the application may be modified or rejected. In most APDs in Colorado, the few RMP decisions not incorporated by the operator are attached to the approved application by the BLM as Conditions of Approval (COAs).

At a minimum, each APD is reviewed by a BLM geologist, petroleum engineer, and surface reclamation specialist and by the Authorizing Officer (area or district manager). The geologist evaluates the need for groundwater and other mineral resource protection and the structural competency of casing point formations. The petroleum engineer evaluates the drilling plan, the well construction, and the safety of the operation. The surface reclamation specialist evaluates the surface plan, checks the proposal against the RMP and other guidance, conducts the onsite inspection, analyzes impacts, proposes mitigation, and writes the environmental assessment (EA). The surface reclamation specialist also calls on other expertise as needed in the analysis of impacts and recommendation of mitigation and reclamation requirements. For example, the BLM archaeologist would recommend any needed mitigation for impacts to cultural resources.

APD information is posted in the local authorizing office for a 30-day public notice period. The APD may not be approved until the comment period has expired. Each lease where an APD is proposed is checked to determine if a bond has been posted to cover abandonment of the well should the lessee/operator default on their obligations under the lease. Each application is evaluated as described above, and subjected to a field inspection of all proposed disturbed areas. Appropriate, site-specific mitigation is then attached to the APD as COAs. A cultural resource inventory is conducted for each APD, and a report sent to the district/resource area archaeologist for evaluation. In designated areas, endangered species or other inventories may be conducted. The proposal is subjected to a *National Environmental Policy Act* (NEPA) review (an EA) that checks for conformance with the RMP and determines whether or not there is a need for additional review (i. e., an expanded EA or environmental impact statement). EAs are prepared for all APDs on Federal lands in Colorado. When all impacts are analyzed, all necessary mitigation incorporated, and the public notice period expired, the APD may be approved.

In cases where the proposed well is obviously part of a larger field development, and such development has not already been scrutinized by a NEPA document other than the RMP, a "field development" EA is prepared. This EA looks at conformance of the specific field development with the general development analyzed in the RMP. As with the APD EA, an EIS is prepared if the projected field development does not conform with the analysis of field development in the RMP.

Over the life of a field, other operations, such as construction of power lines, pipelines, use of secondary and tertiary recovery methods, and other production facilities may become necessary. Each new surface disturbance is subjected to the same RMP test. Each is analyzed to determine impacts and mitigation. New ideas and technology are incorporated into new mitigative measures as they become available and when they do not impact the lease rights granted. New ideas and technology may also require amendment or maintenance of the RMP/EIS prior to use as mitigation.

As the well(s) plays out and comes to the end of its usefulness, it is abandoned and the disturbed area reclaimed. The operator must submit an abandonment notice for approval. The notice is evaluated by a geologist and a petroleum engineer to determine that the well will be plugged to protect usable water zones, other mineral resources, and the surface from contamination by any oil or gas that might leak up from the depleted reservoir or other fluids and gases up hole or on the surface that could migrate through the old well bore (and casing if left in place) to harm other resources. The surface reclamation specialist checks the final reclamation proposal to ensure it is in accordance with the original APD requirements, and, in some cases, incorporates the latest methods of reclamation. Reclamation is required to restore the well site, road, and other disturbances to as an original (or better) condition as possible. The surface reclamation specialist also inspects the location once or twice at approximately 1-year intervals to monitor the progress of reclamation. If the reclamation does not meet the requirement set out in the APD, the operator will re-do those portions necessary to complete the goals for the reclaimed area. The well will continue to be monitored until the surface reclamation specialist is satisfied that the reclamation has succeeded and the location is stable.

The BLM authority to require reclamation has only existed since the passage of the *Federal Land Policy Management Act* of 1976. Wells abandoned prior to that time were reclaimed haphazardly at best and primarily as gratis by the companies involved. These older unreclaimed sites are reclaimed by the BLM as the need arises and money is

available. In the majority of cases "natural reclamation" has stabilized and revegetated the site. An attempt to further reclaim the location at this time would do more harm than good. BLM only reclaims such locations when a serious erosional or other problem has developed. Some unreclaimed locations are reclaimed by a new lessee as part of a new lease agreement.

Field operations are inspected by BLM to ensure accountability of royalties and compliance with the lease and permit safety and environmental requirements. Field inspections to wells are made at the predrill, construction, drilling, and production phases. Inspections are also made at the plugging of the well, during reclamation, and periodically thereafter as necessary to ensure the reclamation is effective. Petroleum engineering technicians and surface reclamation specialists have primary responsibility for field inspections, however, other specialists may inspect wells as needed. Typically these specialists include petroleum engineers, geologists, archaeologists, wildlife biologists, range conservationists, and others.

The primary function of the petroleum engineering technician is to account for accurate and complete measurement of production. They perform inspections to check the installation and calibration of measuring devices such as tanks for oil and flow meters for gas. Petroleum engineering technicians also inspect for environmental, public health, and safety concerns.

Operators are required to submit monthly production reports, which go to the Minerals Management Service (MMS) and are available to the BLM inspectors electronically. The BLM verifies the report in the field and the MMS verifies the royalty payment. The two agencies work together to ensure that all production is accounted for and royalty is paid.

Operations within the jurisdiction of other Federal or state and local agencies may also be field inspected by those agencies. The BLM has several agreements with other agencies that specify conditions where the BLM will notify the agency of violations within that agency's jurisdiction and in turn the agency will notify the BLM of violations within its jurisdiction.

Oil and Gas Exploration and Development

Oil and gas exploration and development activities progress through five phases, which are, in part, sequential and may overlap in time: preliminary exploration, exploratory drilling, development, production, and abandonment. Leases are obtained before the second phase (exploratory drilling).

Preliminary Exploration

Petroleum exploration occurs in unexplored portions of areas where petroleum is known or thought to occur in commercial quantities. An area where petroleum is thought to occur in commercial quantities is known as a frontier or rank wildcat area. With declining known oil and gas supplies, it has become profitable to explore for oil and gas in less promising geological provinces and in areas where the climate, terrain, depth of deposits, and other obstacles have discouraged previous efforts. Increasingly sophisticated exploration techniques, improved oil and gas drilling, and transportation technologies have also enhanced prospects for locating, extracting, and marketing petroleum resources.

Geological Exploration

Where the bedrock geology of an area is well exposed, it is often possible to predict where oil might gather. The potential traps (anticlines, faults, or formations with varying porosity) can sometimes be located with the aid of published geologic maps, aerial photos, and landsat imagery. Occasionally, additional data will be gathered by aircraft. Low altitude reconnaissance flights, frequently at elevations of 100 to 500 feet, help identify rock outcrops that can be studied later on the ground. Next, one or more geologists may examine and sample the rock outcrops in the area and map the surface geology. Geological exploration can be performed with little surface damage; four-wheel drive pickups, motorcycles, or all terrain vehicles can be used to cover the area.

Geophysical Exploration

Subsurface geology is not always accurately indicated by surface outcroppings. In such cases, geophysical prospecting methods are used to define subsurface structure. Three geophysical survey techniques can be used to define subsurface characteristics through measurements of the gravitational field, the magnetic field, and seismic reflections.

Gravity and magnetic surveys indirectly measure course subsurface structure. The fieldwork involves small portable units, which are easily transported via light off-highway vehicles, such as four-wheel drive pickups and jeeps, or aircraft. Off-highway vehicle traffic is common in these two types of surveys. Sometimes, small holes (approximately 1 inch by 2 inches by 2 inches) are hand dug for instrument placement at the survey measure points. These two surveys can make measurements along defined lines, but it is more common to have a grid of discrete measurement stations.

Seismic reflection surveys are the most common of the geophysical methods and produce the most detailed subsurface information. The seismic method detects subsurface geologic structural information by producing a source wave

at or near the surface that bounces off subsurface layers. The "echoes" or seismic reflections are recorded as a function of time. The deeper the subsurface reflecting layer, the later in time it is detected. The weak seismic reflections are detected at the surface by arrays (groups) of seismometers or geophones that are very similar to microphones. The geophone electrical signals are sent by a connecting cable to the recorder unit where the signals are amplified and then recorded on a multi-track magnetic tape.

The tape is later sent to a computing center where it is rearranged and computer enhanced to present the subsurface reflections in a graphic picture called a Seismic Section. The seismic reflections are very weak requiring very sensitive geophones. While the geophones can "hear" the desired reflections, they also detect: cars and trucks, people and animals moving about, water wells pumping, airplanes (at tens of thousands of feet in the air), trains (many miles away), the wind blowing, and trees and shrubs moving in the wind.

Any of these other activities can produce a "noise" at the geophone, which often is stronger than the desired seismic reflections.

The seismic reflection method needs the seismic source and geophone arrays along a straight line. Sometimes it is possible to work along existing roads if the roads are straight. Where practical, existing roads are used to facilitate access to the seismic operations. The geophone arrays are normally straight along the line length. In difficult seismic data areas, however, they may have considerable width.

To understand the subsurface structures in three dimensions, it is necessary to have seismic lines recorded in a "cross" or line gridded pattern. The grid spacing between lines can be from a fraction of a mile apart to many miles apart depending on the exploration purpose. The exploration purpose will also determine what latitude, if any, there is in moving these lines.

The work of a seismic crew begins with the permit agent obtaining permits from private landowners and government agencies.

The survey crew next places pin flags and other markers at uniform intervals along the seismic line and carefully measures the markers in relation to precisely known geographic locations. For a shot hole explosive seismic source, drilling rigs will be working on the seismic line. When the complete seismic line is ready, the geophone crew arrives and places the geophones in arrays in precise locations to the flagging and lay connecting cables between the geophone arrays and the recorder unit. After the seismic reflection data is recorded, the geophone crew picks up all the geophones and connecting cables and cleans up the seismic line. Most of these individual steps involve one or more equipment trucks to travel the seismic line if the terrain is driveable.

The seismic reflection method is usually referred to by the type of seismic source. The most common seismic sources are vibrator, shot hole explosive, and surface explosive.

The geophysicist, in determining the seismic exploration program parameters, will pick the most appropriate seismic source based on the depth of exploration interest and the degree of detail needed to define the subsurface structure.
Vibrator Source

The vibrator method uses a 4x4 or 4x6 wheel drive truck or buggy mounted hydraulic vibrator source. Their primary physical feature is a pad (about 4 feet square) that is slowly lowered from the center of the truck or buggy to make contact with the ground. Connected to the pad is the reaction mass. The reaction mass is moved a few inches up and down hydraulically in a carefully controlled manner to send a seismic source wave into the ground.

The vibrator is a weak seismic source and requires two to eight vibrators working together to create detectable reflections. Since it is a weak source, it has been used successfully to gather seismic reflection information in difficult high population areas such as Los Angeles and Paris.

To be able to use the vibrator source method, it is required that the seismic line goes along a straight road, or if cross country, over gentle, rolling driveable terrain.

Conventional Drilled Shot Hole Source

The shot hole explosive source requires the drilling of a hole to a predetermined depth, placing explosives at the bottom of the hole and back filling the hole with cuttings if the hole is air filled, or bentonite chips if the hole is naturally water filled.

Shot hole drilling depths will range normally from 25 to 200 feet. The explosive charge size can range from 5 to 50 pounds. The hole diameter is typically 2 to 6 inches. The drill rigs are most often truck or buggy mounted. Cuttings from drilling the hole are normally scattered by hand near the shot hole or put back in the shot hole after explosive charge placement. Proper preplugging of the shot hole with tamped cuttings or bentonite chips prevent the view commonly shown in the movies of holes "blowing out. " There are some special source testing situations that need the detonation of charges in open holes. A shot hole that "blows out" causes a very poor seismic source wave that is very detrimental to the seismic reflection method. Detonation of a properly preplugged shot hole will create the best seismic source wave and cause no surface disturbance.

Portable Drilled Shot Hole Source

Special limited depth drill rigs can be moved in pieces by a helicopter. Helicopter portable drills are used where access limitations or topography restraints prevent use of conventional truck or buggy mounted drill rigs. This is a very expensive option, which also places significant limits on the depth of drilling, and consequently, the size of the explosive charge. These limits can severely restrict the reflection methods ability to define subsurface structures.

Surface Explosive Source

The surface explosive source method involves placing puds (pouches) of explosives on a number of stakes driven into the ground. This is also called the Poulter method, named after its developer.

The explosive puds range in size from 1 to 5 pounds. The stakes are typically 4 to 8 feet in height. The number of stakes used in the source array can range from a few to the more common 10. Occasionally the explosives are placed on the ground or snow, but this is a less effective source wave technique. Use of tall (6-foot) stakes or placing the explosives on the surface of deep snow results in little visible surface disturbance, in contrast to the noise level of the detonations. The surface explosive method is very mobile. Generally 4x4 vehicles are used for transportation, although it can be supported with animal pack teams or helicopters.

Mini-hole Explosive Source

The mini-hole explosive source can be used in favorable conditions. A very small portable unit is use to drill a number (a source array) of small diameter shallow holes. The holes are usually 2 to 3 inches in diameter, drilled to depths of 5 to 15 feet and each hole loaded with a small, 1 pound or less, explosive charge. These holes are detonated simultaneously to produce a seismic source wave. This method, however, is usually limited to defining shallow subsurface structures, and therefore, cannot often be substituted for the significantly more effective deep shot holes.

A given area may be explored several times by the same or different companies over a period of time. Multiple exploration is undertaken for a variety of reasons--first attempts may have been unsuccessful, the depth of exploration interest may have changed, other competitive companies want their own information, or improved techniques and/or equipment are used.

All the work required to obtain exploration seismic data does not guarantee that the data will indicate any necessary subsurface structures--let alone a subsurface structure containing hydrocarbons. For the explorationist, the unfortunate reality is that obtaining seismic data most often leads to the decision that an area does not have adequate subsurface structures or structures containing economic hydrocarbons and therefore no drilling will follow.

TYPES OF OIL AND GAS DRILLING AND PRODUCTION

Oil and gas wells are drilled primarily with rotary drilling rigs. The rigs use mud or compressed air as a medium to cool the drilling tools, carry cuttings to the surface, and, in the case of mud, to stabilize the drilled hole. In the early days of drilling, the "cable tool" rig was the predominant method of drilling. Cable tools were largely replaced by rotary rigs in the 1950s. Some of the oldest wells still producing in Colorado were drilled with cable tool rigs.

The method of drilling is generally the same regardless of the target production. The depth of the target usually has more to do with the method of drilling than the type of production. In general, deeper wells require larger rigs, which in turn require larger drill pads. Because oil is more valuable than gas, gas wells tend to be shallower in depth. The reason is that deeper wells cost more and the lower profitability of gas production means they do not bear the higher cost of deeper wells. The size of the anticipated production also has a bearing on the expense a given production will bear. For example, a very large gas producing reservoir may better bear the cost of deeper drilling than a shallow, low producing oil reservoir. But, all else being the same, deeper reservoirs cost more to develop than shallow ones.

The biggest differences among the various types of oil and gas wells occur in the production phase of operations. The same basic rotary drilling methods are used for drilling all types of oil and gas wells.

Oil and Gas Co-Production

Reservoirs that produce both oil and natural gas require the siting of facilities for the production, clean-up, and storage and/or transportation of the products on location (i. e., the well pad). If the well produces naturally, that is the gas and oil flow to the surface under natural pressures, only a series of pipes and valves at the well "head" are required to regulate the flow of product to the surface. If there is no, or insufficient, natural pressure, a pump is installed to lift the product to the surface. Once the oil and gas comes to the surface, it travels through pipes to separation equipment where water and gases such as carbon dioxide are removed, and the gas and oil are separated. The water and oil are piped to respective storage facilities and the gas put into a transmission pipeline. In a few cases, separation/clean-up and/or storage facilities are located off the well pad for common use by more than one well. But, in the great majority of the wells in the study area, all facilities are located on the same pad on which the well was drilled.

Gas is transported to market through a network of gathering pipelines from each well to a transmission line. The gathering system usually consists of pipe of 2 to-4 inches in diameter, which is laid on the ground or buried several feet below the surface. BLM most often requires that lines be laid near the access road or buried under it to save additional surface disturbance. Measurement of gas is usually through a differential pressure recorder on the well pad.

Oil is produced into tanks either on the well pad or a common tank near the well. The oil is measured for sale from these tanks and transported to distribution points by special truck. In the case of some highly productive fields, oil carrying pipelines may be laid to a distribution point or refinery. In these cases, there is a network of pipelines to each well similar to that for the gas gathering system. The oil gathering lines are usually 4 to 6 inches in diameter, and measurement is either through a sales tank or a sales meter attached to the line.

In some areas, hydrogen sulfide (also known as H2S or sour gas) may be found with the hydrocarbon production. In these cases, special stainless steel pipe is used to contain the production until the hydrogen-sulfide can be separated from the hydrocarbons. The hydrogen sulfide is disposed of by incineration or neutralized by sulfur extraction.

Oil Production

Typically, oil is produced in association with water and gas; however, in some cases oil is produced with almost no water nor associated gas. The facilities to produce such oil are the same as those described above without the equipment for gas cleanup and measurement.

Dry Gas Production

Dry gas is a term applied to any natural gas produced without oil. It usually has some water associated and may have a small amount of light liquid hydrocarbons, called "drip" or condensate. Dry gas wells typically have only a "christmas tree" or valve/gauge assembly, showing above ground. Production facilities may include a pit or tank for the collection of separated produced water and a small tank for the storage of the liquid hydrocarbons. As with oil and gas production, there is a gathering pipeline and sales meter for gas distribution.

Carbon Dioxide Production

Carbon dioxide is produced in a manner similar to dry gas. But, carbon dioxide, in combination with water, may form carbonic acid, which is very corrosive. The produced gas, therefore, must be "cleaned" (impurities removed) as soon as possible after it reaches the surface. For that reason, stainless steel piping is used from well head to separator, and separators are placed as close as possible to the well head. Usually a single large separator is located to service

several wells. The use of some stainless steel pipe and common separators are the two most distinguishing surface features of carbon dioxide production.

Exploratory Drilling

Drilling does not begin until a lease has been acquired by the operator. When preliminary investigations are favorable and warrant further exploration, exploratory drilling may be justified. Stratigraphic tests and wildcat tests are the two types of exploratory drill holes.

"Strat" tests involve drilling relatively shallow holes to supplement seismic data. The holes are usually from 100 to several thousand feet deep, and are drilled primarily by rotary drill rigs. As the rock is drilled, the resulting rock chips are brought to the surface by a high-pressure airflow or circulating drilling mud. Samples of these chips are collected, bagged, and identified as to depth of origin. They are then studied by a geologist to determine such data as rock type, age, and formation.

Truck-mounted drilling equipment for strat tests is fairly mobile; therefore, roads and trails to test sites on level solid ground are temporary and involve minimal construction. In hilly or mountainous areas, more road building is necessary.

Generally, access roads are bladed 12 to 14 feet wide and are not crowned nor ditched. Some roads may simply be surface scraped; i. e. , vegetation is clipped off next to the soil surface. Other roads may require cuts in excess of 20 feet and fills exceeding 10 feet. Strat tests requiring a large amount of construction (i. e. , several acres of cut and fill described previously) are unusual since construction costs may outweigh the information gained.

A space of about one-half acre or less is leveled and cleared of vegetation for the average drill site. If high pressure air is used to remove rock chips or rock cuttings, rock dust may be emitted into the air when samples are not being collected. If mud is used as a drilling fluid, mud pits may be dug; more commonly, portable mud tanks are used. Usually 1 to 3 days are required to drill the test holes, depending on depth to and hardness of the bedrock. In areas with shallow, high-pressure, water bearing zones, casing may be required to keep water out of the hole.

After the surface and subsurface geological studies, the seismic, and other geophysical surveys, comes the evaluation of the prospect. Only by drilling a wildcat well (a well drilled in unproved territory) will the oil company know if the rocks in the prospect they have identified contain oil or gas.

Nationally, about 1 in 16 wildcat wells produces significant amounts of oil or gas. Locally, success ratios may be as high as one in 10. The deeper wells may require several months or more to complete; shallower wells up to a few thousand feet deep may be completed in as little as a few weeks. As a general rule, the deeper the test, the larger the drilling rig and facilities required.

Prior to approval for drilling, onsite inspections are conducted with the proposed drill pad and access road staked out, to assess potential impacts and attach appropriate mitigative conditions to the permit to drill. A drill "pad" (well site) from 1 to 4 acres in size is then cleared of all vegetation, and leveled for the drill rig, mud pumps, mud (or reserve) pit, generators, pipe rack, and tool house. Topsoil and native vegetation are usually removed and stockpiled for use in the reclamation process. The mud pit may be lined with plastic or bentonite to prevent fluid loss or prevent contamination of water resources. Other facilities such as storage tanks for water and fuel are located on the pad or are positioned nearby on a separate cleared area. If the well site is not large enough for the equipment required to rig-up (prepare the drilling rig for operation), a separate staging area may be constructed. Staging areas are usually no larger than 200 by 200 feet and may simply be a wide flat spot along the access road on which vehicles and equipment are parked.

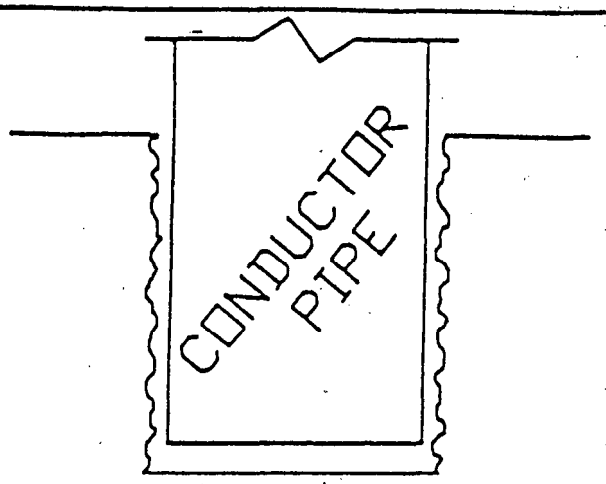
Five thousand to 15,000 gallons of water a day may be needed for mixing drilling mud, cleaning equipment, cooling engines, etc, for each well. A surface pipeline may be laid to a stream or a water well, or the water may be trucked to the site from ponds or streams in the area.

The rigs are very large and may be moved in pieces. In some instances, rigs can be moved short distances on level terrain with little or no dismantling of equipment, which will shorten the tearing-down and rigging-up time. Moving a dismantled rig involves use of heavy trucking equipment for transportation, and crews to erect the rig. Gross weight of vehicles may run in excess of 80,000 pounds.

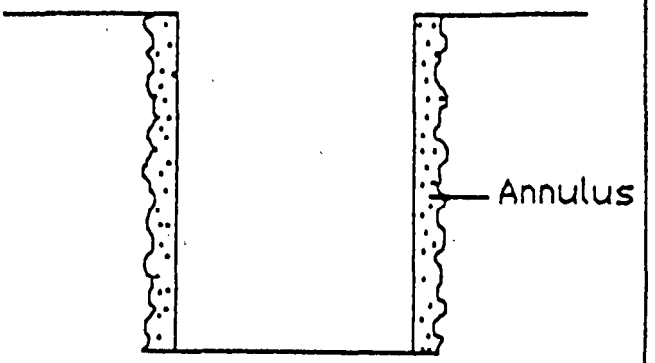
In order to move a drill rig and well service equipment from one site to another, and to allow access to each site, temporary roads may be built. These roads are generally 16 to 18 feet wide (driving surface) and may be as short as 200 feet or as long as 10 miles or more. Bulldozers, graders, and other types of heavy equipment are used to construct and maintain temporary wildcat roads.

The start of a well is called "spudding in." A short piece of tubing called conductor pipe is forced into the ground (sometimes with a piledriver), and cemented in place. This keeps surface sand and dirt from sloughing into the well hole. Next, the regular drill bit and drill string (the column of drill pipe) take over. These pass vertically through a heavy steel turntable (the rotary table) on the derrick floor and the conductor pipe. The rotary table is geared to one or more engines, and rotates the drill string and bit. As the bit bores deeper into the earth, the drill string is lengthened by adding more pipe to the upper end. (See Figure A-1).

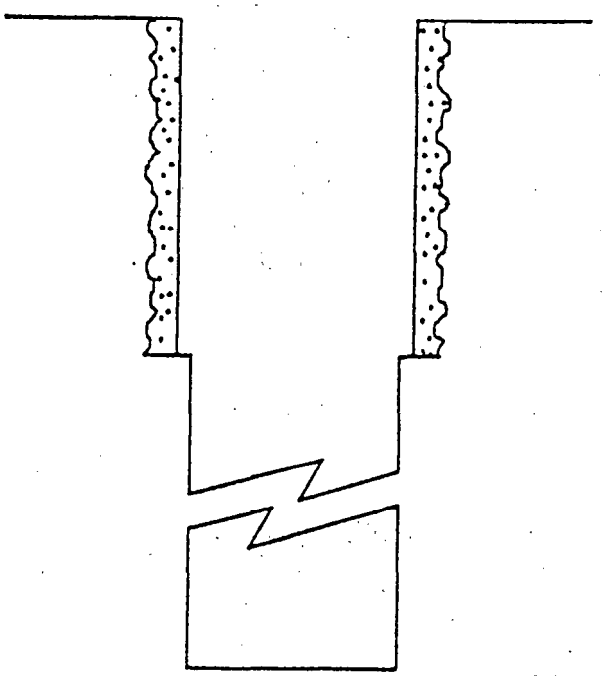
FIGURE A-1



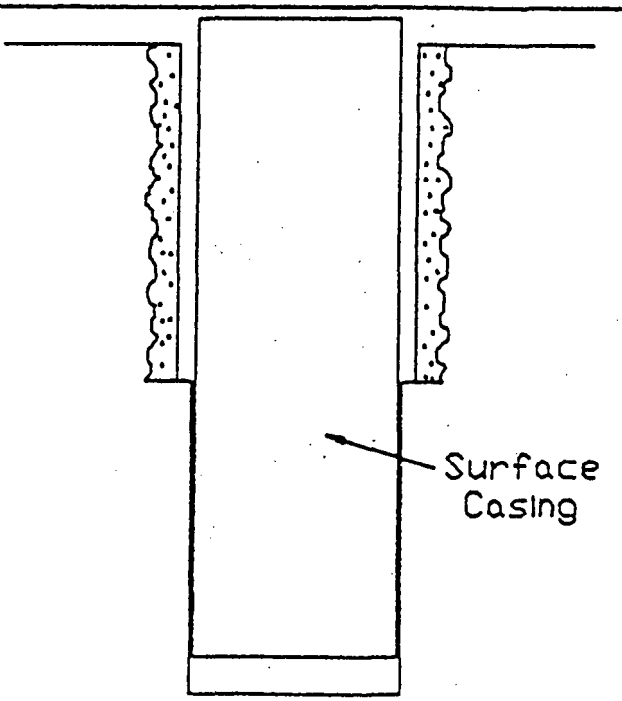
1. Well is initially started with an oversized bit and drilled up to 50 feet deep. A large-diameter pipe known as a conductor pipe is lowered into the hole to keep surface soil from sluffing into the hole while the surface casing hole is being drilled out.



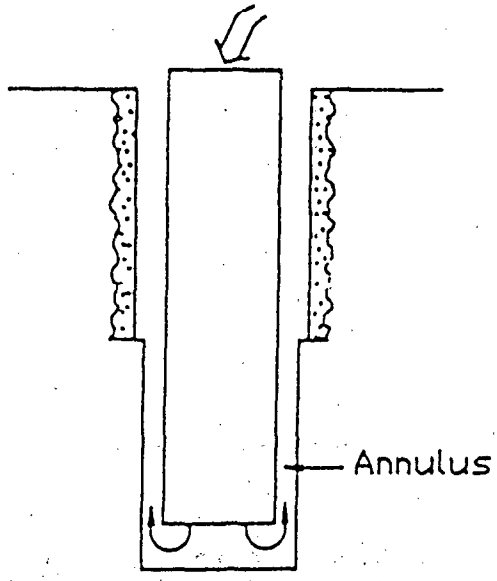
2. Cement is placed in the annulus (the space between the well hole and the pipe or between a smaller and larger pipe).



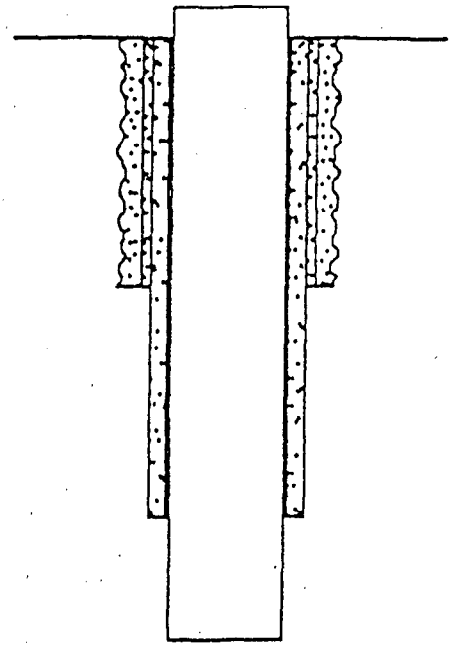
3. Surface casing hole is drilled out from inside the conductor pipe to a predetermined depth typically about 10% of the total depth.



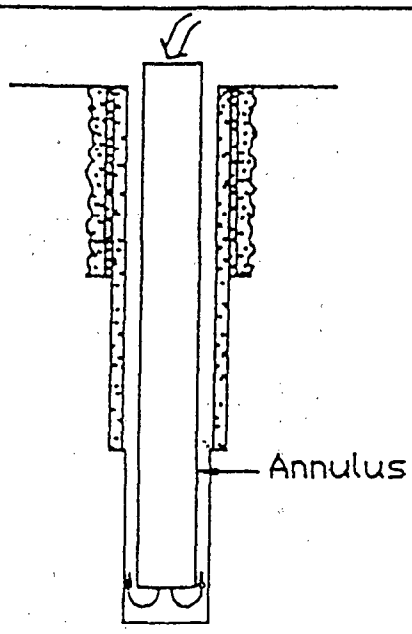
4. Surface casing is lowered into the hole.



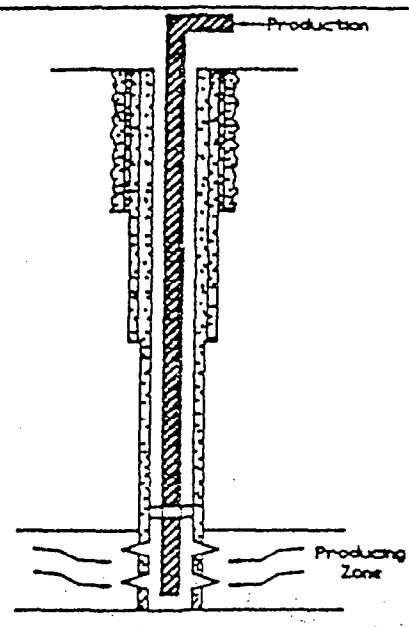
5. Cement is pumped down the surface casing and forced up the outside through the annulus. The cement is used to hold the surface casing in place. It protects shallow fresh water and other mineral zones.



6. The well is deepened using a bit smaller than the surface casing. The well is now drilled to its' final depth. In deep wells, intermediate casing is set before drilling to the final depth.



7. The intermediate casing, or production casing is lowered into the hole. Cement is pumped down the casing and up the outside through the annulus to seal the casing in place. This cement will also isolate and protect all hydrocarbon-bearing zones, fresh water zones, and other zones of interest.



8. Once the production casing is in place, perforations are made through the casing and cement into the producing formation. Techniques are then used to increase the flow of oil and gas into the well. Production tubing is hung down the well to the producing zone. Oil and gas flow into the well and either flow or are pumped up the production tubing to the surface.

Once the hole reaches a depth of several hundred feet, another string of pipe (the surface casing) is set inside the conductor pipe and cemented in place by pumping cement between the casing and hole wall. Surface casing acts as a safety device to protect freshwater zones (aquifers) from drilling fluid contamination. To prevent the well from "blowing out" in the event the drill bit hits a high pressure zone, "blowout preventers" (large metal rams) are installed around the surface casing just below the derrick floor. These rams will close around, crushing the drill string and sealing the well in the event of a blowout.

After setting the surface casing, drilling resumes using a smaller diameter bit. Depending on well conditions, additional strings of casings (intermediate casing) may be run (installed) before the well reaches the objective depth (total depth or "T. D. ").

During drilling, a mixture of water, clay, and chemical additives known as "mud" are continuously pumped down the drill pipe.

It exits through holes in the bit and returns to the surface outside the drill pipe. As the mud circulates, it cleans and cools the bit and carries the rock chips (cuttings) to the surface.

It also helps to seal off the sides of the hole (thus preventing cave-ins), and to control the pressure of any water, gas, or oil encountered by the drill bit.

The mud is the first line of defense against a possible blow-out since it is used to control pressure. It is for this reason that a pit full of "reserve" mud (the reserve pit) is maintained on location. The reserve mud is used in emergencies to restore the proper drilling environment when radical or unexpected changes in down-hole pressure are encountered.

The cuttings are separated from the mud and sampled so that geologists can note and analyze (log) the various strata through which the bit is passing. The rest of the cuttings pass into the reserve pit as waste. Some holes are drilled at least partially with compressed air which serves the same purpose as drilling mud of cooling and cleaning the bit and evacuating the cuttings from the hole.

During or at completion of drilling activity, the well is logged. Logging means measuring with geophysical instruments the physical characteristics of the rock formations and associated fluids through which the borehole passed. These instruments are lowered to the bottom of the well, and slowly raised to the surface while recording data. Other measuring procedures include the drill stem test, in which pressures are recorded and fluid samples taken from zones of interest. After studying the data from those logs and tests, the geologist and/or petroleum engineer decide if the well will produce petroleum.

If the well did not encounter oil and gas, it is plugged with cement and abandoned. The well pad and access road are recontoured and revegetated.

If the well will produce, casing is run to the producing zone and cemented in place. A proper cementing of the production casing string is required to provide coverage and prevent interzonal communication between oil and gas horizons and usable water zones. Initially, this is accomplished by placement of steel casing from the ground surface to a depth generally ranging between 200 and 1,000 feet. The actual length of this "surface casing" is dependent on factors such as depth of freshwater zones, anticipated formation pressures, and the length of the next smaller casing to be set. The annular space between the borehole and the exterior of the surface casing is required to be filled with cement. Cement is pumped down the casing and around the bottom until cement is returned to the surface outside of the casing. This ensures cement completely fills the annular space and precludes interzonal migration of formation fluids (i. e., groundwater). Following the placement of surface casing, the hole is drilled deeper and more casing is installed. Cement is placed in a similar fashion to the surface pipe, however, a quantity of cement sufficient to cover and isolate only those zones having hydrocarbons, usable water, or other mineral values.

If the determination is made that water monitoring wells are necessary in a given area, a separate borehole specifically designed as a monitoring well should be completed. Logical placement of a monitoring well would be in a protected location at the edge or just off the well pad (generally 100 to 200 feet from producing well bore). It should be noted also that monitoring wells and other relatively shallow boreholes have often had adverse impacts on the most critical groundwater source because of interzonal flows and introduction of bacteria and other contaminants into the system. The drill rig is usually replaced by a smaller rig that is used for the final phase of completing the well.

Development

If a wildcat well becomes a discovery well (a well that yields commercial quantities of oil or gas), development wells will be drilled to confirm the discovery, to establish the extent of the field, and to efficiently drain the reservoir. The procedures for drilling development wells are about the same as for wildcats, except there is usually less subsurface sampling, testing, and evaluation. If formation pressure can raise oil to the surface, the well will be completed as a flowing well. Several downhole acid or fracture treatments may be necessary to enhance the formation permeability to make the well flow.

When a well is "acidized," this refers to the process of placing acid in the well bore across the productive interval that causes the solution of some of the mineral materials (e. g., calicide, dolorite, etc.), which reside around the pore

space. Upon solution and removal of these minerals, porosity and permeability are enhanced. When a well is hydro-fractured, it simply means fluid, usually gelled water, is pumped down the well, through perforations in the casing and into the formation. Pumping pressures are increased to the point where the formation fractures or breaks, and the sand is added to the injection fluid to "prop-open" the crack once the pressure is released. The pressures required to fracture a given formation is generally quite predictable based on rock type and depth. For some formations, especially coals, abnormally high pressures are required to fracture them.

Pressures, volumes, and rates are all measured and monitored during the fracture process. These parameters provide information as to how the formation is behaving and if the fracture is propagating within the desired interval (i. e., staying in zone). This is especially true in coals, as sustained "high" injection pressure indicates the fracture is moving through the coal.

If pressures fall off, it indicates the fracture has extended beyond the coals and the operation can be halted. In addition to using the foregoing parameters to monitor fracture behavior, other methods for fracture geometry and extent available (e.g., tracer and tiltimeter surveys). Control is maintained throughout the fracture operation.

A free-flowing well is simply closed off with an assembly of valves, pipes, and fittings (called a christmas tree) to control the flow of oil and gas to other production facilities. A gas well may be flared for a short period to measure the amount of gas per day the well can produce, then shut in or connected to a gas pipeline.

If the well is not free-flowing, it will be necessary to use artificial lift (pump) methods. These are explained, along with well production equipment and procedures, in the following section on production. After a pump is installed, the well may be tested for days or months to see if it is economically justifiable to produce the well and to drill additional development wells. During this phase, more detailed seismic work may be run to assist in precisely locating the petroleum reservoir and to improve previous seismic work.

As with wildcat wells, field development well locations will be surveyed. A well spacing pattern must be established by the state, with approval of the BLM. (See Figure A-2).

Oil well spacing for production from Federal leases is usually a minimum of 40 acres. Most gas well spacing for production from Federal leases uses units of 160, 320, and 640 acres per well. Spacing for both oil and gas wells is based on the characteristics of the producing formation. If a field is producing from more than one formation, the surface location of the wells may be much closer than one per 40 acres. Once well spacing has been approved, development of the lease proceeds.

During the development stage, the road system of the area is greatly expanded. Once it is known which wells produce and their potential productive life, a permanent road system can be designed and built. Because it often takes several years to develop a field and determine field boundaries, the permanent road system is usually built in segments. Since the roads in an expanding and developing field are built in segments, many temporary roads (built initially for wildcats or development) end up as long-term (in excess of 15 years) main access or haul roads. The planning of temporary roads for wildcats and development wells is done with road conversion to long term in mind.

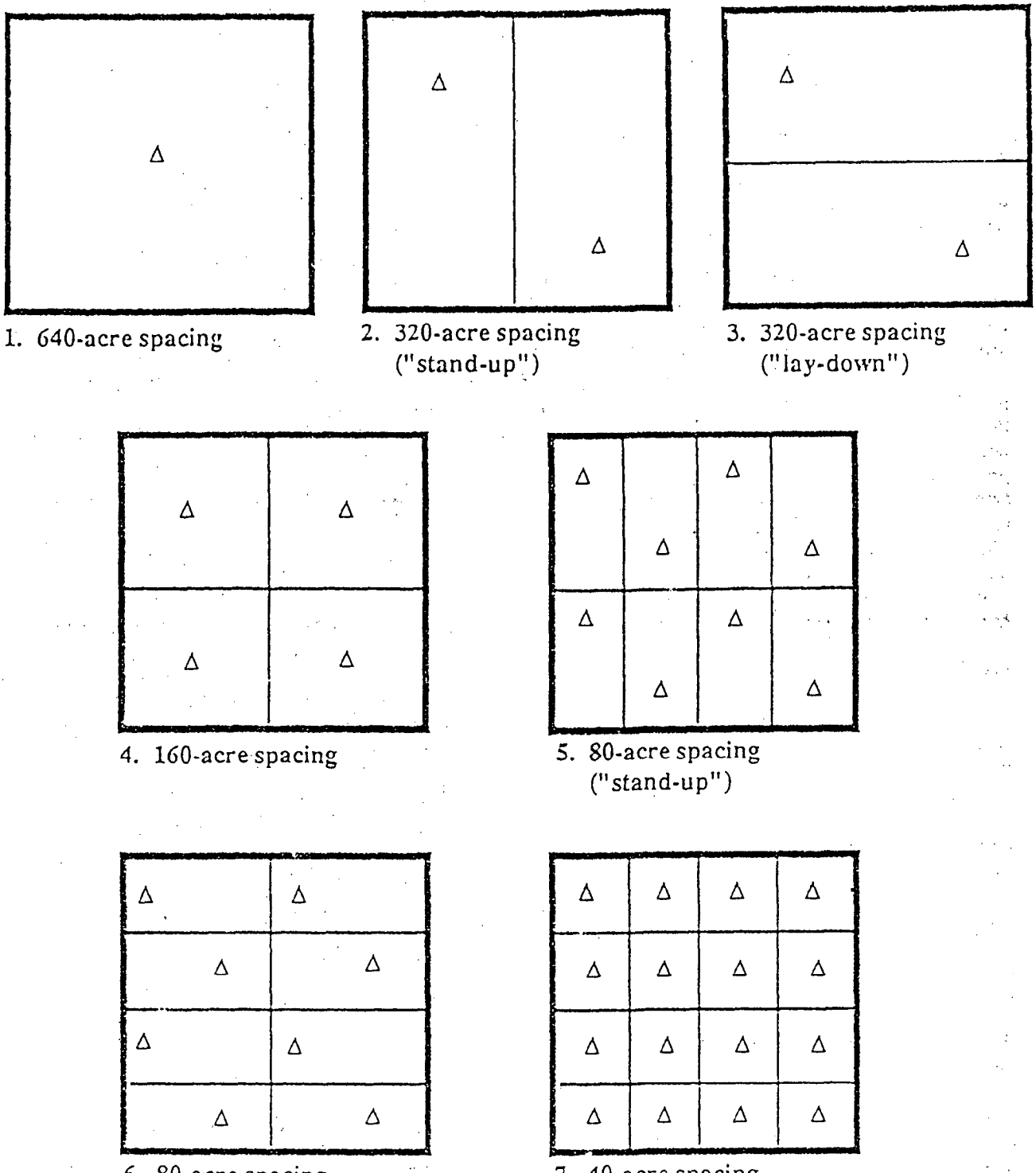
Since development wells have longer life spans than wildcat wells, access roads for development wells are better planned, designed, and constructed. Access roads are normally limited to one main route to serve the lease areas, with a maintained side road to each well. Upgrading of temporary roads may include ditching, draining, installing culverts, graveling, crowning, or capping the roadbed. The amount of surface area needed for roads would be similar to that for temporary roads mentioned earlier, and would also be dependent on topography and loads to be transported over it. Generally, main access roads are 20 to 24 feet wide and side roads are 14 to 18 feet wide. These dimensions are for the driving surface of the road and not the maximum surface disturbance associated with ditches, back cuts, or fills. The difference in disturbance is simply a matter of topography. Surface disturbance in excess of 130 feet is not unusual in steep terrain (slopes exceeding 30 percent).

When an oil field is developed on the current minimum spacing pattern of 40 acres per well, the wells are 1,320 feet apart in both north-south and east-west directions. If a section (1 square mile) is developed with 16 wells, at least 4 miles of access roads are built. In mountainous terrain, the length of access roads may be increased since steep slopes, deep canyons, and unstable soil areas must often be circumvented in order to construct stable access to the wells.

Surface use in a gas field may be similar to an oil field (though usually less) even though the spacing of wells is usually 160 acres. Though a 160-acre spacing requires only four wells per section, the associated pipeline system often has similar initial surface requirements (acreage of surface disturbance).

In addition to roads, other surface uses for development drilling may include flowlines; storage tank batteries; facilities to separate oil, gas and water (separators and treaters); and injection wells for salt water disposal. Some of the facilities may be installed at each producing well site, and others at places situated to serve several wells. These

Figure A-2. Oil and Gas Spacing for a Standard 640-Acre Section. Wells must stay at least 200' inside lease boundary line. Δ Ideally spaced well.



facilities are discussed more in the following production section.

Surface use in an oil and gas field may be affected by unitization of the leaseholds. In many areas with Federal lands, an exploratory unit is formed before a wildcat is drilled. The boundary of the unit is based on geologic data. The developers unitize the field by entering into an agreement to develop and generate it as a unit, without regard to separate ownerships. Costs and benefits are allocated according to agreed terms.

Unitization reduces the surface-use requirements because all wells are operated as though on a single lease. Duplication of field processing facilities is minimized because development operations are planned and conducted by a single unit operator, often resulting in fewer wells.

The rate of development well drilling depends on whether the field is operated on an individual lease basis or unitized, the probability of profitable production, the availability of drilling equipment, protective drilling requirements (drilling requirements to protect Federal land from subsurface petroleum drainage by off-setting non-Federal wells), and the degree to which limits of the field are known. The most important development rate factor may be the quantity of production. If the discovery well has a high rate of production and substantial reserves, development drilling usually proceeds at a fairly rapid pace. If there is some question whether reserves are sufficient to warrant additional wells, development drilling may occur at a much slower pace. An evaluation period to observe production performance may follow between the drilling of successive wells.

Development on an individual lease basis usually proceeds more rapidly than under unitization, since each lessee must drill his own well to obtain production from the field. On a unitized basis, however, all owners within the participating area share in production of a well regardless of whose lease the well is on. Spacing requirements are not applicable to unit wells. The unit is developed on whatever the operator considers to be the optimal spacing pattern to maximize recovery.

As mentioned earlier, drilling in an undeveloped part of a lease to prevent drainage of petroleum to an offset well on an adjoining lease (protective drilling) is frequently required in fields of intermingled Federal and privately-owned land. The terms of Federal leases require such drilling if the offset well is on non-Federal lands, or on Federal lands leased at a lower royalty rate. Many fields go through several development phases. A field may be considered fully developed and produce for several years, then a well may be drilled to a deeper pay zone. Discovery of a new pay zone in an existing field is a "pool" discovery, as distinguished from a new field discovery. A pool discovery may lead to the drilling of additional wells--often from the same drilling pad as existing wells--with the boreholes separated only by feet or inches. Existing wells may also be drilled deeper.

Usually 4- to 6-inch diameter pipelines transport the petroleum between the well, the treating and separating facilities, and central collection points. These lines can be on the surface, buried, or elevated. Most pipelines in the planning areas are buried.

Trucking and pipelining are the two methods used separately or in conjunction to transport oil out of a lease or unitized area. Trucking is used to transport crude oil from small fields where installation of pipelines is not economical and the natural gas in the field is not economically marketable. It is not practical to truck natural gas.

Pipelines are the most common way to transport oil and gas. If a field has substantial amounts of natural gas, separate pipelines will be necessary for oil and gas. Pipelines move the oil from gathering stations to refineries. As existing fields increase production or new fields begin production, new pipelines may be needed. These new lines usually vary in size from 4 to 16 inches in diameter, and range in length from a few miles to tie into an existing pipeline, to hundreds of miles to supply a refinery. Construction of a pipeline requires excavating and hauling equipment, a temporary and/or permanent road, possibly pumping stations, clearing the right-of-way of vegetation, and possibly blasting.

Natural gas pipelines transport gas from the wells (gathering or flow lines) to a trunk line then to the main transmission line from the area. Flow lines are usually 2 to 4 inches in diameter and may or may not be buried. Trunk lines are generally 6 to 8 inches in diameter and are buried, as are transmission lines which vary in diameter from 10 to 36 inches. The area required to construct a pipeline varies from about 15 inches wide (for a 2- to 4-inch surface line) to greater than 75 feet for the larger diameter transmission lines (24 to 36 inches). Surface disturbance is primarily dependent on size of the line and topography of the area on which the line is being constructed.

Compressor stations may be necessary to increase production pressure to the same level as pipeline pressure. The stations vary in size from approximately 1 acre to as much as 20 acres for a very large compressor system.

Construction techniques for natural gas lines are similar to those used for oil pipelines.

Production

Production in an oil field begins just after the discovery well is completed and is usually concurrent with development operations. Temporary facilities may be used at first, but as development proceeds and reservoir limits are determined, permanent facilities are installed. The extent of such facilities is dictated by the number of producing wells,

expected production, volume of gas and water produced with the oil, the number of leases, and whether the field is to be developed on a unitized basis.

The primary means of removing oil from a well in the planning areas is by pumping jacks (familiar horsehead devices). The pumps are powered by electric motors (powerlines required) or if there is sufficient casinghead gas (natural gas produced with the pumped oil), or another gas source is available, it may be used to fuel internal combustion engines.

Some wells drilled in the area produce sufficient water that must be disposed of during the operation of the well. Although most produced waters are brackish to highly saline, some are fresh enough for beneficial use. If water is to be discharged, it must meet certain water quality standards. Because water may not come from the treating and separating facilities completely free of oil, oil skimmer pits may be established between separating facilities and surface discharge.

Another method of disposing of wastewater is through subsurface injection. In Colorado, injection disposal wells are authorized by the Colorado Oil and Gas Conservation Commission (COGCC) under primacy of the U. S. Environmental Protection Agency. BLM engineers review the proposal for impacts to other minerals and groundwater, but have no approval authority over the well or target zone. When water is disposed of underground, it is always introduced into a formation containing water of equal or poorer quality. It may be injected into the producing zone from which it came or into other producing zones. In some cases, it could reduce productivity of the field and may be prohibited by state regulation or mutual agreement of operators. In some fields, dry holes or depleted producing wells are used for salt water disposal, but occasionally new wells are drilled for disposal purposes. Cement is squeezed between the casing and sides of the well to prevent the salt water from migrating up or down from the injection zone into other formations.

Underground oil is under pressure in practically all reservoirs. This pressure is usually transmitted to the oil through gas or water in the reservoir with the oil. When oil is pumped out of the well, pressure is reduced in the reservoir around the drill hole. This allows the gas or water in the reservoir to push more oil into the space next to the well. A reservoir that has mostly gas pushing the oil is called "gas drive," and one that has mostly water pushing the oil is called "water drive. " Oil that is recovered under these natural pressures is considered primary production. Primary production accounts for about 25 percent of the oil in a reservoir.

Methods of increasing recovery from reservoirs generally involve pumping additional water or gas into the reservoir to maintain or increase the reservoir pressure. This process is called secondary recovery. Recently, the trend has been to institute secondary recovery processes very early in the development of a field. Surface disturbance from a water flooding recovery system is similar to drilling and development of an oil and gas well itself; i. e., a drill pad and access road are constructed and water pipelines may be built. Surface use is increased substantially since as many as four injection wells may be used for each oil well in the field (there are many different patterns as well as many other methods of secondary recovery).

Tertiary recovery methods increase recovery rates by lowering the viscosity of the oil either by heating it or by injecting chemicals into the reservoir so that the oil flows more easily. Heating of reservoir oil can be accomplished by injecting steam into the reservoir. Tertiary recovery methods are not yet widely used in this area. By the year 2000, ultimate recovery (including secondary and tertiary recovery) from any given oil reservoir is expected to average 40 percent nationally.

Crude oil is usually transferred from the wells to tank storage facilities (a tank battery) before it is transported from the lease. If it contains gas and water, they are separated before the oil is stored in the tank battery. The treating and separating facilities are usually located at a storage tank battery on or near the well site.

After the oil, gas, and water are separated, the oil is piped to storage tanks located on or near the lease. There are normally at least two tanks; so that one tank can be filling as the contents of the other are measured, sold, and transported. The number and size of tanks vary with the rate of production on the lease, and with the extent of automation in gauging the volume and sampling the quality of the tank contents.

Horizontal Drilling

The recent development of horizontal drilling holds promise of further reductions in disturbance of surface resources and values. Use of directional, horizontal, and multiple-completion drilling technology could further reduce the number of surface locations and provide greater flexibility in siting locations and provide greater flexibility in siting locations. These techniques will also increase production and ultimately lower costs of production.

There are, however, many problems with these techniques yet to be solved before they will come into widespread use. The two most pressing of these problems in Colorado at the moment are interference with spacing patterns and the cost of the opeartions. Most industry experts agree that the latter will be solved through additional experience and some additional technical advances. The problem of spacing patterns for horizontal holes more directly involves Federal and state policy.

Current spacing patterns are based on the most efficient recovery of the resource. Spacing patterns in Colorado are set by the COGCC. Spacing patterns on Federal lands are also set by the COGCC, but with the concurrence of BLM, who has the responsibility for Federal lands. If BLM and state government were to set different spacing patterns, the result would be unsolvable drainage conflicts, lost revenues, and lost resource. It could also mean the drilling of more wells than are necessary as competing companies developed reservoirs under differing jurisdictions.

In Colorado, moset fields are developed on a 40-, 80-, 160-, 320-, or 640-acre pattern (see Figure A-2). Forty acres is the spacing pattern authorized for all unspaced areas. However, most new field operators apply for large spacing based on reservoir characteristics soon after field discovery. The spacing pattern is based on the calculated area of reservoir rock that one well can drain. The calculations are based on conventional (vertical) wells.

Horizontal wells are drilled to the producing formation, or close to it, then proceed horizontally through the producing formation. The advantage of these wells is that much more of the reservoir rock is exposed to the bore hole, and therefore, more product may be produced through one well. In addition, more than one horizontal hole may be extended from the same vertical bore or even from the horizontal portion of the bore, thereby limiting additional surface use. Spacing patterns frequently must be adjusted to permit this type of development.

For example, a field with 40-acre spacing may have one horizontal well drilled in the NW1/4NW1/4 with the horizontal portion running east all the way to the NE1/4NE1/4. This well would penetrate and produce all four of the northern tier of well spaces, thereby eliminating the need to drill three wells. The elimination of the need to drill three wells would require Federal and state approval to circumvent the spacing order. Real life examples may get much more complicated than this one.

In many cases, such as the simple example given above, the oil and gas operator may have to apply for a variance to the state spacing order. Both the BLM and COGCC are committed to working with industry on these problems to take full advantage of the new technology.

Abandonment

The life span of fields varies because of the unique characteristics of any given field. Reserves, reservoir characteristics, the nature of the petroleum, subsurface geology, and political, economic, and environmental constraints all affect the life span of the field from discovery to abandonment. The life of a typical field is 15 to 25 years. Abandonment of individual wells may start early in the life of a field and reach a maximum when the field is depleted.

Well plugging and abandonment requirements vary with the rock formations, subsurface water, well site, and the well. In all cases, all formations bearing useable-quality water, oil, gas, or geothermal resources, and/or prospectively valuable deposits of minerals will be protected. Generally, in a dry (never produced) well, the hole below the casing is filled with heavy drilling mud, a cement plug is installed at bottom of the casing, the casing is filled with heavy mud, and a cement cap is installed on top. A pipe monument giving the location, lease number, operator, and name of the well is required unless waived by the Authorized Officer. If waived, the casing may be cut off and capped below ground level. Protection of aquifers and known oil and gas producing formations may require placement of additional cement plugs.

In some cases, formerly producing wells are plugged as soon as they are depleted. In other cases, depleted wells are not plugged immediately but are allowed to stand idle for possible later use in a secondary recovery program. Truck-mounted equipment is used to plug former producing wells. In addition to the measures required for a dry hole, plugging of a depleted producing well requires a cement plug in the perforated section in the producing zone. If the casing is salvaged, a cement plug is put across the casing stub. The cement pumpjack foundations are removed or buried below ground level. Surface flow and injection lines are removed, but buried pipelines are usually left in place and plugged at intervals as a safety measure.

After plugging, the drilling rig is removed and the surface, including the reserve mud pit, is restored to the requirements of the surface management agency. This may involve the use of dozers and graders to recontour those disturbed areas associated with the drill pad plus the access road to the particular pad. The reserve pit (the part of the mud pit in which a reserve supply of drilling fluid and/or water is stored) must be evaporated or pumped dry, and filled with soil material stockpiled where the site was prepared. There will be little leakage if the pit was lined with plastic or bentonite. The area will be reshaped to a useful layout that will allow revegetation to take place, restore the landform as near as possible to its original contour, and minimize erosion. After grading the subsoil and spreading the stockpiled topsoil, the site is seeded with a grass mixture that will establish a good growth. A fence may be erected to protect the site until revegetation is complete, particularly in livestock concentration areas.

Appendix C

CONDITIONS OF APPROVAL

Introduction

Post-lease operations proposals are reviewed to ensure conformance with the plan. The mitigative measures listed represent the post-lease environmental protection to which BLM is committed as a result of the analysis in the plan/EIS. Note that there is no commitment to the specific wording of a Condition of Approval (COA).

The listed mitigative measures may apply to all oil and gas exploration and development activities and associated rights-of-way. The Authorized Officer will choose among these measures at the field development stage to mitigate or avoid environmental impacts identified on a site-specific basis. When attached to an approval document, the measures are known as COAs. The Authorized Officer is not limited to the list of COAs shown here, but may development others as unforeseen impacts occur as long as the new COAs conform with the limitations of the granted lease rights and the guidance set forth in this plan and subsequent amendments.

COAs are not added to applications if they are unnecessary (do not apply to the case in question) or, are duplicative, as when the mitigative measure is already incorporated in the operator's submittal.

Geophysical Operations

The following guidance is for the development of standards to be attached, as appropriate, to the Notice of Intent (NOI) for geophysical operations at the discretion of the Authorized Officer and in accordance with the resource management plan/environmental impact statement (RMP/EIS) record of decision. The statements below will be used as guidance by BLM field personnel in determining what protective measures will be used on geophysical operations. Only those items pertaining to a given operation will be appended to the NOI, and only if they are not already contained in the proposed plan of operation. A.

A. Notification

If noncompliance with terms and conditions occurs, the operator will be notified by BLM and instructed as to the appropriate action. If the operator fails to take appropriate action, the operator will be subject to enforcement action in accordance with 43 CFR 3163.

Wildfires begun or sighted during seismic operations will be reported immediately to the Canon City Fire Dispatch Office and/or the resource area office of jurisdiction. The operator is liable for the full cost of fire suppression of all fires on or in the vicinity of the project set or caused by his employees, whether set directly or indirectly as a result of operations.

The operator shall notify the Authorized Officer, or his representative at least 48 hours prior to beginning operations.

The operator shall also report progress on a weekly basis until completion. A prework conference may be required.

Immediately upon completion of operations, a Notice of Completion of Oil & Gas Exploration Operations and an updated BLM planimetric map or USGS topographic map showing revisions to the original NOI shall be submitted to the Authorized Officer. The map will be used to perform a final compliance inspection of the exploration area.

A copy of all COAs, along with a copy of the submitted NOI, shall be kept in the field by each seismic crew, for inspection by BLM personnel.

Any exploration greater than one-quarter mile from the proposed seismograph line route filed with the NOI will require prior approval from the Authorized Officer.

B. Cultural Resources

The Programmatic Agreement between the BLM, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation, signed February 6, 1987, contains guidance for oil and gas, seismic, and other land use operations. Appendix B of the agreement specifically outlines BLM procedures for both oil and gas APDs and for seismic operations. In addition, guidance is provided in : "Handbook for Cultural Resources Inventory/Mitigation" (Colorado State Office Release 8-13), dated 1990.

In addition to the above guidance, the operator shall immediately bring to the attention of the Authorized Officer any and all antiquities or other objects of historic, paleontological, or scientific interest, including, but not limited to, prehistoric or historic ruins or artifacts discovered as a result of operations. The operator and the Authorized Officer shall consult and determine the best option for avoiding or mitigating site damage.

Operators are also reminded that the removal, injury, defacement, or alternation of any object of scenic, archaeological, historical, or scientific interest is a federal crime and may be punishable by fine and/or jail terms.

C. Threatened, Endangered, and Sensitive Species

An inventory for threatened and endangered plant species is required on any portions of the line or staging areas proposed in known or realistic potential habitat for threatened, endangered, or candidate plant species. A map

will be maintained by the BLM outlining these areas and made available to the public.

D. Construction

All infestations of noxious or poisonous weeds, resulting from surface disturbance caused by the operator, will be controlled before spreading occurs into the surrounding area. Method of weed control will be reviewed by the Authorized Officer prior to commencement.

No dirt work nor clearing of vegetation will occur without specific approval. All merchantable timber and/or firewood shall be purchased by the operator at the total appraised price that is determined by the BLM.

During periods of adverse conditions such as thawing, heavy rains, snow, or flooding, all activities off existing maintained roads that create excessive surface rutting will be suspended. When adverse conditions exist, the operator will contact the Authorized Officer for an evaluation and decision based on soil type, slope, vegetation, and cover.

Drill hole cuttings will be returned to the hole if possible, or at a minimum, raked and spread out so as not to impede regrowth of vegetation or to create erosion problems.

Operations shall be done in a manner which prevents damage, interference, or disruption of water flows and improvements associated with all springs, wells, or impoundments. It is the operator's responsibility to enact the precautions necessary to prevent damage, interference, or disruptions. Vibrator sources will not be operated closer than 300 feet, and large explosive charges, greater than 40 pounds, will not be used closer than 1,320 feet of springs, wells, or impoundments. The Authorized Officer may approve closer source distances if the contractor demonstrates that the resource will be protected.

During periods of adverse conditions caused by climatic factors such as thawing, heavy rains, snow, or flooding, all activities off existing maintained roads that create excessive surface rutting will be suspended. When adverse conditions exist, the operator will contact the Authorized Officer for an evaluation and decision based on soil types, slope, vegetation, and cover.

No fence will be cut unless no other alternative exists. Before cutting through any fences, the operator shall firmly brace the fence on both sides of the cut; a temporary gate will be installed for use during the course of operations unless the fence is immediately repaired. Upon completion of operations, fences shall be restored to at least their original condition.

Activities of the seismic operators shall not prevent, obstruct, nor unduly interfere with any activities of other authorized users of the public lands. Removal or alteration of existing improvements (fences, cattle guards, etc.) is not allowed without prior approval. Fences are to be braced to BLMs standards prior to cutting them.

All debris, such as paper, cans, wire, flagging, or other trash, shall be removed and properly disposed of upon completion. No oil or lubricants shall be drained onto the ground. All vehicles (including drills) will be limited to existing roads, except in approved areas. Improvement of existing roads and trails is not permitted, unless prior approval is obtained.

Water for drilling purposes will not be obtained from federally owned or controlled water sources such as reservoirs and springs unless specific permission is obtained from the Authorized Officer.

Any available information concerning water sands or artesian flows must be reported to the resource area office.

Whenever possible, a portable mud pit shall be used when drilling with fluids.

There will be no straight line of sight dozing. Any path dozed through a timbered area will take an irregular path. Any pushed trees are to be stockpiled adjacent to the line so they are readily retrievable without additional disturbance. All trees are to be pulled and spread back onto the line or access route.

Tall brush, sagebrush parks and open areas: There will be no removal of brush or grass by blading. Brush may be crushed or removed by keeping the blade 6 inches off the ground surface. In open or brush areas, vehicle paths will take an irregular path to discourage line of sight paths.

Improvement of existing roads or trails: Blading will be allowed only if the trail is impassable by vehicles or geophysical equipment. No widening nor realignment will be allowed. Existing trails may have to be reclaimed or closed.

New trails can be constructed only when vehicle and equipment passage is impossible and only with the concurrence of the Authorized Officer. No straight line of sight trails will be allowed. All trails will be reshaped to original contour (including bench cuts). Waterbars will be placed on slopes as directed by the Authorized Officer.

Construction of drainage crossings which cannot otherwise be crossed: Existing fords are to be used if possible. A cut and stockpile process will be used to create a low water crossing or upgrade an existing crossing unless otherwise specified by the Authorized Officer.

E. Explosives

Powder magazine sites on public lands must be approved in writing by the area manager prior to use. The transportation, storage, and use of explosives on BLM surface will be done in accordance with ATF P 5400. 7 (11/82).

F. Rights-of-Way

Access to Federal lands across non-Federal lands is not guaranteed by the government. Permission to enter or cross private, or state-owned lands must be obtained from the landowner(s).

G. Miscellaneous

All personnel (contractors, subcontractors) working in the field with the seismic operator will be familiar with and follow the conditions appended to the NOI.

Helicopters will operate between staging areas and seismic line within corridors and at altitudes that allow safe, efficient, and environmentally sensitive operations. Operating parameters will be determined on a line-to-line basis as mutually agreed by BLM, helicopter operator, and contractor.

Aircraft landing sites on public lands must be approved in writing by the area manager prior to use.

H. Reclamation

All surface disturbance would be recontoured and revegetated according to an approved reclamation plan.

Reclamation of disturbed areas shall be completed, as directed by the Authorized Officer, within 30 days of terminating seismograph work on any line. Delay of reclamation for any reason, such as weather, must be approved by BLM. Adequate vegetative cover (and seed mixture, based on site-specific analysis, to be used) shall be established by the Authorized Officer.

Application for Permit to Drill Operations

The following guidance will be used to develop COAs, which are attached, as appropriate, to approved APDs, sundry notices, or oil and gas related right-of-way actions at the discretion of the Authorized Officer and in accordance with the RMP/EIS record of decision.

This appendix shows the most common COAs used; however, the reader is reminded that COAs are designed for specific operations. In practice, COAs shown below may or may not be used on any given approval document, and other COAs, not specifically stated here, will be written to accomplish the tasks envisioned in this plan. The categories shown below are a good representation of the list of mitigative measures considered by BLM resource specialists for every approved field operation.

A. Notification

In order for BLM inspectors to check the initial construction operations, it is necessary that BLM be notified when construction begins. To help ensure that all parties understand the requirements for construction, the operator must ensure that all employees and subcontractors are adequately aware of the COAs. Examples of such notification requirements are shown below:

The operator or his contractor will contact the approving resource area office 48 hours before beginning any work on public land.

The operator will give the dirt contractor a copy of the Surface Use Plan and any additional BLM COAs before any work begins. A copy of the approved Surface Use Plan will be available onsite for inspection during construction.

The operator or his contractor will contact the approving resource area office 48 hours before starting reclamation work and within 48 hours of completion of reclamation work.

Proper precautions shall be taken at all times to prevent or suppress fires. Range or forest fires will be reported to the BLM district or resource area office. All other fires or explosions that cause damage to property, equipment, loss of oil or gas, or result in injuries to personnel will be reported to the Authorized Officer.

B. Other Agency Approvals

Some operations on public lands affect adjoining private lands and require approval by state, local, or other Federal agencies. It is solely the responsibility of the operator to be aware of these requirements and gain the necessary approvals. Upon notification by another agency of operators' failure to obtain necessary permitting, a notice of noncompliance will be issued and operations may be suspended. In a few cases, BLM wants to make it clear that the "BLM approved" operations may not proceed until such approval is granted. In those cases, a COA is appended to the approved application such as: Use of water for operations will be approved by obtaining a temporary use permit from the Colorado State Water Resources Engineer and by receiving permission from the landowner or surface managing agency to use the land containing the water source.

C. Cultural Resources

The Programmatic Agreement between the BLM, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation, signed February 6, 1987, contains guidance for oil and gas, seismic, and other land use opera-

tions. Appendix B of the agreement specifically outlines BLM procedures for both oil and gas APDs and for seismic operations. In addition, guidance is provided in : "Handbook for Cultural Resources Inventory/Mitigation" (Colorado State Office Release 8-13), dated 1990.

In addition to the above guidance, the operator shall immediately bring to the attention of the Authorized Officer any and all antiquities or other objects of historic, paleontological, or scientific interest, including, but not limited to, prehistoric or historic ruins or artifacts discovered as a result of operations. The operator and the Authorized Officer shall consult and determine the best option for avoiding or mitigating site damage.

Operators are also reminded that the removal, injury, defacement, or alternation of any object of scenic, archaeological, historical, or scientific interest is a federal crime and may be punishable by fine and/or jail terms.

D. Threatened, Endangered, and Sensitive Species

The lessee may be required to provide inventory information for certain species if it is determined that inadequate information is available to make appropriate decisions relating to mitigation. These species could involve threatened, endangered, sensitive and/or rare plant or animal species, or other species protected by law or of high interest, such as bighorn sheep lambing areas, elk calving areas, raptors, etc.

Apply "Suggested Practices for Raptor Protection on Powerlines" on all proposed transmission lines to be constructed to ensure they are properly grounded to prevent unnecessary electrocution of raptors.

The locations of all known populations of Colorado BLM sensitive plants and selected high priority remnant vegetation associations would be protected from human-induced surface disturbing activities to the extent such protection does not unduly hinder or preclude exercising valid existing rights. The area of protection will include the actual location of the populations or occurrences of important vegetation associated to receive protection, and shall be determined in consultation and coordination with the Colorado Natural Areas Program (CNAP).

Those populations/occurrences, upon which analysis determines protection to be necessary, shall be protected by: 1) requiring relocation or rerouting of proposed well sites, pipelines, roads, other surface facilities, etc., or 2) applying other protective mitigation (i. e., fencing). BLM will effectively mitigate potential impacts to important populations/occurrences to the degree that existing development rights are not unduly hindered or precluded.

E. Resources (other than Oil and Gas)

Surface-disturbing activities within or adjacent to intermittent or perennial water sources, associated floodplains, and riparian areas will only be allowed where mitigative measures can be employed to protect floodplains, water quality, and riparian values.

Well pads, roads, and facilities will be constructed and maintained to avoid unnecessary impacts to air quality.

Raptor and sandhill crane nests will be protected from human-induced surface-disturbing activities to the extent such protection does not unduly hinder or preclude exercising valid existing rights.

All trees requiring removal shall be disposed of by the operator.

Where earth blading is required, stumps shall be removed and scattered or buried in an area designated by the Authorized Officer. Where earth blading is not required, stump height shall not exceed 12 inches. A wood permit from BLM for the wood removed (for the appraised value) will be required prior to any clearing.

Water wells drilled to provide water for drilling purposes will be approved by, and offered to, BLM for use prior to plugging the water well. Water rights will be held by BLM. The BLM will be notified of any water aquifers encountered during drilling that could be developed for water prior to final plugging of the well.

All operations will be conducted so as not to cause pollution or change the character of streams, lakes, ponds, water holes, seeps, or marshes. This relates directly to damages caused to fish and wildlife resources. Surface disturbance that causes active soil movement will be corrected.

F. Construction

Linear-type facilities such as roads, powerlines, and pipelines shall cohabit and follow a common route unless otherwise approved by the Authorized Officer. Surface disturbance will be minimized.

Well pads, roads, and facilities will be located to minimize visual impacts.

To protect watersheds from accelerated erosion, increased slumping, and increased sediment and salinity loading, all development activities may be curtailed at the discretion of the Authorized Officer during periods when the soil is saturated.

Trash and garbage must be contained in an closed receptacle or in an earthen pit. If an earthen pit is used, it must be covered to prevent contents from escaping. Burning

and/or burying is not authorized. Contents from a trash receptacle or pit must be hauled to an approved county landfill. This pertains to all phases of lease operations.

Surface disturbance and vehicular travel will be limited to the approved location and approved access route. Any additional area needed must be approved in advance.

Above-ground facilities will be painted to blend with the surrounding environment using a specified color from the Rocky Mountain Regional Committee Standard Environmental Color chart.

1. Roads (On Lease)

Existing roads should be used to the extent possible. Additional roads, if needed, shall be kept to an absolute minimum and the location of routes must be approved by BLM prior to construction. On determination of an impending field development, a transportation plan will be requested to reduce unnecessary access roads. Roads will be constructed and maintained to BLM road standards (BLM Manual Section 9113) unless otherwise authorized by the Authorized Officer.

Companies controlling roads that provide access into crucial wildlife areas may be required to close the road with a lockable gate to prevent general use of the road during critical periods of the year when resource problems are experienced (during hunting seasons, winter, etc.). This restrictive measure will be applied where needed to protect wildlife resources or to minimize environmental degradation.

Use of closed road segments will be restricted to legitimate, authorized agents of: 1) the lessee and/or their subcontractor(s), 2) BLM, 3) other agencies with a legitimate need (CDOW, other law enforcement agencies, etc.). Unauthorized use or failure to lock gates during specified time frames by the lessee or its subcontractors would be considered a violation of the terms of the APD or associated grants. This will apply to BLM roads and other roads on public lands.

Improvement or upgrading of existing roads and trails shall conform to the same requirements as the approval APD.

The operator shall regularly maintain all roads used for access to the lease operation. This shall include installation of additional surfacing and surface drainage control structures needed, which was not foreseen during construction.

At cessation of operations, the Authorized Officer will decide which roads will be closed and rehabilitated and which will remain open for public use.

Any access routes previously available to the public will not be unnecessarily blocked off from public use.

Cattle guards heavy enough to handle proposed road traffic will be installed whenever access roads are through pasture gates or fences. These cattle guards shall be maintained on a regular basis to ensure their effectiveness at turning livestock. This includes cleaning out under cattle guard bases when needed.

Improvement to existing access will be necessary and limited to a 14-foot crowned and ditched road surface with turnouts as needed and minimum disturbance of surrounding soil and vegetation (abrupt back-sloped borrow ditch). New construction will be limited to the same specifications as above. Cleared trees and brush along the road right-of-way will be windrowed to the side in convenient clearings. Surfacing material will not be placed on the access road or location without prior BLM approval.

The operator will be required to construct waterbars on abandoned roads and pipeline routes. General guidelines for installation of waterbars are: less than 2-percent grade--200-foot spacing; 4- to 5-percent grade--75-foot spacing; greater than 5-percent grade--50-foot spacing. Unstable soils may require a closer spacing, whereas the spacing may be greater on stable soils and rock outcroppings. The waterbars shall be constructed to drain freely to the natural ground level and to prevent siltation and clogging.

New roads constructed for oil and gas purposes within crucial big game winter range and isolated and/or roadless areas will be reclaimed upon completion of the oil and gas operation.

2. Pads

Selecting Locations for Well Sites, etc. : In planning well sites, tank batteries, sump, reserve and mud pits, and pumping stations, the operator shall select locations that involve the least disruption to scenic values and other surface resources. The operator shall employ construction techniques and design practices, including selection of material, camouflage techniques, and rehabilitation practices that will preserve scenic aesthetic qualities. The following guidelines can be used by operators to assist in minimizing surface disturbance and to aid in the maintenance of the best possible conditions for rehabilitation.

Steep slopes shall be avoided, the site shall be located on the most level location obtainable that will accommodate the intended use.

View the site location as to how it will affect the road location.

What may be gained on a good location may be lost from an adverse access route.

Adjust the site layout to conform to the best topographic situation. Deep vertical cuts and steep long fill slopes should

be avoided. All cut and fill slopes should be constructed to the least percent slope practical.

The top 12 inches of soil material will be removed from the location and stockpiled separately from the trees on the location. Topsoil along the access will be reserved in place.

3. Pits (All)

Excavations used for the permanent impoundment of usable water should be sloped at a 3:1 grade to establish safe access for humans, livestock, and wildlife.

A minimum of 2 feet of free board will be maintained between the maximum fluid level and the top of the berm. These pits will be designed to exclude all surface runoff. The pits will have the maximum volume in cut.

Prior to closure, a randomly selected sample of drilling pits within established fields will be sampled for hazardous materials. In wildcat wells, all pits will be sampled for hazardous materials prior to abandonment, unless specifically exempted by the Authorized Officer. Sampling will be done by an independent contractor agreeable to the operator and Authorized Officer. Testing will be done at a lab with quality control standards acceptable to USGS.

Final written certification is required that there are no hazardous chemicals on the RCRA list left in the drilling fluids within the mud pit. If the operator cannot provide certification, the drilling fluids and pit liner must be disposed at a federally approved hazardous materials site.

Reserve and other containment pits are used during the exploration and/or operation of the lease may require fences and/or other devices to exclude migratory birds, livestock, and/or wildlife. The need and type of protective requirement will be determined on a case-by-case basis.

All pits, cellars, rat holes, and other bore holes unnecessary for further lease operations, excluding the reserve pit, will be back-filled immediately after the drilling rig is released to conform with surrounding terrain. Pits, cellars and/or bore holes that remain on location must be fenced as specified for the reserve pit.

Reserve pit fluids will be allowed to evaporate through the entire summer season (June through August) after drilling is completed, unless an alternate method of disposal is approved. After the fluids disappear, the reserve pit muds will be allowed to dry sufficiently to allow back-filling. The back-filling of the reserve pit will be done so the muds and associated solids will be confined to the pit and not squeezed out and incorporated in the surface materials. There will be a minimum of 3 feet of cover (overburden) on the pit. When the work is complete, the pit area will support the weight of heavy equipment without sinking.

Semi-closed or closed mud systems may be required where conditions warrant. Produced water will be injected, contained in a lined pit, or hauled to a federally approved disposal facility.

Installed pit liners must be impermeable and must be resistant to weather, sunlight, hydrocarbons, aqueous acids, alkalies, salt, fungi, or other substances likely to be contained in the drilling fluids or produced water.

The reserve pit liner will be of sufficient strength and construction to ensure impermeability. The liner will be underlain by a suitable bedding material and other measures taken as needed to protect the integrity of the liner.

A leak detection system will be installed to monitor lined reserve pits. This system must be installed in order to detect liner leakage. The leak detection plan must be submitted to and approved by the Authorized Officer during APD approval. This plan must include the system design including line installation, monitoring plan, and the individual responsible for the required monitoring.

For lined pits, the liner and contents will be buried in place and effectively capped with clay or other impermeable materials, or disposed of in a non-polluting method acceptable to the Authorized Officer.

If air or gas drilling, the operator shall control the blooie line discharge dust by use of water injection or any other acceptable method. The blooie line discharge shall be a minimum of 100 feet from the blow out preventer and be directed into the blooie pit so that the cuttings and waste are contained in the pit.

4. Pipelines

Alignment, siting, and reclamation of pipelines and flowlines should be designed to conform to adjacent terrain and to prevent or minimize vehicular travel. If maintenance is necessary in problem areas, consider use of an all-terrain vehicle (ATV) or snowcat, etc. , in lieu of regular truck. Surface disturbance for pipeline construction would be restricted to the minimum amount necessary, as determined by the Authorized Officer.

Relocation of portions of the line may be necessary to reduce the impact to surface resources.

For associated pipeline rights-of-way, except rights-of-way expressly authorizing a road after construction of the facility is complete, the right-of-way holder shall not use the right-of-way as a road for purpose other than routine maintenance. Necessary routine maintenance will be determined through consultation with the Authorized Officer.

Existing telephone, telegraph, powerlines, pipelines, roads, trails, fences, ditches, and like improvements shall be

protected during construction, operation, maintenance, and termination of an oil and gas facility. Damage caused by such activities shall be properly repaired to a condition satisfactory to the Authorized Officer or the facility owner/operator.

Pipeline routes will be graded to conform to the adjacent terrain, waterbarred, and reseeded.

When clearing is necessary, the width disturbed will be kept to a minimum. Bladed materials shall be placed back into the cleared route upon completion of construction.

Pipeline construction shall not block, dam, nor change the natural course of any drainage. Suspended pipelines will provide adequate clearance for runoff.

Pipeline trenches shall be compacted during back-filling. These trenches will be maintained in order to correct settlement and prevent erosion. Waterbars and other erosion control devices will be repaired as necessary.

Pumping stations shall be kept in a neat and well-maintained condition.

Abandonment and Rehabilitation: Reclamation and abandonment of pipelines and flow-lines may involve replacing fill in the original cuts, reducing and grading cut and fill slopes to conform to the adjacent terrain, replacement of surface soil material, waterbarring, and revegetating in accordance with rehabilitation practices.

Crossing over pipelines owned by other companies shall be accomplished in accordance with an agreement secured with that company.

G. Drilling

Water for drilling purposes will not be obtained from federally owned or controlled water sources such as reservoirs and springs unless specified permission is obtained from the Area Manager.

The BLM will be notified of any water aquifers encountered during drilling that could be developed for water prior to final plugging of the dry hole. Water rights will be held by the BLM.

H. Production

Compaction and construction of the berms surrounding tank batteries will be constructed prior to storage of fluids and designed to prevent lateral movement of fluids through the utilized materials. The berms must be constructed to contain at minimum 120 percent of the storage capacity of the largest tank within the berm. All loading lines will be placed inside the berm.

Surface buildings, supporting facilities, and other structures, not required for present or future operations, shall be removed upon termination of use.

All improvements, including fences, gates, cattle guards, roads, trails, pipelines, bridges, water developments, and control structures will be maintained in a serviceable and safe condition.

Any release of production water on or across the land will need prior approval by the BLM.

Mud, separation pits, and other containments used during the exploration or operation of the lease for the storage of oil and other hazardous materials shall be adequately fenced, posted, or covered. Additional protective measures may be needed to minimize hazards and prevent access to humans, livestock, waterfowl, and other wildlife. The pits should be allowed to dry before back-filling and rehabilitation.

All production and storage facilities must have adequate protection from spills.

The Spill Prevention Control and Countermeasure Plan required by the Environmental Protection Agency must be available for inspection at all appropriate field offices. All spills must be reported to the Authorized Officer.

The reserve pit and that portion of the location and access road not needed for production or production facilities will be reclaimed as described in the reclamation section. Enough topsoil will be kept to reclaim the remainder of the location at a future date. This remaining stockpile of topsoil will be seeded in place using the prescribed seed mixture.

A gate may be required to limit public access during the wildlife winter use periods (December 15 through March 31) when the operator maintains a road open for winter use.

If the well is located within 2,500 feet (one-half mile) of residences, appropriate noise mitigation (i. e. , hospital muffler, vegetation screening, electric motors, etc.) will be employed to ensure adherence to Federal, state, and local noise standards during operation of the well.

Within 60 days of completion of construction, the holder shall provide the Authorized Officer an as-built survey of facilities as constructed.

I. Reclamation

All disturbed areas not needed for lease operations will be revegetated as soon as possible. The operator will re-establish perennial vegetation compatible to surrounding undisturbed vegetation. The plant species to be seeded and the seeding rate will be approved by the Authorized Officer prior to seeding. Successful revegetation will be considered

completed when the percent canopy cover is equal to surrounding undisturbed vegetation. The species considered in measuring percent cover will be those seeded as well as desirable pre-existing species. Undesirable weedy species such as kuchia, cheatgrass, and other noxious weeds will not be included unless otherwise directed by the Authorized Officer. The operator will continue revegetation efforts using any and all cultural methods available until this standard is met.

Noxious weeds introduced because of soil disturbance and reclamation will be treated by methods approved by the Authorized Officer. These methods may include biological, mechanical, or chemical. Should chemical methods be approved, the lessee must submit a Pesticide Use Proposal to the Authorized Officer 60 days prior to the planned application date.

In the event a producing well is developed, the unused disturbed areas surrounding the well location will be recontoured to appropriate confirmation (one which allows lease operations and avoids steep cut and fill slopes) as soon as possible. Some or all of the stockpiled topsoil will be evenly distributed over these recontoured areas. Brush cleared prior to construction of the well site shall be scattered back over the recontoured area.

Mulching of the seedbed following seeding may be required under certain conditions (i. e., expected severe erosion), as determined by the surface owner/manager.

Surface topsoil-like material, if available, will be stripped from all areas where surface disturbance is necessary and stockpiled in a manner and location that will allow easy replacement. These stockpiles shall be protected from loss. After reshaping the site, soil material should be distributed to a uniform depth that will allow the establishment of desirable vegetation. The disturbed areas shall be scarified prior to replacement of surface soil material.

All disturbed areas will be recontoured to blend as nearly as possible with the natural topography. This includes removing all berms and refilling all cuts. All compacted portions of the pad will be ripped to a depth of 12 inches unless in solid rock.

After revegetation is complete, the stockpiled trees will be scattered evenly over the disturbed areas. The access will be blocked to prevent vehicular access.

Seed certification tags will be submitted to the Authorized Officer for seed used in reclamation.

Prior to abandonment of the facilities authorized by this grant, the holder shall contact the Authorized Officer to arrange a joint inspection of the right-of-way. The inspection will be held to agree on an acceptable abandonment and rehabilitation plan. The Authorized Officer must approve the plan in writing prior to the holder commencing any abandonment and/or rehabilitation activities. The plan may include removal of surfacing material from the road, recontouring, replacement of topsoil, seeding, mulching, etc.

Cut and fill slopes shall be reduced and graded to conform the site to the adjacent terrain. The disturbed sites will be prepared to provide a seedbed for re-establishment of desirable vegetation and reshaped to blend with the natural contour. Such practices may include contouring, terracing, gouging, scarifying, mulching, fertilizing, seeding, and planting.

J. Miscellaneous

On determination by the Authorized Officer of an impending field development, a transportation plan will be required to reduce unnecessary access roads.

Additional site surveys, grading plans, and engineering designs may be required in VRM Class II areas.

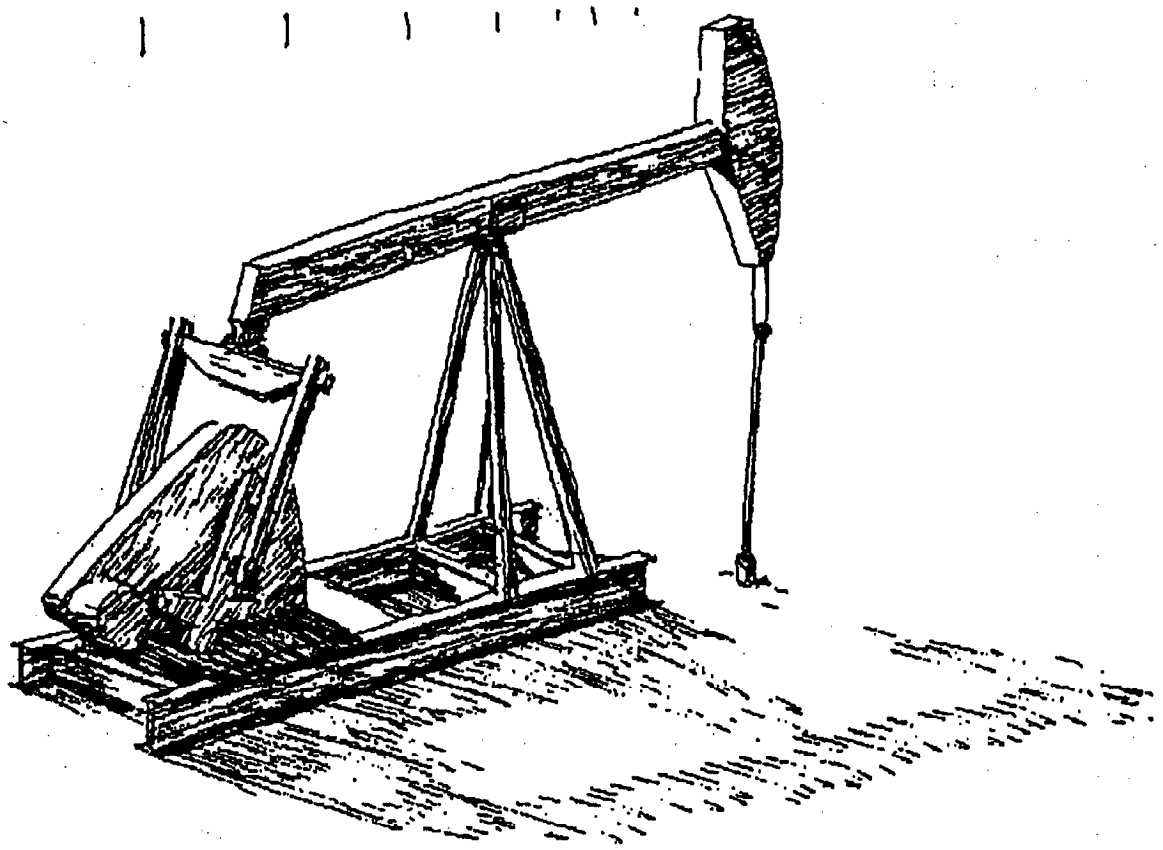
Should additional site-specific environmental analyses at the time of exploration or development reveal the need for additional restrictions or the continuance of existing lease stipulations, these restrictions will become part of the development or operational plan.

All survey monuments, witness corners, reference monuments, and bearing trees shall be protected against destruction, obliteration, or damage. Any markers so affected must be re-established at the lessee's expense in accordance with accepted BLM survey practices defined in the "Manual of Surveying Instructions for the Survey of the Public Lands of the United States."

Burning of solid or liquid wastes usually requires a burning permit. The permit must be obtained from the state air quality agency.

SPECIAL STIPULATIONS

The following stipulations will be added, as prescribed in this 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.



TIMING LIMITATION STIPULATION

No surface use is allowed during the following time period(s). This stipulation does not apply to operation and maintenance of production facilities.

December 15 to March 31

On the lands described below:

For the purpose of (reasons): Protecting crucial deer, elk, antelope, or bighorn sheep winter range from activities that would cause these species to abandon areas of crucial winter cover and forage for less suitable ranges; San Luis Resource Management Plan (decisions RCO 1-1, 2-1, and 7-1).

An exception to this stipulation may be approved if it can be demonstrated to the satisfaction of the Authorized Officer that the crucial winter range is (1) not being utilized and is expected to remain in such a condition because of a temporary change in climate and/or habitat, or that (2) impacts can be mitigated to avoid the abandonment of crucial winter cover and forage.

This stipulation may be waived by the Authorized Officer only upon a determination that crucial winter range does not exist within the lease.

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 Manual 1624 and 3101 or FS Manual 1950 and 2820.)

Form #/Date

Serial No.

TIMING LIMITATION STIPULATION

No surface use is allowed during the following time period(s). This stipulation does not apply to operation and maintenance of production facilities.

February 15 to July 15

On the lands described below:

For the purpose of (reasons): Protecting **waterfowl** from activities that would alter breeding behavior, increase the incidence of nest abandonment, and decrease breeding success; San Luis Resource Management Plan (decisions RCO 1-2, LUA 4-4)

An exception to this stipulation may be approved if it can be demonstrated to the satisfaction of the Authorized Officer that the waterfowl nesting area is (1) not being utilized and is expected to remain in such a condition because of a temporary change in climate and/or habitat, or that (2) impacts can be mitigated to result in the avoidance of nest abandonment and decreased breeding success.

This stipulation may be waived by the Authorized Officer only upon a determination that waterfowl nesting areas do not exist with the lease.

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 Manual 1624 and 3101 or FS Manual 1950 and 2820.)

Form #/Date

TIMING LIMITATION STIPULATION

No surface use is allowed during the following time period(s). This stipulation does not apply to operation and maintenance of production facilities.

May 15 to July 15

On the lands described below:

For the purpose of (reasons): Protecting **pronghorn antelope range** from activities which would force antelope into less suitable range during the fawning season; San Luis Resource Management Plan (decision RCO 1-1).

An exception to this stipulation may be approved if it can be demonstrated to the satisfaction of the Authorized Officer that the antelope fawning area is (1) not being utilized and is expected to remain in such a condition because of a temporary change in climate and/or habitat, or that (2) impacts can be mitigated to result in avoiding antelope disturbance during fawning season.

This stipulation may be waived by the Authorized Officer only upon a determination that antelope fawning range does not exist within the lease.

for such changes. (For guidance on the use of this stipulation, see BLM Manual 1624 and 3101 or FS Manual 1950 and 2820.)

Form #/Date

Serial No.

NO SURFACE OCCUPANCY STIPULATION

No surface occupancy or use is allowed on the lands described below (legal subdivision or other description):

For the purpose of: Protecting lambing areas selected by **bighorn sheep** for topography, slope, aspect, and escape cover; San Luis Resource Management Plan (decision LUA 2-2).

An exception to this stipulation may be approved if it can be demonstrated to the satisfaction of the Authorized Officer that the lambing area 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, which avoid a change in the topography, slope, aspect, and escape cover.

This stipulation may be waived by the Authorized Officer only upon a determination that bighorn sheep lambing areas do not exist within the lease.

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 Manual 1624 and 3101 or FS Manual 1950 and 2820.)

Form #/Date

NO SURFACE OCCUPANCY STIPULATION

No surface occupancy or use is allowed on the lands described below (legal subdivision or other description):

For the purpose of: Protecting the scenic and recreational value as well as the physical improvements of the **Monte Vista Park**; San Luis Resource Management Plan (decision LUA 1-2).

An exception to this stipulation may be approved if it can be demonstrated to the satisfaction of the Authorized Officer that operations can be conducted without causing unacceptable impacts to the scenic, recreational, and physical improvement values.

This stipulation may be waived by the Authorized Officer only upon a determination that the Monte Vista Park is no longer utilized for recreational purposes.

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 Manual 1624 and 3101 or FS Manual 1950 and 2820.)

Form #/Date

Serial No.

NO SURFACE OCCUPANCY STIPULATION

No surface occupancy or use is allowed on the lands described below (legal subdivision or other description):

For the purpose of: Protecting the historic, scenic and recreational values as well as the physical improvements of the **Pike Stockade Historic Site**; San Luis Resource Management Plan (decision LUA 1-2).

An exception to this stipulation may be approved if it can be demonstrated to the satisfaction of the Authorized Officer that operations can be conducted without causing unacceptable impacts to the historic, scenic, recreational and physical improvement values.

This stipulation may be waived by the Authorized Officer only upon a determination that Pike Stockade Historic Site no longer exists.

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 Manual 1624 and 3101 or FS Manual 1950 and 2820.)

Form #/Date

NO SURFACE OCCUPANCY STIPULATION

No surface occupancy or use is allowed on the lands described below (legal subdivision or other description):

For the purpose of: Protecting the recreational and scenic values of the **Flat Top SPNM** in its natural setting; San Luis Resource Management Plan (decision LUA 8-2).

An exception to this stipulation may be approved if it can be demonstrated to the satisfaction of the Authorized Officer that operations can be conducted without causing unacceptable impacts to the recreational, scenic and natural values.

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 Manual 1624 and 3101 or FS Manual 1950 and 2820.)

Form #/Date

Serial No._____

NO SURFACE OCCUPANCY STIPULATION

No surface occupancy or use is allowed on the lands described below (legal subdivision or other description):

For the purpose of: Protecting the natural and scenic values of the **Rio Grande River Corridor** ACEC; San Luis Resource Management Plan (decision LUA 9-3).

An exception to this stipulation may be approved if it can be demonstrated to the satisfaction of the Authorized Officer that operations can be conducted without causing unacceptable impacts to the natural and scenic values.

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 Manual 1624 and 3101 or FS Manual 1950 and 2820.)

Form #/Date

NO SURFACE OCCUPANCY STIPULATION

No surface occupancy or use is allowed on the lands described below (legal subdivision or other description):

For the purpose of: Protecting residential development within the **Town of South Fork,** Colorado; San Luis Resource Management Plan (decision LUA 1-2).

An exception to this stipulation may be approved if it can be demonstrated to the satisfaction of the Authorized Officer that operations can be conducted without causing unacceptable impacts to the residential values.

This stipulation may be waived by the Authorized Officer only upon determination that residential development no longer exists within the lease.

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 Manual 1624 and 3101 or FS Manual 1950 and 2820.)

Form #/Date

Serial No._____

NO SURFACE OCCUPANCY STIPULATION

No surface occupancy or use is allowed on the lands described below (legal subdivision or other description):

For the purpose of: Protecting recreational and visual resource values within the **Cumbres and Toltec ACEC**; San Luis Resource Management Plan (decision LUA 10-3).

An exception to this stipulation may be approved if it can be demonstrated to the satisfaction of the Authorized Officer that operations can be screened from scenic viewsheds and drill rig and other equipment noises can be eliminated.

No waiver criteria.

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 Manual 1624 and 3101 or FS Manual 1950 and 2820.)

Form #/Date

NO SURFACE OCCUPANCY STIPULATION

No surface occupancy or use is allowed on the lands described below (legal subdivision or other description):

For the purpose of: Protecting cultural resource values within the **200-acre Folsom Site, within the Sand Castle ACEC**; San Luis Resource Management Plan (decision LUA 3-4).

No exception nor waiver criteria.

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 Manual 1624 and 3101 or FS Manual 1950 and 2820.)

Form #/Date

Serial No.

NO SURFACE OCCUPANCY STIPULATION

No surface occupancy or use is allowed on the lands described below (legal subdivision or other description):

For the purpose of: Protecting the historic and cultural values within the **La Garita Wagon Ruts (5-SH-1065), Poncha Pass Railline (5-SH-1063), Villa Grove-Orient Railroad Bed (5-SH-1053), Ute Pass Road (5-SH-1066), and King Turquoise Mine (5-CN-650) sites** listed on the National Register of Historic Places; San Luis Resource Management Plan (decision LUA 1-2).

No exception nor waiver criteria.

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 Manual 1624 and 3101 or FS Manual 1950 and 2820.)

Form #/Date

APPENDIX D
LIVESTOCK GRAZING MANAGEMENT

APPENDIX D
LIVESTOCK GRAZING MANAGEMENT

The basic types of current or future grazing management systems and treatments to be used to meet management objectives are described below:

Deferred Grazing: Probably would involve one pasture; grazing would be deferred until after seed ripe of key plant(s).

Deferred Rotation: Would involve two or more pastures and livestock grazing would be deferred in one of the pastures successively until after seed ripe of key plant(s).

Rest Rotation: Would involve one or more pastures and provide rest for at least an entire year from livestock grazing successively in one or more of the pastures. Depending on the season of use and number of pastures, it would also involve delaying livestock grazing until after seed in one of the pastures then grazing to allow seed trampling with the rest treatment following this treatment.

Deferred Rest Rotation: Would involve rest from livestock grazing for at least 1 year but beginning of grazing occurs after seed ripe.

Holistic Resource Management (HRM): Would involve stressing holism in the management of the total resources as opposed to management for individual resources. The concept of time management, as opposed to animal numbers, would be used to control overgrazing, overrest, and other plant, soil, and animal relationships. HRM provides a model that outlines goal setting, and identifies ecosystem blocks that need to be addressed to attain goals, tools available for dealing with ecosystems, and testing and management guidelines for selecting the tools. HRM involves constant planning, monitoring, replanning, controlling, and testing. This management approach would only be allowed if total commitment for the program is obtained from the permittee.

Season of Use or Class of Livestock: This would involve restrictions, if necessary, to avoid livestock-wildlife competition on crucial big game ranges.

Range Improvements: Would be used if necessary to facilitate implementation of intensive management of grazing. General types of improvements would include boundary and/or pasture fences, cattleguards, pipelines, wells, water storage tanks, rainfall catchment reservoirs, springs, and water troughs. The general locations and numbers of range improvements would be identified in the individual AMPs.

Table D-1 provides an allotment-specific summary of the livestock management program. The following changes have been made to the table since the draft RMP was published.

1. A review of the management category of the allotments was completed in February of 1990 and as a result several allotments were recategorized. The standard criteria in BLM Manual 1622 appendix 1 was used for recategorization of the following allotments:

ALLOTMENT NO./NAME		NEW MANAGEMENT CATEGORY
4102	Lakes	M
4103	Dry Lakes	M
4113	Blanca WHA	M
4227	La Jara Creek	M
4239	San Antonio	M
4243	River	M
4244	South Valley	M
4304	Bowen	M
4305	Sanderson	M
4307	Alder Creek	M
4518	Nye	M
4558	East Hoagland Hill	I
4562	Mitchell	M
4563	West Tracy Ridge	M

2. The season of use on some allotments has changed to include some spring use as a result of requests by both BLM and permittees. The impacts of spring use was analyzed in an environmental assessment document. The following season of use to include spring use was changed on the following allotments:

4101	Rio Grande	4550	Rabbit Canyon
4201	McMahon	4240	Alta Lake
4213	Garambuyo	4410	Triangle
4214	Trujillo	4411	Gato-Hutchinson
4235	Railroad	4412	Greenie Mountain

3. Two allotments (Middle Creek No. 4543 and Indian Creek No. 4544) were dropped because of loss of qualifications by permittees. Middle Creek allotment has been incorporated into Poison Creek allotment No. 4541, and the acres in the table for this allotment have been changed to reflect this. Two allotments (Emperius No. 4111 and La Garita Creek No. 4573) were added to the table. Temporary grazing is allowed pending completion of allotment management plans.

Following is an explanation of the data presented in Table D-1:

(1) Management category is the general management objective for each allotment. I = generally most will be managed with the objective of improving resource conditions; M = generally will be managed with the objective of maintaining resource conditions; and C = generally will receive custodial management for existing resource values.

(2) Active grazing preference is that portion of the total grazing preference in AUMs available to be licensed for use during any one grazing year.

(3) Voluntary nonuse/suspended grazing preference is that portion of the total grazing preference in AUMs temporarily withheld from active grazing use.

(4) Total grazing preference is the total number of livestock grazing AUMs on public lands apportioned and attached to base property owned or controlled by a permittee or lessee. Column (2) plus column (3) equals column (4).

(5) Class of livestock is the kind of livestock authorized to graze on an allotment. C = cattle; S = sheep; H = horses.

(6) Season of use is the time of year when livestock are present on the allotment. Sp = spring (5/1 to 6/15); Su = summer (6/16 to 9/15); Fa = fall (9/16 to 12/15); Wi = winter (12/16 to 2/28). Early spring use (3/1 to 4/30) could be allowed for special management prescriptions.

(7) Implementation status is the current status of the allotment management plan (AMP). IMP = Implemented working AMP; NOT = Scheduled AMP that has not been implemented; GS = Allotment with grazing system only; A dash (-) = No AMP is scheduled for the allotment.

(8) Trend is the direction of change in range condition over a period of time. Data shown is based on trend studies completed for the San Luis Resource Area Grazing EIS, which was published in 1978. An asterisk (*) indicates no data available; U = Upward trend; S = Static trend; D = Downward trend.

TABLE D-1

Summary of Livestock Management Program by Allotment

Allotment No	Identification Name	Acres of Public Lands	Number of Operators in Allotment	Management Category	Grazing Preference: Active	Grazing Preference: Voluntary Nonuse/ Suspended	Grazing Preference: Total	Class Of Livestock	Season Of Use	Implementation Status	Trend
				(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
4101	Rio Grande	2,940	2	C	92	0	92	C	Sp,Fa	-	*
4102	Lakes	2,160	1	M	36	36	72	C	Su	NOT	S
4103	Dry Lakes	3,680	1	M	103	238	341	C	Su	NOT	S
4105	Allotment A	160	1	C	6	0	6	C	Su	-	*
4107	Foothills	4,700	1	I	260	0	260	C	Sp,Su,Fa	IMP	U
4108	Dow Pasture	480	1	C	15	0	15	C	Su	-	*
4109	Phiffer Pasture	160	1	C	5	0	5	C	Su	-	*
4110	Spring Creek Pasture	600	1	C	10	0	10	C	Su	-	*
4111	Sand Pasture	300	1	C	10	0	10	C	Su	-	*
4112	Crow Pasture	960	1	C	40	122	162	C	Su	-	*
4113	Blanca WHA	4,680	1	M	0	257	257	C	Sp,Su,Fa	IMP	U
4114	Emperius	2,017	1	I	340	0	340	C	Sp,Su,Fa	-	S
4115	Caldwell Pasture	200	1	C	11	34	45	C	Su	-	*
4117	Tobin Creek	6,128	1	I	236	194	430	H	Sp,Fa,Wi	IMP	U
4120	Pinon	3,145	1	M	123	83	206	C	Sp,Fa	-	S
4122	Phoneline	1,444	1	M	123	83	206	C	Su	GS	U
4123	Windmill	2,481	1	M	101	68	169	C	Su	GS	U
4125	Big East	1,440	1	C	40	27	67	C	Su	-	*
4126	Sand Dunes	400	1	C	15	0	15	C	Su	-	*
4201	McMahon	15,518	1	I	1,286	23	1,309	S	Sp,Fa,Wi	IMP	S
4202	Alamosa River	760	1	C	40	0	40	S	Fa	-	*
4206	PosoCreek	510	1	C	38	0	38	S	Fa,Wi	-	S

Table D-1 Continued

Allotment No.	Identification Name	Acres Of Public Land	Number of Operators in Allotment	Management Category	Grazing Preference: Active	Grazing Preference: Voluntary Nonuse/ Suspended	Grazing Preference: Total	Class of Livestock	Season of Use	Implementation Status	Trend
				(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
4207	Capulin	3,992	1	I	376	450	826	S	Fa,Wi	NOT	S
4209	Arroyo	1,920	1	I	178	0	178	S	Fa,Wi	NOT	S
4210	Crossroads	4,158	1	I	366	114	490	S	Fa,Wi	NOT	S
4212	Ciscom Flat	3,680	1	I	191	138	329	C	Su	IMP	U
4213	Garambuyo	7,698,	1	I	582	113	695	S	Sp,Fa,Wi	NOT	S
4214	Trujillo	5,168	1	I	425	116	541	S	Sp,Fa,Wi	NOT	S
4216	Jadero Flat	5,200	1	I	322	53	375	S	Wi	IMP	U
4219	Romero Canyon	1,761	1	I	125	214	339	C	Su	IMP	S
4220	RaJadero Canyon	6,533	3	I	617	174	791	C&S	Su,Fa	NOT	S
4222	Little Mogotes	13,803	4	I	1,202	102	1,304	C&S	Sp,Fa,Wi	IMP	U
4224	Poso	5,144	1	I	200	115	315	C	Sp,Fa,Wi	IMP	U
4225	Mogote Flat	1,977	1	I	206	0	206	C	Su	IMP	S
4226	Grande-Mogote	5,232	1	I	522	269	791	C	Sp,Fa	IMP	S
4227	La Jara Creek	600	1	M	31	19	50	C	Su	IMP	U
4229	Los Mogotes	5,721	2	I	397	265	662	C	Su	IMP	U
4230	Fox Creek	381	1	C	27	5	32	S	Sp	-	*
4232	Las Mesitas	87	1	C	7	0	7	C	Sp,Fa	-	*
4234	Bighorn Creek	760	1	I	90	20	110	C	Fa	IMP	U
4235	Railroad	3,841	1	I	172	296	468	S	Sp,Fa,Wi	IMP	S
4236	Llano	5,255	2	I	150	507	657	S	Sp,Fa, Wi	IMP	U
4237	Twin Lakes Ind. 1	240	1	C	11	0	11	C	Sp,Fa	-	*
4238	Twin Lakes Ind. 2	528	1	C	37	7	44	C	Sp,Fa	-	*
4239	San Antonio	5,200	1	M	222	107	329	C	Sp,Fa	IMP	S
4240	Alta Lake	5,192	1	I	288	356	644	C	Sp,Fa,Wi	IMP	S
4241	South Hills	1,323	1	C	65	11	76	S	Fa	-	*

Table D-1 Continued

Allotment No.	Identification Name	Acres Of Public Land	Number of Operators in Allotment	Management Category	Grazing Preference: Active	Voluntary Nonuse/ Suspended	Total	Class of Livestock	Season of Use	Implementation Status	Trend
				(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
4242	Twin Lakes	7,562	1	I	616	242	858	C	Wi	IMP	U
4243	River	2,560	1	M	200	190	390	C	Fa,Wi	-	S
4244	South Valley	1,945	1	M	136	157	293	C	Fa	-	S
4245	Pinon	5,440	1	I	292	107	399	C	Sp,Fa	IMP	S
4247	Braiden-North	640	1	C	40	80	120	C	Fa	-	*
4248	Kiowa Hill	4,302	1	I	209	177	386	C	Sp,Fa,Wi	IMP	U
4249	Pinon Hills	9,272	1	I	500	557	1,057	S	Fa,Wi	NOT	S
4250	Eight Mile	5,640	1	I	212	108	320	C	Sp,Wi	IMP	S
4251	Mesa Common	4,976	1	I	263	174	437	S	Fa,Wi	IMP	U
4252	San Luis Hills	2,542	1	I	110	0	110	S	Fa,Wi	IMP	U
4253	Flat Top	7,440	2	I	348	78	426	S	Fa,Wi	IMP	U
4255	La Sauses	3,280	1	I	139	156	295	C	Sp,Su	NOT	S
4256	East Bend	2,760	1	I	149	0	149	S	Sp,Wi	IMP	S
4257	Braiden-South	320	1	C	20	40	60	C	Fa	-	*
4258	Del Rancho	200	1	C	11	0	11	C	Sa	-	*
4259	Chicago Bogs	320	1	C	55	28	83	C	Su	-	*
4303	Schrader Creek	64	1	C	42	11	53	C	Sp	GS	*
4304	Bowen	48	1	M	21	65	86	C	Fa	IMP	U
4305	Sanderson	510	1	M	32	0	32	C	Sp	IMP	U
4307	Alder Creek	275	1	M	20	20	40	C	Sp,Fa	IMP	S
4309	County Line	200	1	C	18	0	18	S	Fa,Wi	-	*
4310	Indian Head	400	1	C	18	0	18	S	Fa,Wi	-	*
4312	Bachelor Lake	320	1	C	24	16	40	C	Su	-	*
4315	Dry Gulch	690	1	I	79	0	79	C	Su	NOT	S

Table D-1 Continued

Allotment No.	Identification Name	Acres Of Public Land	Number of Operators in Allotment	Management Category	Grazing Preference: Active	Voluntary Nonuse/ Suspended	Total	Class of Livestock	Season of Use	Implementation Status	Trend
				(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
4316	San Isabel	820	1	C	60	0	60	C	Su	-	*
4317	Rito Alto	740	1	C	45	0	45	C	Su	-	*
4319	Alamosa Prairie	320	1	C	16	0	16	S	Sp,Fa	-	*
4320	Ox Bow	82	1	C	8	45	53	C	Su	-	*
4401	Limekiln	5,050	1	I	373	17	390	S	Fa,Wi	IMP	U
4402	Pup Peak	5,002	2	I	406	0	406	S	Fa,Wi	IMP	U
4403	Nicomodes	2,240	1	I	200	0	200	S	Fa	NOT	S
4404	Refuge	1,080	1	I	92	0	92	S	Sp	NOT	S
4405	Raton Creek	3,940	1	I	274	112	386	C	Fa	NOT	S
4406	Rock Creek	12,171	1	I	1,147	1,853	3,000	S	Fa,Wi	NOT	S
4410	Triangle	3,715	1	I	315	264	579	S	Sp,Fa,Wi	IMP	U
4411	Gato-Hutchinson	1,960	1	I	228	92	320	S	Sp,Fa,Wi	IMP	U
4412	Greenie Mountain	7,954	1	I	588	132	720	S	Sp,Fa,Wi	NOT	S
4501	Poncha Pass-West	1,925	1	I	205	532	737	C	Su	IMP	S
4502	West Clover Creek	170	1	I	45	30	75	C	Su	IMP	U
4503	Clover Creek	82	1	C	7	0	7	C	Su	-	*
4504	Round Hill	267	1	C	12	0	12	C	Su	-	*
4505	Poncha Pass East	1,550	1	I	286	143	429	C	Su	IMP	U
4506	East Side	10,381	1	I	1,213	0	1,213	C	Su	IMP	U
4507	San Luis Creek 1	10	1	C	6	0	6	C	Fa	-	*
4508	Alder Creek	279	1	C	58	0	58	C	Su	-	*
4509	Spring Creek	1,070	1	C	74	0	74	-	Su	-	*
4510	Turquoise Gulch	3,806	1	I	559	0	559	C	Sp,Su	IMP	S
4511	San Luis Creek 2	155	1	C	13	0	13	C	Fa	-	*
4513	Kelly Creek	6,699	2	I	543	68	611	C	Su	IMP	S
4514	Kerber Creek	4,500	1	I	274	421	695	C	Su	NOT	S

Table D-1 Continued

Allotment No	Identification Name	Acres of Public Land	Number of Operators in Allotment	Management Category	Grazing Preference: Active	Voluntary/ Nonuse Suspended	Total	Class of Livestock	Season of Use	Implementation Status	Trend
				(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
4516	South Kerber Creek	170	1	C	12	0	12	C	Su	-	*
4517	Noland Gulch	7,650	1	I	541	31	572	C	Su	IMP	U
4518	Nye	1,463	1	M	76	149	225	C	Su	-	*
4519	West of San Luis Crk	1,584	1	I	159	36	195	C	Su	NOT	S
4520	Silver Crk F. R.	80	1	C	8	0	8	C	Su	-	*
4521	Piney Creek	2,660	1	I	180	0	180	C	Su	NOT	S
4522	Steel Canyon	4,472	1	I	203	97	300	C	Su	NOT	U
4523	East of San Luis Crk	1,220	1	I	104	31	135	C	Su	NOT	S
4524	Mirage	2,275	1	I	191	234	425	C	Su	NOT	S
4527	Valley View Hot Spng	4,927	2	I	428	108	536	C	Su	IMP	U
4530	Cotton Creek	3,880	1	I	313	0	313	C	Su	IMP	S
4531	Stonehouse	3,869	1	I	390	135	525	C	Su	NOT	S
4532	Crow	2,143	1	I	203	0	203	C	Su	NOT	S
4533	Copper Butte	4,830	1	I	445	0	445	C	Su	NOT	S
4534	McIntyre Gulch	4,408	1	I	132	348	480	C	Fa	IMP	U
4535	Cottonwood	3,230	1	I	217	512	729	C	Fa	IMP	U
4536	Findley Gulch	11,345	2	I	486	507	993	C	Su	IMP	U
4540	Dry Gulch	4,261	1	I	303	0	303	C	Su	NOT	S
4541	Poison Gulch	13,826	1	I	734	177	911	C	Su	NOT	S
4542	Tuttle Creek	1,290	1	I	48	150	198	C	Su	IMP	U
4545	Cross Creek	6,637	2	I	300	371	671	C	Su,Fa	IMP	U
4546	Trickle Mountain	19,279	1	I	776	423	1,200	C	Su	NOT	S
4547	Sheep Creek	2,031	1	I	202	106	308	C	Fa	IMP	S
4548	Taylor Canyon	2,902	1	I	245	125	370	C	Fa	IMP	U

Table D-1 Continued

Allotment No.	Identification Name	Acres of Public Land	Numberes of Operators in Allotment	Grazing Preference: Management Category	Active	Voluntary Nonuse/ Suspended	Total	Class of Livestock	Season of Use	Implementation Status	Trenc
				(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
4549	Meadow Fenced F.R.	97	1	C	25	0	25	C	Su	-	*
4550	Rabbit Canyon	3,865	1	I	290	0	290	C	Sp,Fa	IMP	S
4551	Saguache Park	1,920	1	I	119	0	119	C	Su	IMP	S
4552	Hat Springs	5,069	1	I	327	0	327	C	Fa	IMP	U
4553	Flickinger Inc. F.R.	240	1	C	23	0	23	C	Su	-	*
4554	Rob Ranch	1,537	1	I	113	0	113	C	Fa	NOT	S
4555	Mesa	396	1	C	20	0	20	C	Fa	-	*
4556	Mill Creek	694	1	C	45	0	45	C	Fa	-	*
4557	Hoagland Hill	3,633	1	I	228	0	228	C	Su	IMP	S
4558	East Hoagland Hill	1,459	1	I	76	43	119	H	Sp,Su,Fa	NOT	S
4559	Ward Fenced Tracts	22	1	C	18	0	18	C	Su	-	*
4560	Laughlin Gulch	2,349	1	I	150	0	150	C	Su	NOT	S
4561	Higgins Springs	753	1	C	49	0	49	C	Su	-	*
4562	Mitchell	779	1	M	50	109	159	C	Fa	IMP	U
4563	West Tracy Ridge	925	1	M	42	36	78	C	Su,Fa	IMP	U
4564	Tracy Ridge	893	1	C	45	0	45	C	Su	-	*
4565	Tracy Canyon	1,596	1	I	99	34	133	C	Su	NOT	S
4566	Tracy Common	27,524	8	I	2,841	943	3,784	C&S	Su,Fa	NOT	S
4567	Biedell	2,422	1	I	172	0	172	C	Su	IMP	U
4568	East Carnero Creek	10,796	1	I	302	329	631	C&S	Su,Fa	NOT	S
4569	Upper Coolbroth	1,780	1	I	75	44	119	C	Su	IMP	S
4570	Lower Coolbroth	625	1	I	29	12	41	C	Su	IMP	S
4572	La Garita	1,082	1	I	73	71	144	S	Fa,Wi	NOT	S
4573	La Garita Creek	1,375	1	I	200	0	200	C&S	Sp,Su,Fa	NOT	U
4574	Rio Grande Canal	4,360	1	I	225	75	300	S	Fa,Wi	IMP	U
4577	Hellgate	900	1	C	17	0	17	C	Su	-	*

ACRONYMS

ACEC--Areas of critical environmental concern
ATV--All terrain vehicle
AMP--Allotment management plan
ARPA--Archaeological Resources Protection Act
AUM--Animal unit month
BLM--Bureau of Land Management
CFL--Commercial forest land
CFR--Code of Federal Regulations
CRMAP--Coordinated resource management activity plan
CRMP--Cultural resource management plan
CNAP--Colorado Natural Areas Program
DOW--Division of Wildlife
DRMP--Draft resource management plan
EA--Environmental assessment
EIS--Environmental impact statement
ESA--Economic study area
EPA--Environmental Protection Agency
FEIS--Final environmental impact statement
FERC--Federal Energy Regulatory Commission
FLPMA--Federal Land Policy Management Act
FMP--Forest management plan
FR--Federal Register
GRA--Geographic Reference Area
HMP--Habitat management plan
IMP--Interim Management Policy
LUA--Land use allocation
MA--Management action
MFP--Management framework plan
NEPA--National Environmental Protection Act
NRHP--National Register of Historic Places
NSO--No surface occupancy
OHV--Off-highway vehicle
RCO--Resource condition objective
PRMP--Proposed resource management plan
R&PP--Recreation and Public Purposes
RMP--Resource management plan
ROD--Record of decision
ROS--Recreation opportunity spectrum
SLRA--San Luis Resource Area
SLRMP--San Luis Resource Management Plan
SPG--Supplemental program guidance
SPNM--Semiprimitive nonmotorized
SRMA--Special recreation management area
USFS--United States Forest Service
USFWS--United States Fish and Wildlife Service
VRM--Visual resource management
WHA--Wildlife habitat area
W&SR--Wild and scenic river
wtp--Willingness to pay

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GLOSSARY

Allotment Management Plan. A concisely written program of livestock grazing management, including supportive measures, if required, designed to attain specific management goals in a grazing allotment.

Acre-Foot. A unit for measuring volume, equal to the quantity of water or other material required to cover 1 acre to a depth of 1 foot or a volume of 43,560 cubic feet.

Alluvium. Unconsolidated rock or soil material deposited by running water, including gravel, sand, silt, clay, and various mixtures of these.

Allotment Management Action. A specific action stated within an allotment management plan.

Animal Unit Month (AUM). The forage needed to support one cow, one horse, or five sheep for a month or one elk, five deer, or five antelope for the same period of time (1,800 lbs./AUM on a 50 percent utilization basis).

Area of Critical Environmental Concern (ACEC). An area within the public lands where special management attention is required: (1) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes; or (2) to protect life and safety from natural hazards.

Avoidance. A partial or complete redesign or relocation of a proposed land use to prevent a potential adverse effect from occurring.

Back-Country Vehicle. Any motorized vehicle for cross-country travel over land, water, sand, snow, ice, marsh, swampland, or other terrain.

Biological Perpetuation. Management of aquatic habitat to achieve a healthy and productive ecosystem for the long-term enhancement of cold and warm water fisheries.

BLM Land. Land administered by the Bureau of Land Management.

Canopy. The continuous cover of branches and foliage formed collectively by the crowns of adjacent trees and other woody growth.

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.

Coordinated Resource Management Activity Plan (CRMAP). 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 Winter Range Closure. Lands identified as critical to big game during winter months (December 15 through March 31).

Cultural Resources. Those fragile and nonrenewable 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.

Discharged Use. A category applied to a cultural resource that was previously qualified for assignment to another category and no longer possess the qualifying characteristics.

Exception. Case-by-case exemption from a lease stipulation. The stipulation continues to apply to all other sites within the leasehold to which the restrict criteria applies.

Ecosystem. Collectively, all populations in a community, plus the associated environmental factors.

Endangered Species. Any species in danger of extinction throughout all or a significant portion of its ranges.

Environmental Assessment (EA). A report analyzing the impacts of some proposed action on a given environment. It is similar to an environmental impact statement (EIS) except it is generally smaller in scope and makes recommendations for action. EAs are sometimes preliminary to EISs.

Eolian. Pertaining to, caused by, or carried by the wind.

Ephemeral Stream. A stream that flows occasionally because of surface runoff, but is not influenced by permanent ground water.

Erosion. The process by which soil particles are detached and moved.

Flyway. An established air route of migratory birds.

Forb. A nonwoody herbaceous plant.

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.

Game Species. Those species commonly harvested either for sport or profit.

Geolographical Reference Area. A unit of specified land area, which is assigned a set of management directions within this land use plan.

Groundwater. Water beneath the land surface, in the zone of saturation.

Habitat. A specific set of physical conditions that surrounds the 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.

Habitat Management Plan (HMP). A written and approved activity plan for a geographical area of public lands identifying wildlife habitat management actions to be implemented in achieving specific objectives related to planning document decisions.

Hazard Sites/Areas. Locations on BLM-administered lands that potentially pose a hazard situation for the public or BLM personnel.

Hazardous Materials. Materials and substances that may be encountered on BLM-administered lands and would be potentially harmful if physical contact were made by either the public or BLM personnel.

Imprint. A mark or evidence left by man.

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 structure) that is generally considered out of context with the characteristic landscape.

Lease (fluid). A contract in legal form that provides for the right to develop and produce fluid resources for a specific period of time under certain agreed upon terms and conditions.

Leasable Minerals. Oil, gas, sodium, potassium, phosphate, coal, oil shale, tar sands, asphaltic materials, and, in Louisiana and New Mexico, sulphur and all minerals on the Outer Continental Shelf, and on acquired lands.

Locatable Minerals. Minerals or materials subject to disposal and development through 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.

Management Framework Plan (MFP). Land use plan for BLM-administered lands, which provides a set of goals, objectives, and constraints for a specific planning area to guide the development of detailed plans for the management of each resource.

Mbf. Thousand board feet.

MSA. See Management Situation Analysis.

Management Situation Analysis (MSA). An analysis by the Bureau of Land Management used for making land management decisions that are responsive to public issues to determine the capability of public land resources. This is available for review in the Cañon City District Office.

Management Use. The category applied to any cultural property considered most useful for controlled experimental study that would result in its physical alteration.

Mineral Estate. The ownership of the right to all or certain minerals in the land, or reservation of fractional interest in all or certain minerals in perpetuity or for a specified period of time.

Mineral Material. Widespread deposits of common clay, sand, gravel, or stone, which are not subject to disposal under the 1872 Mining Law, as amended.

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 applies.

National Register of Historic Places. The official list, established by the *National Historic Preservation Act* of 1966, of the nation's cultural resources worthy of preservation. The register lists archaeological, historic, and architectural properties (i.e., districts, sites, buildings, structures, and objects) nominated for their local, state, or national significance by state or Federal agencies and approved by the National Register staff.

No Surface Occupancy. A fluid mineral leasing stipulation that prohibits occupancy or disturbance of all or part of the lease surface in order to protect special values. Fluid resources may be developed by directional drilling.

Nongame Species. Those species not commonly harvested either for sport or profit.

Nonuse. Allowable livestock grazing use (in AUMs) that is authorized but is not to be used during a given time period. Nonuse is applied for and authorized on an annual basis.

Off-Highway Vehicle (OHV). This designation replaces the off-road vehicle (ORV) designation and is all inclusive of unsurfaced roads. This designation aids in management of seasonal closures on all unsurfaced roads needing protection during wet seasons or for protection of other resources or values.

OHV Open Areas. Locations on BLM-administered lands with no limitations nor restrictions to full use and travel of off-highway vehicles.

OHV Limited Areas. Locations on BLM-administered lands with some form of limitation or restriction for the full use and travel of off-highway vehicles (i.e., seasonally limited travel or restrictions of travel to designated roads and trails only).

OHV Closed Areas. Locations on BLM-administered lands where absolutely no use nor travel of off-highway vehicles is allows.

Perennial Stream. A stream that has year-round surface flows.

Permeability. The condition of being porous; containing openings or interstices through which outside properties can pass.

Public Use. The category applied to any cultural property that is appropriate for consideration as an interpretive exhibit in place.

Range Condition or Ecological Status. Present state of vegetation of a range site in relation to the potential natural community (climax). Range condition and ecological status are synonymous and can be expressed by either seral stage or condition class. Four classes express the degree to which production or composition the present community reflects the percent of the potential natural community (climax).

Potential Natural Community (PNC). Excellent condition has 76 to 100 percent of the vegetation at climax.

Late Seral. Good condition has 51 to 75 percent of the vegetation at climax

Mid Seral. Fair condition has 26 to 50 percent of the vetegation at climax.

Early Seral. Poor condition has 0 to 25 percent of the vegetagion at climax.

Raptors. Birds of prey, such as hawks, owls, and eagles. One of the behavior characteristics of these animals is to return, year after year, to the same nesting area. Accordingly, the nesting sites of these protected species should be retained with minimal human disturbance.

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.

Reforestation Problems. Problem sites where two or more types of interfering conditions may cause seedling mortality during the first several growing seasons. High soil temperature, droughty conditions, unshaded southern and western slopes, competing vegetation, animal damage, or wind and frost damage are examples of such conditions.

Right-of-Way (major). An area open for a utility line greater than 69 kilowatts or a surface-disturbing activity that is greater than 5 feet in width.

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 right-of-way grants and suitable to accommodate more than one type of right-of-way or one or more rights-of-way that are similar, identical, or compatible.

Riparian Area. An area of land directly influenced by permanent water, which has visible vegetation or physical characteristics reflective of this permanent water influence.

Riprap. A loose assemblage of broken rock erected in water or on soft ground as a foundation.

Riverine. Pertaining to or resembling a river. Located on or inhabiting the banks of a river (i.e., riparian).

Salable 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.

San Luis Planning Area Boundary. The portion within the area boundary identified for study in the resource management plan; i.e. excludes most of Mineral County and most of the U.S. Forest Service lands.

San Luis Resource Area Boundary. BLM designated boundary; i.e., all of Alamosa, Conejos, Costilla, Mineral, Rio Grande, and Saguache Counties.

Scientific Use. The category applied to any cultural property determined suitable for consideration as the subject of scientific or historical study utilizing currently available research techniques, including study that would result in physical alteration of the property.

Sediment Yield. The amount of sediment given up by a watershed over a specified time period, usually a year. Ordinarily, it is expressed as tons, acre-feet, or cubic yards of sediment per unit of drainage per year.

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 because the scale of the map or the purpose for which it is being made does not require delineation of the individual soils.

Solitude. The state of being alone or remote from habitations; isolations. A lonely, unfrequented, or secluded place.

Special Recreation Management Area (SRMA). Areas requiring explicit recreation management to achieve the Bureau recreation objectives and to provide specific recreation opportunities. Special management areas are identified in the RMP, which also defines the management objectives for the area. BLM recreation investments are concentrated in these areas.

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.

Split Estate. Lands where the surface and mineral estates have been severed and are under different ownership (i.e., private surface/Federal minerals).

Sustained Yield. The achievement and maintenance, in perpetuity, of a high level of annual or regular periodic output of the various renewable resources of the public lands consistent with multiple use. Amount of resource harvested normally equals the amount grown since the previous harvest.

Supplemental Program Guidance (SPG). Program specific guidance for resource management planning from the 1620 series of the BLM manual.

Threatened Species. Any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

Vista. A panoramic scenic view from one or more vantage points.

Glossary (Continued)

Visual Resource. The land, water, vegetation, animal, and other features that are visible on all lands.

Waiver. Permanent exemption from a lease stipulation. The stipulation no longer applies anywhere within the leasehold.

Wetlands. Permanently wet or intermittently flooded areas where the water table (fresh, saline, or brackish) is at, near, or above the soil surface for extended intervals, where hydric wet soil conditions are normally exhibited and where water depths generally do not exceed two meters.

Wilderness Study Area (WSA). A roadless area, which has been found to have wilderness characteristics (thus having the potential of being included in the National Wilderness System), and which has been subjected to intensive analysis by the Bureau and public review to determine wilderness suitability and is not yet the subject of a congressional decision regarding designation as wilderness.

Withdrawal. An action that restricts the use of public land and segregates the land from the operation of some or all of the public land or mineral laws. Withdrawals are also used to transfer jurisdiction of management to other Federal agencies.

Woodland. Forested land not capable of producing commercial sawtimber, but can and does produce forest products like firewood, transplants, posts and poles, etc.

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