US Department of the Interior

Bureau of Land Management
Glenwood Springs and Kremmling Field Offices, Colorado August 2007

Glenwood Springs and Kremmling Resource Management Plan Revisions

Scoping Summary Report

EXECUTIVE SUMMARY

The United States Department of the Interior, Bureau of Land Management (BLM) is preparing a Resource Management Plan (RMP) for public lands administered by the Glenwood Springs Field Office (GSFO) and Kremmling Field Office (KFO) in Colorado. The RMP will replace the GSFO RMP and the KFO RMP, each completed in 1984, and subsequent amendments through 2004. All lands within the two field offices are encompassed in this planning effort with the exception of the Roan Plateau area administered by the GSFO. A separate RMP is being conducted for that area. However, river segments within the Roan Plateau area will be included in the Wild and Scenic River Suitability Study that is a part of this joint GSFO and KFO RMP.

Objectives of Scoping

- Invite agencies and public to participate;
- Identify a preliminary list of environmental and socioeconomic issues to address in the NEPA document; and
- Eliminate concerns or issues determined to be insignificant.

Public involvement is a vital component of an effective RMP process. Public involvement for the GSFO/KFO RMP includes public scoping and outreach; pre-planning outreach to local communities; collaboration with federal, state, local, and tribal governments and a Resource Advisory Council; and public review and comment on the draft RMP/EIS. This report documents the results of the public and agency scoping and outreach process.

PUBLIC SCOPING ACTIVITIES

The formal public scoping process for the GSFO/KFO RMP/EIS began on March 2, 2007, with the publication of the Notice of Intent (NOI) in the *Federal Register* (Appendix A) and continued for 60 days until it ended on May 2, 2007. This 60 day comment period exceeded the 30-day comment period required by the Council on Environmental Quality regulations.

BLM outreach efforts to date have included: 1) launching a public Web site, www.blm.gov/rmp/co/kfo-gsfo; 2) mailing postcards to more than 850 agency officials, organizations, and members of the public on March 27, 2007; 3)

disseminating a newsletter to over 1,050 agency officials, organizations, and members of the public on May 18, 2007; 3) advertising and hosting seven scoping open houses in April 2007 in Rifle, Granby, Carbondale, Kremmling, Gypsum, Walden, and Glendevey; and 4) publishing periodic newspaper advertisements and a news release.

PUBLIC SCOPING RESULTS

A total of 105 written submissions containing 766 separate comments were received.Comments were categorized, coded, entered into a database, tallied, and analyzed. Categories included planning issues, geographic location of the commentor, geographic area of concern, and affiliation of the commentor.

Individuals provided 68% of the total comments received during the GSFO/KFO RMP scoping period. Private organizations provided 14%. Businesses submitted 4% of the total. Elected officials and law firms each provided 3% of the total number of comments received for a combined total of 6%. Federal, state, and county governmental agencies each submitted 2%, for a total of 6%. Special districts provided 2% of the total number of comments received. No comments were received from municipalities or from tribal governments.

ISSUE SUMMARY

Based on internal and external scoping, the following 12 planning issues have been identified:

1. **Travel management and transportation—**How will transportation be managed to protect natural and cultural resources, to provide motorized and nonmotorized recreation opportunities, to reduce user conflicts, to enforce route designations and closures, and to improve public access?
2. **Recreational demand and uses—**How will recreation be managed to maintain and improve recreation sites and trails, especially in close proximity to communities, to reduce user conflicts, to protect natural and cultural resources, to provide a variety of recreational opportunities, and to maximize socioeconomic benefits?
3. **Lands and realty—**What opportunities exist to make adjustments to public land ownership that would result in greater management efficiency, in appropriate and agreeable levels of public access, and in increased public and natural resource benefits?
4. **Special designations—**Where are special designations appropriate to protect unique resources, and how should existing special designations be managed to protect the natural and cultural resources and maximize recreational opportunities and socioeconomic benefits?
5. **Urban interface—**How will BLM lands in urban interface areas be managed to provide desired benefits by the public and to be consistent with future land use plans in neighboring communities?
6. **Energy development—**Which areas should be open to energy development, particularly oil and gas leasing, and what restrictions should be

employed to protect cultural and natural resources and minimize user conflicts?

7. **Range health/upland management—**How will the BLM manage livestock grazing on public lands while protecting, managing, restoring, and using natural and cultural resources?
8. **Vegetation—**What actions or restrictions will be needed to reduce dangerous fuel loading, to control and prevent the spread of noxious weeds and other undesirable plant species, and to maintain healthy forest ecosystems?
9. **Wildlife—**How will uses and land management activities be managed to maintain and improve terrestrial and aquatic habitats in a scattered land ownership pattern, while maintaining multiple-use land management?
10. **Water/riparian—**What measures will be implemented to protect water resources, especially riparian areas, from the effects of other uses?
11. **Sagebrush habitat and species—**How will sagebrush habitat be managed to reduce continued habitat loss and fragmentation?
12. **Cultural resources—**How can the BLM protect and conserve cultural resources, and where do interpretation opportunities exist?

The BLM will use the planning issues to help guide the development of a reasonable range of alternative management strategies for the RMP. Most of the comments on planning issues focused on travel management (26%), recreation (24%), and lands and realty (11%). Special designations (8%), urban interface (7%), and energy development (7%) issues also received relatively large numbers of comments. In addition to planning issues, comments also addressed issues that are policy or administrative actions; issues that related to implementation actions; and issues that are outside the scope of the RMP.

FUTURE STEPS

Scoping is the first step in the public involvement process; however, the BLM will collect input from the public throughout the RMP process. Additional formal opportunities will occur for the public to become actively involved in the process. On a more informal basis, the public is encouraged to contact the BLM with any comments throughout the process.

The draft RMP/EIS has an anticipated publication date of 2008 and will be announced via a Notice of Availability in the *Federal Register* and local media. Public meetings will be held to solicit public comments. At the conclusion of the public comment period, the draft RMP/EIS will be revised and a Proposed RMP/Final EIS will be published and made available for public review.

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LIST OF ACRONYMS

Acronym	Definition
ACEC	Area of Critical Environmental Concern
ATV	all-terrain vehicle
BLM	United States Department of the Interior, Bureau of Land Management
CDOW	Colorado Division of Wildlife
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
EIS	environmental impact statement
EPA	Environmental Protection Agency
FLPMA	Federal Land Policy and Management Act
GSFO	Glenwood Springs Field Office
KFO	Kremmling Field Office
MFP	Management Framework Plan
NEPA	National Environmental Policy Act of 1969
NOI	Notice of Intent
OHV	off-highway vehicle
RAC	Resource Advisory Council
RMP	Resource Management Plan
SRMA	Special Recreation Management Area
WSA	Wilderness Study Area
WSR	Wild and Scenic River

SECTION 1
INTRODUCTION

The United States Department of the Interior, Bureau of Land Management (BLM) is preparing a Resource Management Plan (RMP) for public lands administered by the Glenwood Springs Field Office (GSFO) and the Kremmling Field Office (KFO) in Colorado. The RMP will replace the GSFO RMP and the KFO RMP, each completed in 1984, and their subsequent amendments through 2004. A separate RMP is being conducted for the Roan Plateau area, which lies within the GSFO. This portion of the planning area is not included in the BLM decision area for this RMP, with the exception of the Wild and Scenic Rivers (WSR) Suitability Study, which will include the Roan Plateau.

1.1 OVERVIEW OF THE NATIONAL ENVIRONMENTAL POLICY ACT AND PUBLIC INVOLVEMENT PROCESS

Under the National Environmental Policy Act (NEPA) of 1969 (Public Law 91-190) and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, federal agencies are required to consider the environmental impacts of their proposed actions beforehand. Actions that are subject to NEPA include those involving federal funding, requiring federal permits, involving federal facilities and equipment, or affecting federal employees. The actions that would be proposed by the BLM as part of the RMP being developed for the GSFO and KFO are subject to the requirements of NEPA. Pursuant to NEPA, the BLM will prepare an Environmental Impact Statement (EIS) for the GSFO and KFO RMP.

Public involvement is a vital component of the Federal Land Policy and Management Act (FLPMA) and NEPA, vesting the public in the decision making process and allowing for full environmental disclosure. Guidance for implementing public involvement is codified in 40 Code of Federal Regulations (CFR) Section 1506, Part 6 (40 CFR 1506.6), thereby ensuring that federal agencies make a diligent effort to involve the public in preparing NEPA documents.

Public involvement for the GS/KFO RMP is being conducted in four phases:

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

Objectives of Scoping

- Invite agencies and public to participate;
- Identify a preliminary list of environmental and socioeconomic issues to address in the NEPA document; and
- Identify and eliminate concerns or issues determined to be insignificant.

This report documents the results of the first three phases of the public involvement process.

Scoping is a process designed to determine the scope of issues and alternatives to be addressed in a NEPA document. The process has two components: internal scoping and external scoping. Internal scoping is conducted within an agency or cooperating agencies to determine preliminary and anticipated issues and concerns. In 2006 through early 2007, an interdisciplinary team of BLM resource specialists held internal scoping meetings to identify the anticipated planning issues and the methods, procedures, and data to be used in compiling the RMP/EIS. These were compiled into an internal RMP Pre-Plan Analysis. All of the issues identified in the internal scoping process were relevant to BLM management in the planning area.

External scoping is a public process designed to reach beyond the BLM and attempts to clarify the concerns of high importance to the public. The public process is designed to determine and frame the scope of pertinent issues and alternatives to be addressed in a NEPA document. External scoping helps ensure that real problems are identified early and that they are properly studied; that issues of no concern do not consume time and effort; and that the proposed action and alternatives are balanced, thorough, and able to be implemented.

In accordance with 43 CFR 1610.2(d), the BLM must document the scoping results. The BLM's land use planning guidance (Handbook H-1601-1) requires the preparation of a Scoping Summary Report to capture public input in one document. This report must summarize the separate comments received during the formal external scoping period. It also must describe the issues and management concerns from public scoping meetings, internal scoping meetings, and the pre-plan analysis and must include a discussion of how these comments will be incorporated into the RMP.

1.2 PURPOSE OF AND NEED FOR THE RESOURCE MANAGEMENT PLAN

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

The BLM developed and approved two RMPs for the area in 1984. Although the 1984 GSFO and KFO RMPs have been subsequently amended, some of the plans do not satisfactorily address new and emerging issues. Laws, regulations, policies, and issues regarding management of these public lands have changed during the lives of the plans. The BLM is developing a new RMP to ensure compliance with current mandates and to address current issues. If decisions in the 1984 RMPs are still valid, the BLM may bring them forward into the revised RMP. When completed, the revised RMP will replace the existing RMPs.

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

1.3 DESCRIPTION OF THE PLANNING AREA

The planning area is composed of the BLM, US Forest Service, National Park Service, and State of Colorado lands, private property, and the whole landscape (**Figures 1-1** through **1-3**). There are about six million acres in both planning areas combined. The decision area for the RMPs is composed of BLM lands only, which make up 20% of the GSFO planning area (568,064 acres) and 12% of the KFO planning area (378,491 acres). The GSFO extends across three Colorado counties: Eagle, Garfield, and Pitkin; the KFO spans five Colorado counties: Jackson, Grand, Larimer, Eagle, and Summit. A portion of the GSFO planning area (73,602 acres) managed by the BLM is covered under the separate Roan Plateau RMP Amendment. This segment of the planning area is not covered under this RMP/EIS, with the exception of the area being covered in the WSR Suitability Study.

1.4 DESCRIPTION OF THE SCOPING PROCESS

The BLM follows the public involvement requirements according to the CEQ regulations set forth in 40 CFR 1501.7, which states, "there should be an early and open process for determining the scope of issues to be addressed and for identifying

the process for determining the scope of issues to be addressed during the planning process." The BLM also follows public involvement requirements described in the Resource Management Planning Regulations 43 CFR 1610. The BLM solicits comments from relevant agencies and the public, organizes and analyzes all of the comments received, and then distills the comments to identify issues that will be addressed during the planning process. These issues are the scope of analysis for the RMP and are used to develop the project alternatives.

1.4.1 Notice of Intent

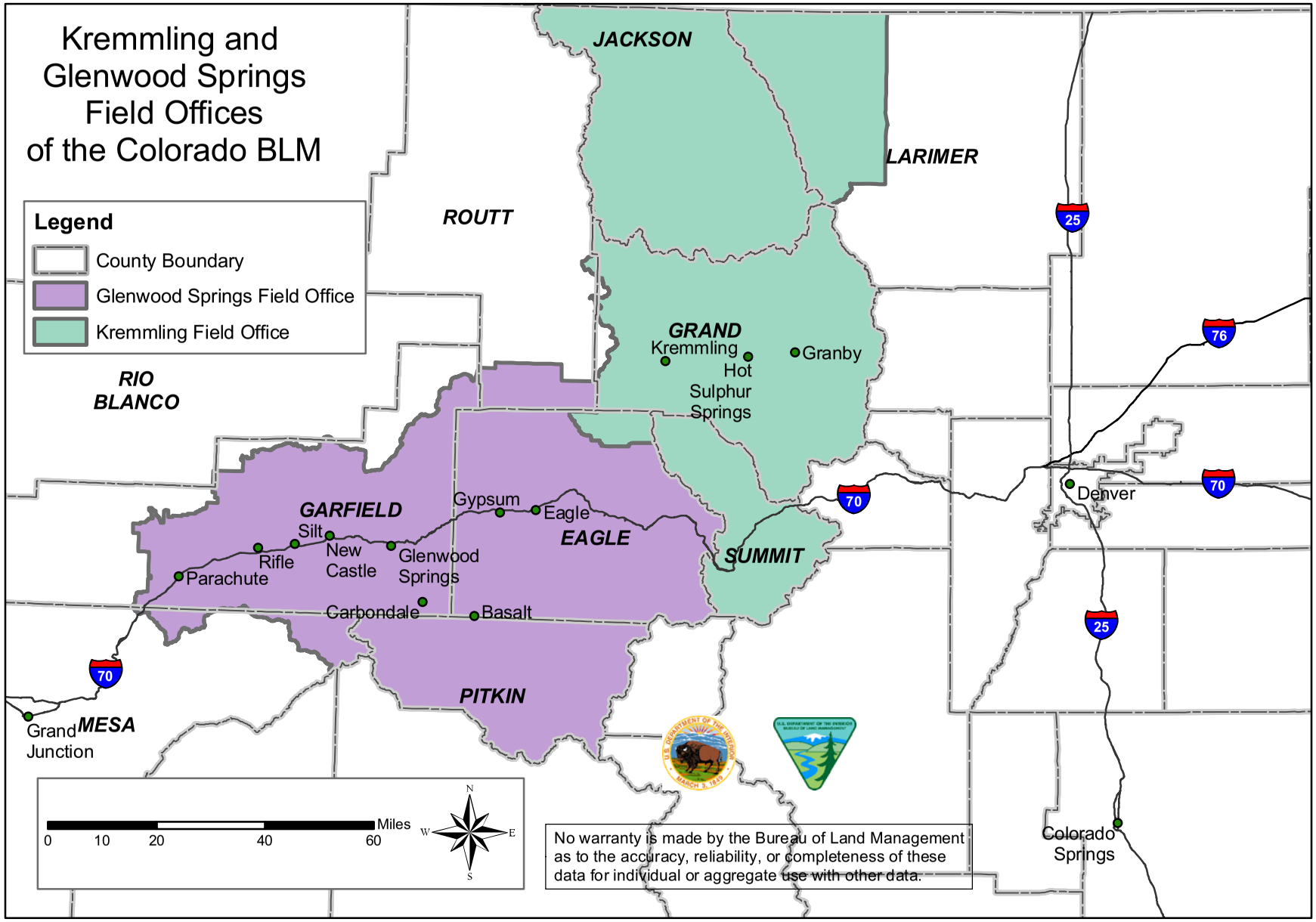
The formal public scoping process for the GSFO/KFO RMP/EIS began on March 2, 2007, with the publication of the Notice of Intent (NOI) in the *Federal Register*. A copy of the NOI is included in **Appendix A**, Notice of Intent. The NOI initiated the public scoping process and served to notify the public of the BLM's intent to develop an RMP for the GSFO/KFO. Under CEQ regulations, the public comment period must last for at least 30 days; however, the BLM extended this public comment period until May 2, 2007, providing 60 days. Although the formal comment period has ended, the BLM will continue to consider all comments received during the planning process. The NOI was provided for public consideration at the seven scoping open houses and was posted on the project Web site.

1.4.2 Project Web Site

In the winter of 2006, a GSFO/KFO RMP/EIS public Web site was launched to serve as a clearinghouse for project information during the planning process. The Web site, available on the Internet at http://www.blm.gov/rmp/co/kfo-gsfo, provided background information about the project, a public involvement timeline and calendar, maps and photos of the planning area, and copies of public information documents such as the NOI and newsletter. The site also provided a link to the comment form (**Appendix B**) for submitting comments about the project.

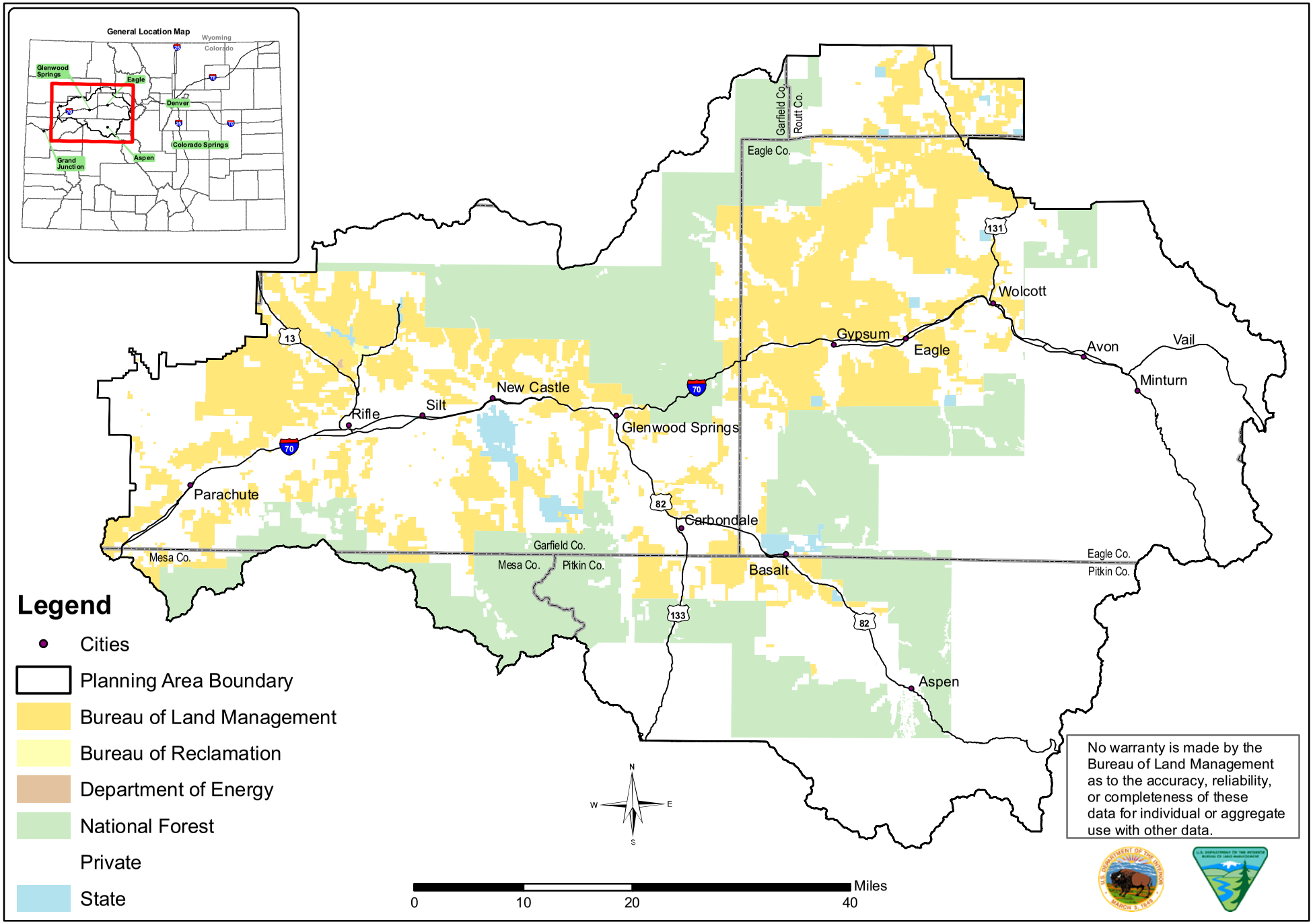
1.4.3 Postcard and Newsletter

On March 27, 2007, the BLM sent a postcard for the GSFO/KFO RMP project to more than 850 individuals from the public, agencies, and organizations. The postcard introduced the BLM and the RMP planning process and suggested methods for public involvement. The postcard also provided the dates and venues for six of the seven scoping open houses. A seventh open house was added later at the request of the public. The postcard gave the public various alternative methods to submit their comments, including a dedicated e-mail address (cormpkg@blm.gov) and the BLM KFO postal address to mail comments.



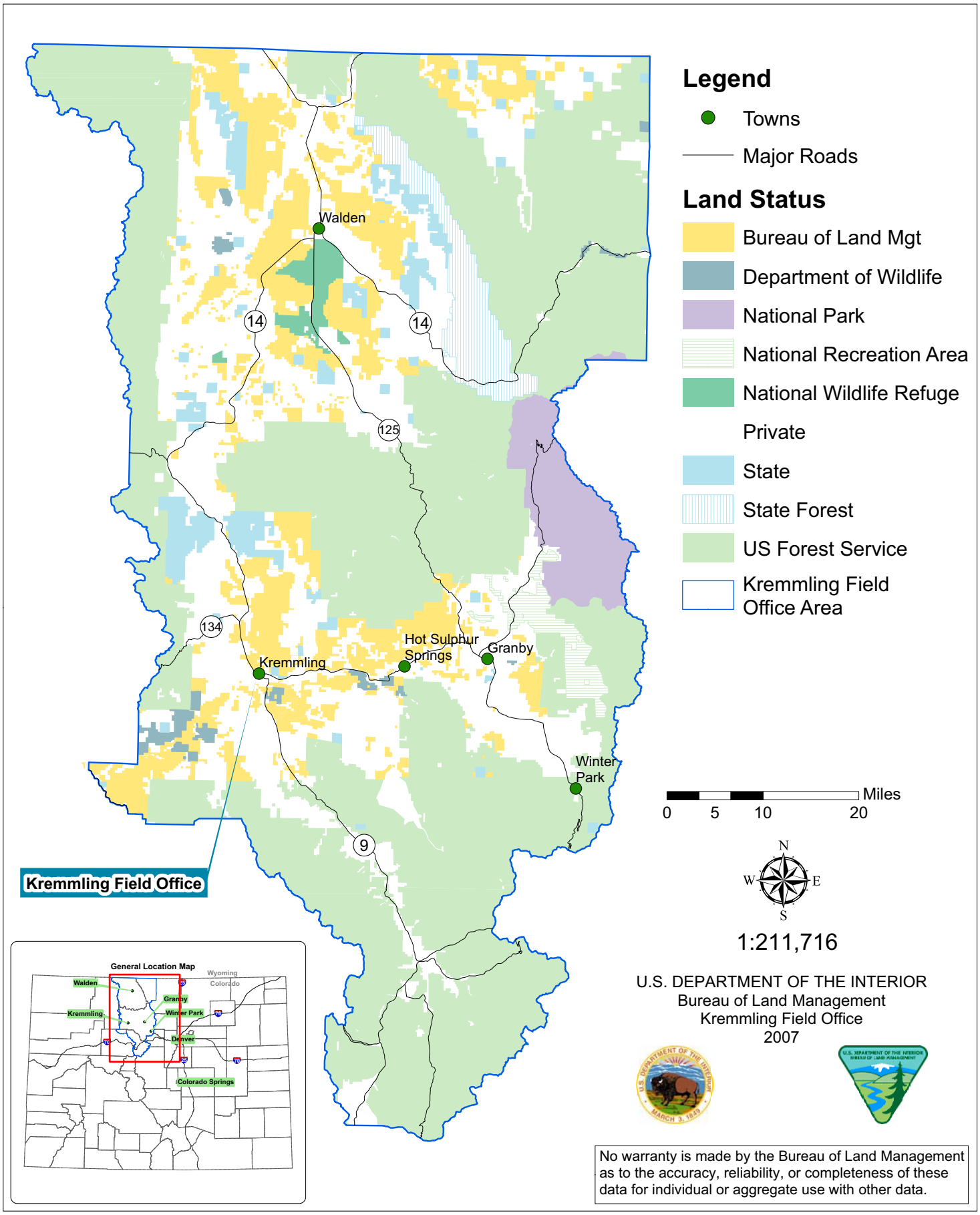
Project Planning Area

Figure 1-1



Glenwood Springs Field Office Planning Area

Figure 1-2



Kremmling Field Office Planning Area

Figure 1-3

Additionally, on May 18, 2007, the BLM sent a newsletter for the GSFO/KFO RMP project via e-mail and US mail to over 1,050 individuals from the public, agencies, and organizations. The newsletter summarized the scoping meetings, provided information on the trails and routes data collection workshops in June 2007 and gave overall information about the planning process. The trails and routes data collection workshops were separate from the scoping meetings and gave individuals, agencies, and organizations an opportunity to provide the BLM with data and missing information on existing trails and routes. (Information obtained at these workshops is not included in this scoping report.)

The BLM will publish future newsletters at major project milestones and will mail then to individuals and organizations that have requested to remain on or be added to the project distribution list. These newsletters also will be posted on the project Web site. Participants may request to receive newsletters through electronic mail.

1.4.4 News Release and Newspaper Advertisement

Advertisements were published in area newspapers to notify the public of the project, to announce six of the seven open houses, to solicit public comments, and to provide contact information. These newspapers and the publication dates are as follows:

- *The Daily Sentinel,* Grand Junction, Colorado (Sunday, April 1, 2007);
- *Jackson County Star,* Walden, Colorado (Thursday, April 5, 2007);
- *Middle Park Times,* Kremmling, Colorado (Tuesday, April 3, 2007);
- *Ski-Hi News,* Granby, Colorado (Thursday, April 5, 2007);
- *Post Independent,* Glenwood Springs, Colorado (Sunday, April 1, 2007);
- *Vail Daily,* Vail, Colorado (Sunday, April 1, 2007);
- *Summit Daily News,* Breckenridge, Colorado (Sunday, April 1, 2007); and
- *Aspen Times Daily,* Aspen, Colorado (Sunday, April 1, 2007).

A copy of the newspaper advertisement is in **Appendix C**, Newspaper Advertisements. A news release also was issued to various media points beginning on April 5, 2007.

1.4.5 Scoping Open Houses

The BLM hosted seven scoping open houses to further provide the public with opportunities to become involved, to learn about the project and planning process, to meet the RMP team members, and to offer comments. As described in Section 1.4.4, News Release and Newspaper Advertisement, the meetings were advertised in local media. Additionally, the postcard advertising the meetings was mailed to agency staff and members of the public who had participated in past BLM activities and had been included in past BLM distribution lists.

During the week of April 9, 2007, open houses were held in seven locations within the project planning area (**Table 1-1**, 2007 Open House Schedule and Attendance).

Table 1-1
2007 Open House Schedule and Attendance

Venue	Location	Date	Attendance
Rifle Fire Protection District–Station 1	Rifle	April 10	23
Granby Community Center	Granby	April 10	34
Town of Carbondale–Community Room 2	Carbondale	April 11	31
CSU Extension Hall	Kremmling	April 11	36
Town Hall–Council Chambers	Gypsum	April 12	11
Wattenberg Center	Walden	April 12	17
Larimer River Guest Ranch	Glendevey	April 25	25
Total			**177**

Note: All meetings were from 4:00 to 7:00 PM.

At this scoping phase of the planning process, an open house format was chosen over the more formal public meeting format to encourage broader participation, to allow attendees to learn about the project at their own pace, and to enable them to ask questions of BLM representatives in an informal one-on-one setting. A packet of fact sheets and handouts about the project and a map of the planning area were provided, as was a list of the anticipated planning issues and preliminary planning criteria related to the project. Single-page summaries of each resource issue were included as a convenient reference to take from the meetings. Site and resource maps were displayed illustrating the current situation and management techniques practiced among different resources and land areas. To encourage broad participation, the BLM chose prominent, handicapped-accessible local facilities in informal settings. These venues included three community centers and an extension hall, a town hall, and a fire station. In addition to BLM representatives, a total of 177 people attended the open houses.

1.4.6 Newspaper Articles

In addition to articles and notifications that the BLM has published regarding the RMP, over 20 articles and news bulletins regarding some aspect of the RMP process have been published in newspapers both within and outside the planning area. Numerous articles advertised the April 2007 public scoping meetings and the June 2007 travel management workshops. Others discussed the Wild and Scenic Rivers Suitability Study and management of the Thompson Creek Area of Critical Environmental Concern (ACEC). A few explained the RMP planning process, urged public participation, and explained methods to submit comments.

The articles appeared in 11 different newspapers between December 2006 and June 2007. Most of the newspapers have circulations that encompass the two field offices; however, two of the newspapers publish outside the planning area. The

newspapers include the Aspen Daily, Post Independent, Daily Sentinel, Vail Daily, Casper Star Tribune, Summit Daily News, Eagle Valley Enterprise, Aspen Times, Citizen Telegram, Daily Tribune and Seattle Post-Intelligencer. Examples of the type of articles that have been published are provided in **Appendix D**.

1.4.7 Mailing List

The BLM compiled a list of over 850 individuals, agencies, and organizations that have participated in past BLM projects or requested to be on the mailing list. Each of these individual listings was mailed the initial postcard (discussed in Section 1.4.3, Postcard and Newsletter). Recipients of the newsletter and visitors to the scoping open houses were asked to specifically request to stay on the official RMP project mailing list to receive future mailings. Several entries were deleted from the official GSFO/KFO RMP project mailing list due to duplications, changes of address, and return-to-sender mailings. Several new entries were added. Through this process, the mailing list was revised to approximately 1,050 entries. Requests to be added to or to remain on the official GSFO/KFO RMP distribution list will continue to be accepted throughout the planning process.

1.5 COLLABORATIVE INVOLVEMENT PROCESS

In addition to formal scoping, the BLM has implemented an extensive collaborative outreach and involvement process that has included a community assessment, coordinating with cooperating agencies, and working closely with the Resource Advisory Council. These efforts are summarized below. The BLM will continue to meet with interested agencies and organizations throughout the planning process, as appropriate, and will coordinate closely with their cooperative partners.

1.5.1 Community Assessment

The community assessment process began in the fall of 2006 when the BLM held 19 small group discussions with representatives from local governments in north-central Colorado. This pre-planning process gathered input from communities about their vision for the landscape and benefits they seek from public lands, identified strategic planning options, and laid the foundation for an on-going collaborative relationship with communities for the RMP effort. Results of this process were published in the *North-Central Colorado Community Assessment Report* (BLM 2007). This report is available for review on the RMP website and available from the BLM upon request.

1.5.2 Cooperating Agency Collaboration

A cooperating agency is any federal, state, or local government agency or Indian tribe that enters into a formal agreement with the lead federal agency to help develop an environmental analysis. More specifically, cooperating agencies "work with the BLM, sharing knowledge and resources, to achieve desired outcomes for public lands and communities within statutory and regulatory frameworks" (BLM Land Use Planning Handbook H-1601-1).

The benefits of enhanced collaboration among agencies in preparing NEPA analyses are as follows:

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

On November 29, 2006, the BLM wrote local, state, federal, and tribal representatives, inviting them to participate as cooperating agencies for the GSFO/KFO RMP. As of June 20, 2007, 20 agencies had agreed to participate in the RMP as a designated cooperating agency (**Table 1-2**).

Table 1-2
Cooperating Agency Participation (as of June 20, 2007)

Agency	Accepted	Declined	Did not Respond
Garfield County Board of County Commissioners	X		
Eagle County Board of County Commissioners	X		
Pitkin County Board of County Commissioners	X		
Routt County Board of County Commissioners		X	
Mesa County Board of County Commissioners	X		
Grand County Board of County Commissioners	X		
Jackson County Board of County Commissioners	X		
Summit County Board of County Commissioners			X
Larimer County Board of County Commissioners			X
Town of New Castle	X		
Town of Rifle	X		
Town of Parachute	X		
Town of Silt	X		
Town of Gypsum	X		
Town of Eagle	X		
City of Glenwood Springs	X		
Town of Carbondale	X		
Town of Basalt	X		
Town of Kremmling	X		
Town of Hot Sulfur Springs	X		
Town of Granby	X		
Town of Walden		X	
Colorado Department of Natural Resources	X		
USDA Forest Service, Arapaho/Roosevelt NF		X	
USDA Forest Service, White River NF		X	
USDA Forest Service, Medicine Bow/Routt NF		X	
NRCS, Kremmling Field Office		X	
NRCS, Walden Field Office		X	
Southern Ute Indian Tribe			X
Ute Mountain Indian Tribe			X
Eastern Shoshone Tribe			X

Table 1-2
Cooperating Agency Participation (as of June 20, 2007) *(continued)*

Agency	Accepted	Declined	Did not Respond
Northern Arapaho Tribe			X
Northern Ute Indian Tribe			X
Arapaho National Wildlife Refuge		X	
US Fish and Wildlife Service	X		

As of June 20, 2007, the BLM has conducted four meetings with the cooperating agencies. Dates, location, and attendance of these meetings is presented in **Table 1-3**. Cooperating agencies were also encouraged to attend the scoping meetings and provide comments as part of the scoping process. Cooperating agencies will be engaged throughout the process, including during alternative development.

Table 1-3
Attendance at Cooperating Agency Meetings (as of June 20, 2007)

April 3, 2007 at KFO	April 4, 2007 at GSFO
Lanny Weddle (Jackson County)	Kathleen Middleton (Garfield County Oil and Gas)
Mike Blanton (Jackson County)	Larry McCown (Garfield County)
Kent Crowder (Jackson County)	Bill Efting (Town of Basalt)
John C. Rich (Jackson County)	Juanita Satterfield (Town of Parachute)
Amy Pemberton (Grand County)	Bill Heicher (Town of Eagle)
Thomas Clark (Town of Kremmling)	Jeff Hecksel (City of Glenwood Springs)
David Huseman (Town of Granby)	Lana Gallegos (Town of Gypsum)
	Keith Montag (Eagle County)
	Dall Hancock (Garfield County)
	Dorothea Farris (Pitkin County)
	David Blanchard (Town of New Castle)
	Craig Meis (Mesa County)
	Creed Clayton (US Fish and Wildlife Service)
May 20, 2007 at KFO	**June 6, 2007 at GSFO**
Amy Pemberton (Grand County)	Kathleen Middleton (Garfield County Oil and Gas)
Lori Clement (Grand County)	Larry McCown (Garfield County)
Mike Blanton (Jackson County)	Keith Montag (Eagle County)
Kent Crowder (Jackson County)	Dorothea Farris (Pitkin County)
John C. Rich (Jackson County)	Cindy Howben (Pitkin County)
David Huseman (Town of Granby)	Bill Efting (Town of Basalt)
Lyle Sidner (Colo. Dept. of Wildlife)	Bill Heicher (Town of Eagle)
	Jason Naess (City of Rifle)
	Jeff Hecksel (City of Glenwood Springs)
	Lana Gallegos (Town of Gypsum)
	Craig Wescoatt (Colo. Dept. of Wildlife)
	Perry Will (Colo. Dept. of Wildlife)
	Alexandra Davis (Colo. Dept. of Natural Resources)
	Ted Kowalski (Colo. Water Conservancy Board)
	Creed Clayton (US Fish and Wildlife Service)

1.5.3 Resource Advisory Council

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

As provided for by FLPMA, The US Department of the Interior established the RAC program in 1995 as a forum for local citizens to provide advice and recommendations to the Department of the Interior on management of public lands. RAC members serve a three-year term, which is staggered among members such that one third of the membership is subject to appointment in any given year. The Northwest RAC was chartered in 1995 and must be rechartered every two years.

The BLM gave the Colorado Northwest RAC an initial presentation on the RMP process in November 2006. At the last RAC meeting in May 2007, the BLM gave an additional presentation on the scoping and travel management process. The BLM is exploring the possibility of utilizing a RAC subgroup to participate in the planning process.

1.6 COLLABORATION AND CONSULTATION WITH TRIBES

The BLM has begun the tribal consultation process. Letters requesting consultation have been sent to the tribes listed in **Table 1-4**, Tribal Consultation. The GSFO sent five tribal consultation letters on April 23, 2007 and the KFO sent 12 letters on April 20, 2007. The Southern Ute Indian Tribe and the Ute Mountain Ute Tribe were contacted by both the GSFO and KFO. Follow-up communication with the tribes will occur in Fall 2007.

Table 1-4
Tribal Consultation

Tribe or Agency	Contact	Date	GSFO	KFO
Colorado Commissioner of Indian Affairs	Ernest House, Executive Secretary	4/23/07		X
Eastern Shoshone Tribe	Vernon Hill, Chairman	4/20/07	X	
Northern Arapaho Business Council	Richard Brannen Sr., No. Arapaho Business Council	4/23/07		X
Northern Arapaho Business Council	Robert Goggles, Native American Graves Protection and Repatriation Act Representative	4/23/07		X
Northern Arapaho Tribe	Burton Hutchinson, Sr., Chairman	4/20/07	X	
Northern Arapaho Tribe	Jo Ann White, Tribal Historic Preservation Office Director	4/23/07		X
Shoshone Tribe	Glenda Trosper, Director Cultural Center	4/23/07		X
Shoshone Tribe	Ivan Posey, Shoshone Business Council	4/23/07		X
Southern Ute Indian Tribe	Clement Frost, Chairman	4/20/07	X	
		4/23/07		X
Southern Ute Indian Tribe	Neil Cloud, Native American Graves Protection and Repatriation Act Representative	4/23/07		X
Northern Ute Tribe	Maxine Natchees, Chairperson	4/20/07	X	
Uintah & Ouray Tribal Business Center	Maxine Natchees, Chairwoman	4/23/07		X
Uintah & Ouray Tribal Business Council	Betsy Chapoose, Native American Graves Protection and Repatriation Act Representative	4/23/07		X
Ute Mountain Ute Tribe	Manuel Heart, Chairman	4/20/07	X	
		4/23/07		X
Ute Mountain Ute Tribe	Terry Knight, Sr., Native American Graves Protection and Repatriation Act Representative	4/23/07		X

SECTION 2
COMMENT SUMMARY

2.1 METHOD OF COMMENT COLLECTION AND ANALYSIS

Although the end of the official GSFO/KFO RMP scoping period was May 2, 2007, all written scoping comments received through June 16, 2007, were evaluated and documented in this Scoping Summary Report. Only four written submissions were received after June 16, 2007. Due to the late receipt of those comments, the BLM was unable to incorporate them into the comment summary analysis; however, the comments were evaluated in Section 3, Issue Summary, of this scoping report and will be considered in alternative formulation and project planning. These and any other comments received during the RMP process will be considered during alternative formulation and project planning.

Individuals were encouraged to submit comments in writing unless a special request was made; no such requests were made. The BLM will continue to accept comments throughout the planning process. The comments received and evaluated in this Scoping Summary Report will be considered in alternative formulation and initial impact evaluations.

A total of 105 written submissions were received by June 16, 2007. The BLM comment form (**Appendix B**) was the format most commonly used to submit comments, via the project Web site, an in-person submittal at the public scoping meetings, or by US Postal Service. Some chose not to use the form and submitted comments via letters submitted by US Postal Service, e-mail, or fax. The specifics of the written submission formats and methods are as follows:

- 45% via the BLM comment form on the project Web site;
- 11% via the BLM comment form at a public meeting;
- 9% via the BLM comment form submitted by US Postal Service;
- 19% via electronic mail;

- 11% via a letter sent by US Postal Service; and
- 5% by fax.

A list of commentors and the date of submittal is provided in **Appendix E**. Most written submissions included numerous comments, so the 105 submissions included a total of 766 separate comments. The comment forms provided instructions on requesting confidentiality and on requesting that individual names or addresses be withheld from public review or from disclosure under the Freedom of Information Act. Only one commentor requested confidentiality.

To ensure that public comments were properly registered and that none were overlooked, a multiphase management and tracking system was used. First, written submissions were logged and scanned in their entirety. Second, submissions were numbered and assigned an affiliation code and a geographic location code of the sender; that is, the GSFO, the KFO, or outside the planning area. Third, issues and concerns within the submission were categorized into one of the planning issue categories or one of the other issue categories and coded accordingly. Fourth, planning issues were further coded to reflect the geographic area and resource category of concern. To assist with the analysis, the BLM entered comment codes into a database and organized comment codes by planning issue categories, geographical location of the commentor, geographic area of concern, and affiliation of the commentor. Finally, these identifiers were queried and tallied to provide information on planning and other issue categories and to pinpoint regions or groups providing the most feedback.

2.2 SUMMARY OF PUBLIC COMMENTS RECEIVED

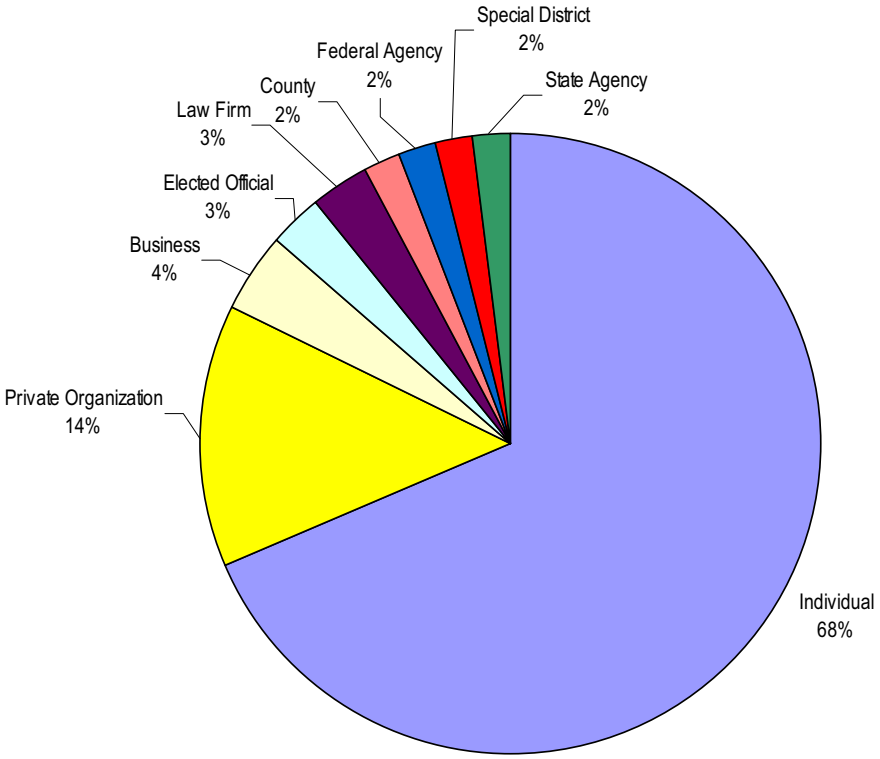
2.2.1 Written Submissions by Affiliation

Table 2-1, Number of Written Submissions per Affiliation, and **Figure 2-1**, Proportion of Written Submissions per Affiliation, show the number and proportion of written submissions received from each type of affiliation. Individuals who did not disclose a particular affiliation provided 68% of the total comments received during the GSFO/KFO RMP scoping period. Private organizations provided 14%. Businesses submitted 4% of the total. Elected officials and law firms representing various clients each provided 3% of the total number of comments received for a combined total of 6%. Federal, state, and county governmental agencies each submitted 2%, for a total of 6%. Last, special districts provided 2% of the total number of comments received. No comments were received from municipalities or from tribal governments. A list of commentors, their affiliations, and the submittal date of their comments are listed in **Appendix E**.

Table 2-1
Number of Written Submissions per Affiliation

Affiliation	Number of Written Submissions
Individual	70
Private organization	14
Business	4
Elected official	3
Law firm	3
Federal agency	2
State agency	2
County	2
Special district	2
Total	**105**

Figure 2-1 Proportion of Written Submissions per Affiliation



2.2.2 Written Submissions by Geographical Area

Table 2-2 (Number of Written Submissions by Affiliation and Location of Sender) and **Figures 2-2** through **2-4** show the number and proportion of written submissions received from each affiliation by the geographic location of the sender. Geographic locations were split among the GSFO, KFO, and outside the planning area. Comments from residents within the GSFO or KFO geographic areas were submitted primarily by individuals, with submittals from organizations second. Comments originating from residents outside the planning area came equally from individuals and organizations. Most comments from outside the planning area originated from the Front Range of Colorado, particularly the Denver metro area. Table 2-2 and Figures 2-2 through 2-4 further illustrate the affiliations by geographic location for written submissions. Two out of the 105 written submissions received did not indicate a geographic origin. These two submissions are not reflected in the calculations.

Table 2-2
Number of Written Submissions by Affiliation and Location of Sender

Affiliation	GSFO Number of Written Submissions	KFO Number of Written Submissions	Outside GSFO and KFO Number of Written Submissions
Individual	44	17	8
Private Organization	4	3	8
Business	0	2	3
Elected Official	1	2	0
Law Firm	0	0	3
Federal Agency	0	1	1
State Agency	0	0	2
County	0	2	0
Special District	2	0	0
Total	**51**	**27**	**25**

Figure 2-2 Proportion of Written Submissions by Affiliation and Location of Sender for the GSFO

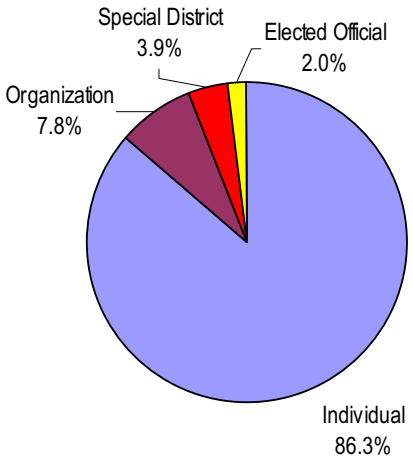


Figure 2-3 Proportion of Written Submissions by Affiliation and Location of Sender for the KFO

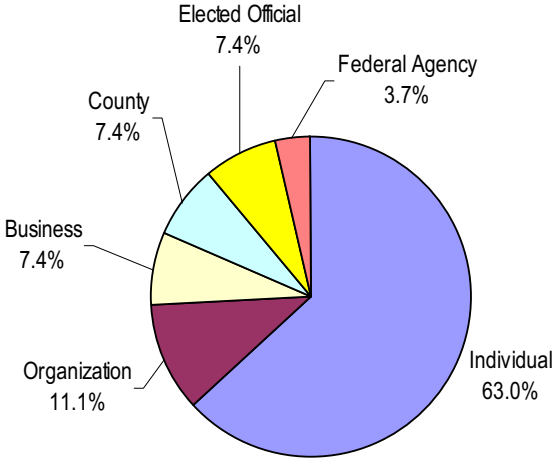
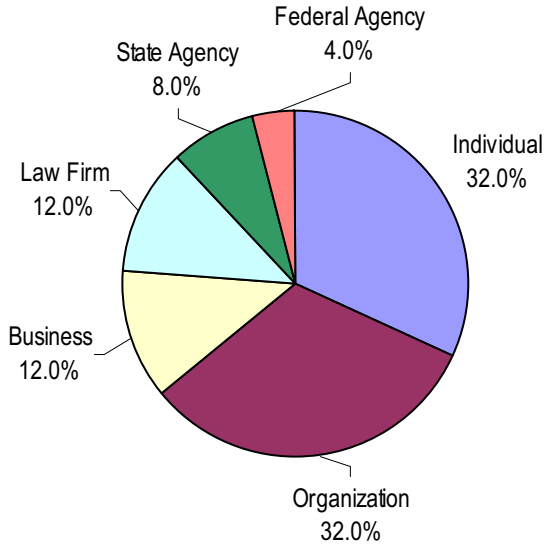


Figure 2-4 Proportion of Written Submissions by Affiliation and Location of Sender (for the area outside the GSFO and KFO)



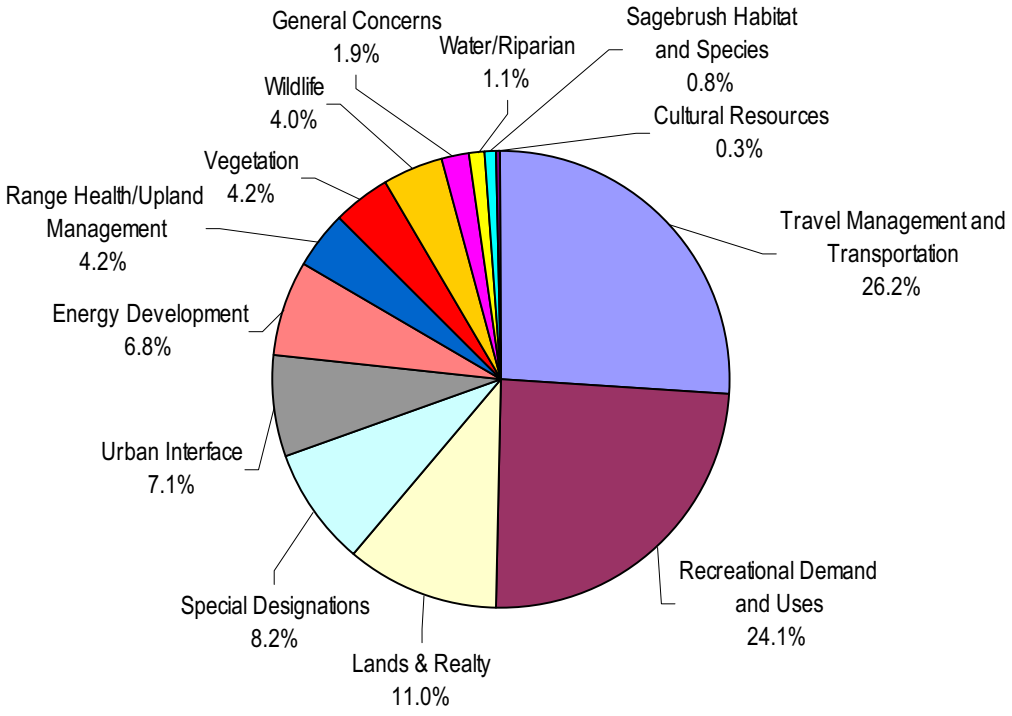
2.2.3 Comments by Planning Issue Category

Of the total 766 comments received, 81% were related to a planning issue. Nineteen percent were related to one of the other issue categories such as NEPA, RMP, or public involvement processes, implementation or policy issues, or issues outside the scope of this study. These types of comments are discussed in detail in Section 3.4, Public Comments Not Applicable to Planning Issue Categories and Planning Issues That Will Not Be Addressed. The BLM received 619 planning issue comments and categorized them into twelve planning issue categories and a general category entitled General Concerns. **Table 2-3**, Number of Individual Comments per Planning Issue Category, and **Figure 2-5**, Proportion of Individual Comments per Planning Issue Category, show the number and proportion of comments on each planning issue category. Section 3, Issue Summary, provides a detailed analysis of the comments received for each planning issue category. Most of the comments related to planning issues focused on travel management (26%), recreation (24%), and lands and realty (11%). Special designations (8%), urban interface (7%), and energy development (7%) issues also received relatively large numbers of comments. Issues expressed on range health/upland management, vegetation, and wildlife each made up only 4% of the total comments received, for a combined total of 12%. Only 1% of the comments received were regarding water and riparian issues. The planning issue categories of sagebrush habitat/species and cultural resources received only a few comments, representing less than 1% each of the total comments received. General concerns, such as expressions of support for multiple use of BLM lands and no further restrictions on uses, constituted about 2% of the total.

Table 2-3
Number of Individual Comments per Planning Issue Category

Planning Issue Category	Number of Individual Comments
Travel management and transportation	162
Recreational demand and uses	149
Lands and realty	68
Special designations	51
Urban Interface	44
Energy development	42
Range health/upland management	26
Vegetation	26
Wildlife	25
Water/riparian	7
Sagebrush habitat and species	5
Cultural resources	2
General concerns	12
Total	**619**

Figure 2-5 Proportion of Individual Comments per Planning Issue Category



SECTION 3
ISSUE SUMMARY

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

3.1 CHRONOLOGY OF PLANNING ISSUE DEVELOPMENT

The BLM enacted a multistep issue identification process for the GSFO/KFO RMP planning effort that began in 2005.

In September 2005, the BLM prepared a Pre-Plan Analysis and Project Management Plan for the GS/KFO RMP/EIS. This plan, used by the interdisciplinary team to begun the planning process, summarized the purpose and need for the RMP. It also highlighted anticipated planning issues, management concerns, and preliminary planning criteria developed by the BLM interdisciplinary team during internal scoping. Based on the lands and resources managed in the planning area, these preliminary issues fell into eight preliminary issue categories in the pre-plan analysis:

1. Energy development;
2. Range health/upland management;
3. Water/riparian;
4. Recreation demand and uses;
5. Comprehensive travel management and transportation;
6. Cultural resources (high concentrations of cultural sites);
7. Maintaining habitat for sage-grouse and sagebrush obligate species; and

8. Rapidly expanding urban interface areas.

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

The BLM then issued the NOI to prepare the RMP, which initiated the 60-day scoping period, and solicited written comments from the public (further discussed in Section 1.4, Description of the Scoping Process). Scoping is a collaborative public involvement process implemented to identify and refine planning issues to address in the planning process. During the scoping period, the BLM also engaged tribes and cooperating agencies, as discussed in Sections 1.5, Agency Coordination/Cooperating Agencies, and 1.6, Collaboration and Consultation with Tribes. The BLM hosted seven open houses and solicited written comments from the public during the scoping period. The scoping period provided the BLM additional information on the public's concerns and suggestions regarding the planning area.

Four new issue categories were identified from public input during the scoping process. In addition, there were some other general concerns that were expressed and captured in a General Concerns category, as follows:

9. Wildlife;
10. Vegetation;
11. Special designations; and
12. Lands and realty.

The wildlife issue category included all wildlife comments that were not specifically related to sagebrush species (covered in Category 7 above). Vegetation included comments on forestry and logging, fire management, invasive species, and noxious weeds. Special designations encompassed Areas of Critical Environmental Concern (ACECs), Wilderness Study Areas (WSAs), and WSRs. Lands and realty included comments about land tenure as well as land uses, such as utility corridors. General concerns included comments supporting the continuation of multiple use management, opposing additional restrictions or regulations, and vaguely stated concerns, such as "regulation and law enforcement," wherein not enough specificity was provided to accurately determine the issue or concern.

Information included in the pre-plan analysis, gathered from meetings with interested individuals, organizations, agencies, and tribal representatives, and heard and accepted during the public scoping process were compiled and evaluated to supplement and refine the preliminary issue categories and to develop discreet planning issue statements, which are discussed below in Sections 3.2, Planning Issue Statements. The purpose of these planning issue statements is to highlight the key issues distilled from these initial planning and scoping processes. The issues are

discussed in Section 3.3, Public Comments by Planning Issue Category, according to the various issue categories and associated comments received from the public, which included interested individuals, agencies, elected officials, businesses, and organizations.

3.2 PLANNING ISSUE STATEMENTS

The planning issue categories (from Section 3.1, Chronology of Planning Issue Development) were rearranged in descending order of the number of comments received for each category. In addition, the titles of each category were slightly abbreviated for ease of reference. Then a planning issue statement was developed for each of the twelve planning issue categories. A planning issue statement was not developed for the category of General Concerns due to the very general nature of the comments. Each planning issue statement summarizes the issues and concerns heard for each category. The twelve planning issue statements follow.

1. **Travel management and transportation—**How will transportation be managed to protect natural and cultural resources, to provide motorized and nonmotorized recreation opportunities, to reduce user conflicts, to enforce route designations and closures, and to improve public access?
2. **Recreational demand and uses—**How will recreation be managed to maintain and improve recreation sites and trails, especially in close proximity to communities, to reduce user conflicts, to protect natural and cultural resources, to provide a variety of recreational opportunities, and to maximize socioeconomic benefits?
3. **Lands and realty—**What opportunities exist to make adjustments to public land ownership that would result in greater management efficiency, in appropriate and agreeable levels of public access, and in increased public and natural resource benefits?
4. **Special designations—**Where are special designations appropriate to protect unique resources, and how should existing special designations be managed to protect the natural and cultural resources and maximize recreational opportunities and socioeconomic benefits?
5. **Urban interface—**How will BLM lands in urban interface areas be managed to provide desired benefits by the public and to be consistent with future land use plans in neighboring communities?
6. **Energy development—**Which areas should be open to energy development, particularly oil and gas leasing, and what restrictions should be employed to protect cultural and natural resources and minimize user conflicts?
7. **Range health/upland management—**How will the BLM manage livestock grazing on public lands while protecting, managing, restoring, and using natural and cultural resources?
8. **Vegetation—**What actions or restrictions will be needed to reduce dangerous fuel loading, to control and prevent the spread of noxious weeds

and other undesirable plant species, and to maintain healthy forest ecosystems?

9. **Wildlife—**How will uses and land management activities be managed to maintain and improve terrestrial and aquatic habitats in a scattered land ownership pattern, while maintaining multiple-use land management?
10. **Water/riparian—**What measures will be implemented to protect water resources, especially riparian areas, from the effects of other uses?
11. **Sagebrush habitat and species—**How will sagebrush habitat be managed to reduce continued habitat loss and fragmentation?
12. **Cultural resources—**How can the BLM protect and conserve cultural resources, and where do interpretation opportunities exist?

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

3.3 PUBLIC COMMENTS BY PLANNING ISSUE CATEGORY

This section provides summaries of the public comments received during the public scoping process. All written submissions have been reproduced in their entirety in **Appendix F**, Written Scoping Submissions. As discussed previously in Section 2.1, Method of Comment Collection and Analysis, each separate comment received during public scoping was reviewed and coded. Comments that constituted planning issues were coded by issue category, resource category, and the geographic location of concern as referred to by the commentor. The geographic locations were divided between the KFO, GSFO, or a general or unspecified area. The planning issues are discussed for each issue category in Sections 3.3.1 through 3.3.13 of this report, below.

Table 3-1 (Number of Individual Comments per Planning Issue Category by Geographic Area of Concern) illustrates how the 619 planning issue comments were divided among planning issue categories and geographic areas of concern. Most of the 244 comment submitters did not specify a field office but instead referred to BLM lands in general or both field offices. The field office receiving the most comments was the GSFO, totaling 219, followed by the KFO, which received 156 planning issue comments.

Figures 3-1, 3-2, and **3-3** reflect the percentage of comments by planning issue category for each of the three geographic areas of concern. The first is for the GSFO, followed by the KFO, and the general, or unspecified, geographic area.

Table 3-1 and Figures 3-1, 3-2, and 3-3 illustrate that the primary issue category for the GSFO is recreation. About 52% of all the comments received regarding lands for the GSFO concerned recreation. For the KFO and BLM lands in general, travel

management was the issue of greatest concern, receiving 24% and 26% of the comments, respectively. Travel management was the second largest area of concern for the GSFO, receiving 28% of the comments. Thus, 80% of the comments for the GSFO were regarding either recreation or travel management, which are two closely related issues. For the KFO and general area, the issues (other than travel management) were more widespread.

Some comments were not applicable to a planning issue category; those comments are discussed in Section 3.4, Other Issues and Comments. These other issues and comments that are not explicitly included in issue categories or planning statements will still be addressed in the RMP and considered in the effects analysis; however, these concerns will not have overriding influence on the development of alternatives. Furthermore, adjustments or additions may be made to the planning issues as the planning process proceeds and the BLM continues to review information, meet with the interdisciplinary team, and talk with the public.

Table 3-1
Number of Individual Comments per Planning Issue Category by Geographic Area of Concern

Planning Issue Category	GSFO – Number of Individual Comments	KFO – Number of Individual Comments	General – Number of Individual Comments
Travel management and transportation	62	37	63
Recreational demand and uses	113	17	19
Lands and realty	6	7	55
Special designations	6	17	28
Urban interface	21	17	6
Energy development	2	18	22
Range health/upland management	5	12	9
Vegetation	1	11	14
Wildlife	1	13	11
Water/riparian	0	1	6
Sagebrush habitat and species	0	4	1
Cultural resources	0	1	1
General concerns	2	1	9
Total	**219**	**156**	**244**

Figure 3-1 Proportion of Individual Comments per Planning Issue Category by Geographic Area of Concern (GSFO)

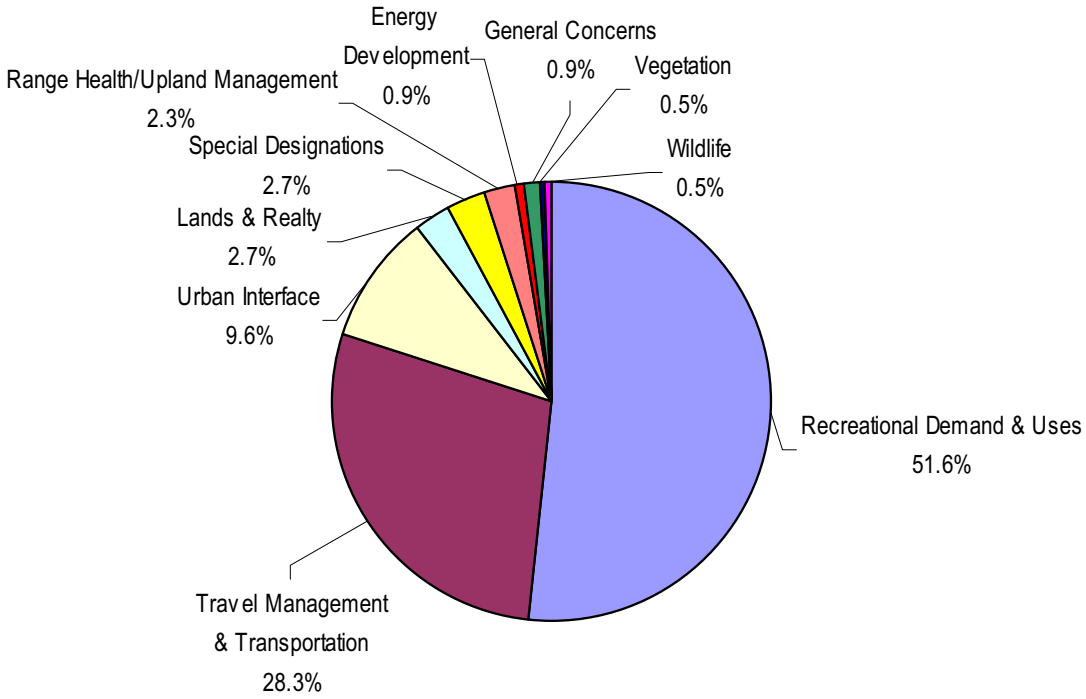


Figure 3-2 Proportion of Individual Comments per Planning Issue Theme by Geographic Area of Concern (KFO)

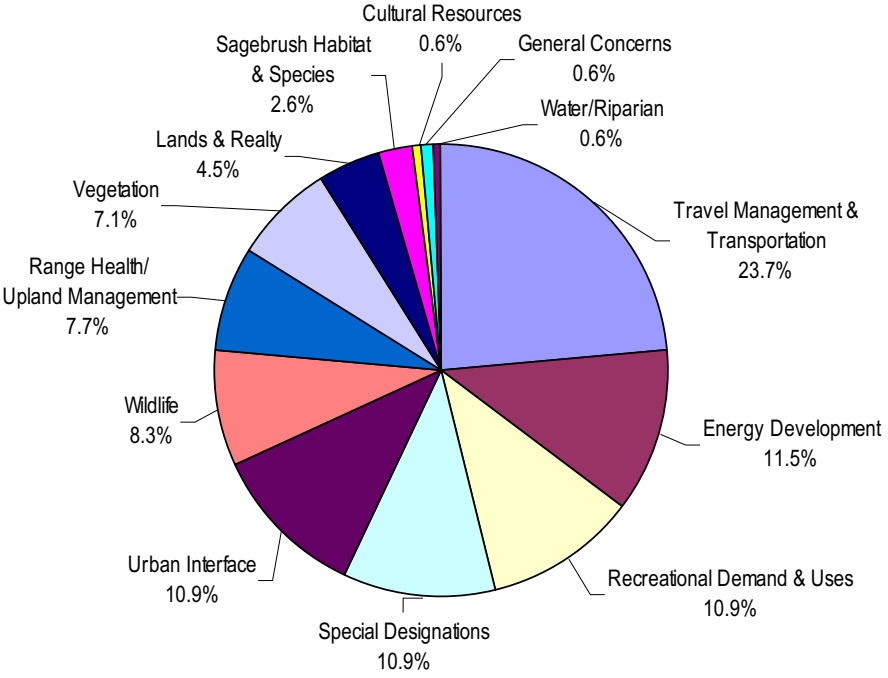
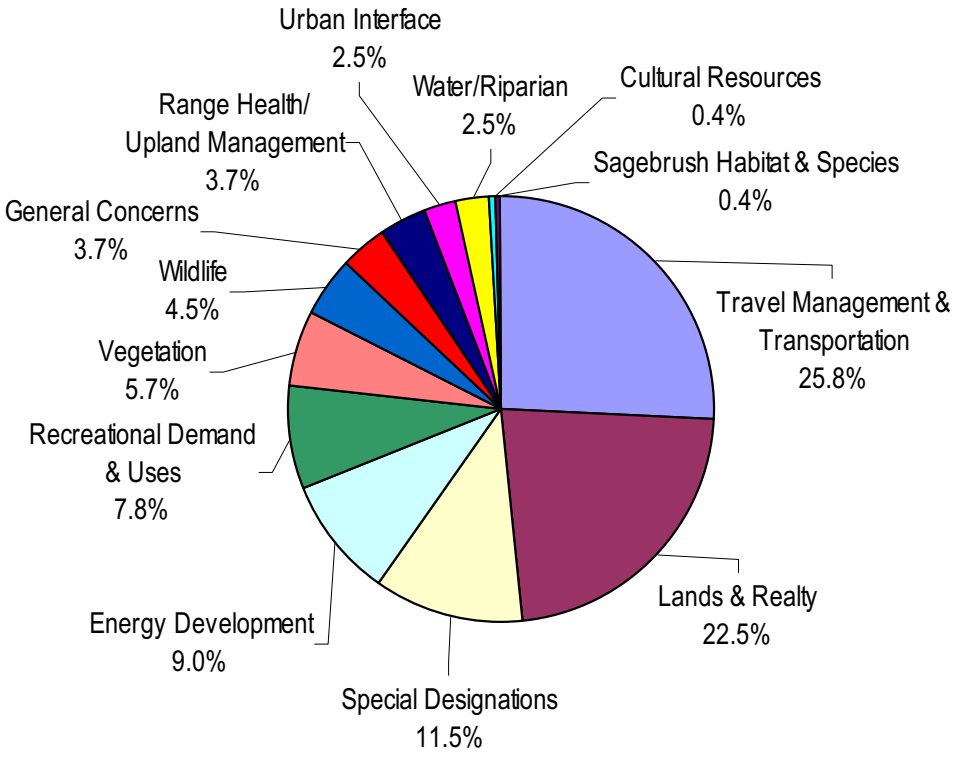


Figure 3-3 Proportion of Individual Comments per Planning Issue Theme by Geographic Area of Concern (General)



3.3.1 Travel Management and Transportation

The BLM received 162 comments about travel management and transportation issues. This represents 26% of the total comments received on planning issues, thereby constituting the category that received the most comments overall. One of the primary issues expressed by respondents was related to use designations on routes and trails, specifically which routes should be motorized versus nonmotorized and which should be closed. Another primary issue was controlling motorized uses to remain on designated routes and increasing law enforcement and fines to increase compliance. Many respondents were concerned about resource degradation, particularly to soils and riparian areas due to off-highway vehicles (OHVs) and all-terrain vehicle (ATV) operators who stray from designated routes. Other frequently cited concerns with OHVs and ATVs were spreading of noxious weeds and the effects on wildlife and grazing from noise, human presence, and resource degradation. The above concerns were expressed by commentors for both field offices but were more prevalent for the KFO. The comments for the GSFO were more over access, including closing access points near subdivisions and providing additional access in new locations. A number of comments for both field offices emphasized the importance of convenient access and good trails and routes to the economy of both areas. Of the 162 comments received that were related to transportation issues, 38% were for the GSFO, 23% were for the KFO, and 39% did not specify a field office.

In addition to the above, other transportation issues for the GSFO included requests for new trails, more trail maintenance on existing trails, and more signs on trails. Support for continued access to, and maintenance of, the trails in the Red Hill and Crown areas was expressed repeatedly, particularly by mountain bikers. One commentor, the Eagle County Board of Commissioners, recommended the creation of a designated location for dirt bike and other OHVs to ride in a controlled setting, which would reduce the proliferation of uncharted trails and reduce user conflicts.

Although the overwhelming majority of comments for the KFO supported restrictions on OHVs and ATVs, route closures, and stricter enforcement, some concerns were expressed that posting route restrictions and closures would be cost prohibitive for the BLM and unsightly for visitors. The North Park Visitors Bureau in particular was opposed to designated routes for snowmobile travel because it would require too much signing by the BLM. They also stressed that since snowmobiles do not do surface damage, seasonal closures for off-road travel might be appropriate.

3.3.2 Recreational Demands and Uses

The planning issue category receiving the second largest number of comments was recreation. Of the 619 comments on planning issues, 24% were regarding recreation. The primary issues expressed by respondents were access to particular recreational areas; continued access to and availability of recreation sites and trails in proximity to their communities, workplaces, and homes; reducing conflicts between different types of recreationists, especially on trails; concerns over resource degradation from recreational activities, particularly from OHVs; and maintaining or expanding the beneficial effects of recreation on the socioeconomics of their communities. A few commentors expressed the importance of opportunities to recreate in solitude and quiet on BLM lands, appreciation for the beauty of the landscape, and support for special designations such as ACECs, Special Recreation Management Areas (SRMAs), WSAs, and WSRs. Of the 149 comments received that were related to recreational issues, 76% were for the GSFO, 11% were for the KFO, and 13% did not specify a field office.

The recreation issue expressed most frequently regarding BLM lands in the GSFO was concern over continued access to climbing at the Thompson Creek ACEC and limitations on the number of climbers allowed in the area at any one time. Climbers expressed overwhelming support for continued access to the area. Some preferred that access no longer be limited to nine climbers at a time; however, climbers approved of this restriction if it was necessary for the BLM to continue to allow climbing in the area. Some recreationists were opposed to climbing at Thompson Creek, particularly due to concerns over resource degradation related to the climbing bolts that have been placed in the rocks. Very few comments were related to the actual ACEC designation of the Thompson Creek area. Of those that did refer to the designation, most supported it, although a few climbers expressed opposition if it would prohibit or restrict climbing.

Other issues frequently expressed regarding the GSFO area were support for continued access to trails close to communities in the Roaring Fork Valley. Support for continued access to, and maintenance of, the trails in the Red Hill and Crown areas was expressed repeatedly, particularly by mountain bikers. A number of comments supported continuing and expanding the economic benefits of accessible and abundant recreation on BLM lands.

For BLM lands in the KFO, the primary concerns were regarding conflicts between users and resource degradation from recreational activities. The most frequently cited conflict occurs between OHV and ATV users and other recreationists, such as hikers, bikers, and horseback riders. Concerns about resource degradation were related to trail ruts, erosion, and damage to riparian resources from OHVs and ATVs.

3.3.3 Lands and Realty

Comments on lands and realty made up the third largest category of planning issues. Eleven percent of the 619 comments received were on this issue. Most of the comments were from the Utilities Union Telephone Company regarding BLM lands in general and were submitted via the company's law firm. The company encouraged the BLM to maintain existing utility corridors, add additional corridors, and allow the siting of wireless communications infrastructure outside utility corridors. The remaining comments submitted on lands and realty were from individuals. Many urged the BLM to restrict development on public lands and maintain the current landscape, scenic beauty, and "Old West" feel. Others were concerned about land tenure and asked that public lands be retained and not sold to private interests. A few comments were on specific land exchanges, such as Blue Valley. Of the 68 comments received regarding lands and realty issues, 9% were for the GSFO, 10% were for the KFO, and 81% were for BLM lands in general.

3.3.4 Special Designations

Fifty-one comments were received about special designations, representing 8% of the total number of comments received. This constitutes the fourth largest planning issue category. The primary issue was ACECs, with most comments expressing support for existing ACECs and encouraging additional designations. A few respondents were opposed to ACEC designations because they felt it imposes too many restrictions, while a few others recommended that the protection afforded by an ACEC designation be expanded. The Thompson Creek ACEC was the area most commonly referred to specifically. The Colorado Natural Heritage Program recommended that ten Potential Conservation Areas receive ACEC status. In addition to ACEC comments, many respondents expressed support for WSR designations and a few comments supported SRMA designations. Most of the comments received regarding special designations were from environmental groups, and most of the remaining comments were from individuals. Twelve percent of the 51 comments received on special designations were for BLM lands in the GSFO, 33% were for the KFO, and 55% did not specify a field office.

3.3.5 Urban Interface

Urban interface issues received 7% of the total comments submitted on planning issues. Respondents supported the use of BLM lands as a type of open space to buffer explosive development and to maintain the rural and scenic qualities around the communities within both field offices. The BLM was encouraged to comply with county master plans. A specific request was made for the KFO to retain the land above the Granby landfill or to consent to a land transfer only if it included a conservation easement for the parcel. Of the 44 comments received regarding urban interface issues, 48% were for the GSFO, 39% were for the KFO, and 14% did not specify a field office.

3.3.6 Energy Development

The planning issue category receiving the sixth largest number of comments was energy development. Of the 619 comments on planning issues, 7% were regarding energy development, roughly the same percentage of comments as for urban interface issues. Comments about energy development on BLM lands were divided, with some commentors supporting such development and some opposed. Most of those supporting energy development advocated strong measures to protect the environment. Most of the comments on energy development were regarding oil and gas, with only a few comments on mineral extraction. Comments were received from multiple affiliations, including individuals, an environmental group, an energy company, a Colorado state agency, and a law firm representing multiple energy companies. Only 5% of the 42 comments received on energy development were for BLM lands in the GSFO, while 43% were for the KFO, and 52% referred to BLM lands in general.

Most of the support for energy development on BLM lands was expressed by energy companies, either directly or via their attorneys. A few individuals also expressed their support. Williams Production RMT Company acknowledged that increased production will increase impacts but stressed that the impacts are temporary and can be mitigated with improved drilling technology, which they employ. Williams urged the BLM to implement site-specific, rather than general stipulations and advocated for year-round drilling since seasonal drilling can cause more substantial impacts due to mobilization and demobilization. A law firm representing several oil and gas companies commented that BLM lands within the GSFO and KFO should be used to their full extent to help meet the nation's energy needs. They urged the BLM to impose only reasonable restrictions on oil and gas development, per Section 363 of the Energy Policy Act of 2005.

Opposition to and concerns about the environmental effects of energy development, particularly oil and gas leasing, was expressed by multiple individuals, an environmental group, and a Colorado state agency. Commentors were concerned about the environmental impacts on the land and other resources, such as water, wildlife, and recreation. Long-term impacts were also a concern. Several individuals urged the BLM to protect the land and not succumb to pressure from the oil and gas industry. They expressed support for multiple uses without an emphasis on oil and

gas extraction. Many of the respondents who supported energy development qualified their support, stating that such development should occur only with increased environmental protections, particularly for water, wildlife, and recreational uses. One individual requested that each oil and gas leasing proposal be carefully considered, with the amount of potential extraction and associated environmental impacts clearly documented for the public. The Rocky Mountain Recreation Initiative was concerned about the effects on elk, antelope, and sage-grouse habitat, including habitat fragmentation, as a result of oil and gas leasing. They also specifically expressed opposition to an oil and gas lease on Wolford Mountain within the KFO, particularly since it constitutes critical winter range for ungulates, which is unique habitat in that area. The Rocky Mountain Recreation Initiative urged the BLM to prohibit or restrict oil and gas leasing. The Colorado Division of Wildlife (CDOW) expressed multiple concerns, including overall effects on the landscape, noxious weeds, reclamation, and mitigation.

3.3.7 Range Health/Upland Management

Twenty-six comments were received about range health or upland management, representing 4% of the 619 comments received on planning issues. The comments were divided, with about half of the respondents supporting the continuation of livestock grazing and about half advocating that grazing be prohibited or severely restricted. Of the 26 comments received regarding range health or upland management issues, 19% were for the GSFO, 46% were for the KFO, and 35% did not specify a field office.

Those in favor of continuing grazing said it is a traditional land use that maintains the culture and customs of the area, that seasonal livestock grazing is the best use of open sagebrush land since that land type is prone to erosion, and that grazing does not damage the land if done with proper management. A concern was expressed that cattle grazing be allowed to continue in the Crown area of the KFO. The Grand County Division of Natural Resources and one rancher expressed support for the BLM to continue grazing management in accordance with the Standards for Public Land Health and Guidelines for Livestock Grazing Management in Colorado. Grand County also urged the BLM to maintain and improve rangeland in Middle Park that is critical wintering habitat for several big game species.

Many respondents either oppose continued cattle grazing on BLM lands or would like the BLM to impose greater restrictions on the number of permits, amount of cattle, and designated grazing areas. Issues and concerns from livestock grazing include damage to the land, particularly in riparian areas, destruction of trails and native vegetation and an increase in weeds, and conflicts with recreational uses. One respondent recommended better maintenance of water tanks to keep cattle away from riparian areas. Another said that grazing rates are too low and should be increased. One commented that cattle grazing is an outdated use of BLM lands in the Roaring Fork Valley.

3.3.8 Vegetation

Vegetation received the same number of comments as range health. Only 26 comments were received on this issue, representing 4% of the total number of comments received on planning issues. Comments included concerns over the spread of noxious weeds, particularly from OHVs and ATVs, the spread of exotic species, support for logging, and both support for and opposition to the use of fire as a vegetation management tool. Of the 26 comments received on vegetation, only 4% were for the GSFO. Most were regarding lands in the KFO or for BLM lands in general: 42% and 54%, respectively.

3.3.9 Wildlife

Wildlife issues received roughly the same number of comments as range health and vegetation. Twenty-five comments were received on this issue, which constitutes 4% of the total number of planning issue comments received. Individuals, environmental organizations, and the CDOW expressed support for the protection of wildlife habitat, particularly winter range and big game migration corridors. These respondents also expressed concerns about habitat loss and habitat fragmentation due to development. Opposition to aerial shooting of predators was expressed by a few individuals. Only 4% of the 25 comments received on wildlife were for BLM lands in the GSFO, while 52% were for the KFO, and 44% referred to BLM lands in general.

3.3.10 Water/Riparian

Only seven comments were received about water or riparian issues, representing 1% of the 619 comments received on planning issues. Comments included concerns about the effects on riparian areas from grazing and about the beauty of the Colorado River and support for maintaining it in its current condition. Of the seven comments received on water or riparian issues, 14% were for the KFO and 86% did not specify a field office. No comments were received on this issue for the GSFO.

3.3.11 Sagebrush Habitat and Species

Less than 1% of the total planning issue comments received was regarding sagebrush habitat or species. The CDOW and one environmental group expressed concerns about sagebrush steppe fragmentation and the effects on sagebrush-dependent species, including sage-grouse. No comments were received on this issue for the GSFO. Of the five comments received on this topic, three of the comments (80%) were for the KFO and the other two comments (20%) did not specify a field office.

3.3.12 Cultural Resources

Cultural resources issues received the least number of comments of all thirteen planning issue categories. Only two comments were received on cultural resources, representing 0.3% of the total planning issue comments received through scoping. One comment for the KFO stated that preservation of cultural resources should be a top priority for the BLM. The other comment supported interpretation of natural and historic features on BLM lands. No comments were received on this issue for the GSFO.

3.3.13 General Concerns

General concerns, which do not fit into any of the other planning issue categories, received roughly 2% of the 619 planning issue comments submitted. General concerns included comments supporting the continuation of multiple use management, opposing additional restrictions or regulations, and vaguely stated concerns such as "regulation and law enforcement" that did not include enough specificity to accurately determine the issue or concern. Of the 12 comments received regarding general concerns, 17% were on lands in the GSFO and 8% were for KFO lands. Seventy-five percent of the comments about general concerns did not specify a field office.

3.4 OTHER ISSUES AND COMMENTS

Of the 766 comments received, 81% were related to planning issues that will be addressed in the RMP (as discussed above). Another 3.5% were issues that will not be addressed in the RMP; these include administrative/policy issues, implementation issues, issues outside the scope of the RMP, or issues that have already been addressed through other BLM activities. The remaining 16% of comments focused on other topics, such as the planning process in general, alternatives, or the public involvement process. **Table 3-2** summarizes the distribution of comments followed by a discussion of the categories.

Table 3-2
Written Submissions by Issues or Other Categories

Issue or Other Category	Total	Percent of Total
Planning issues to be addressed in the RMP	619	81%
Admin or policy issue	20	3%
Implementation level issue	6	1%
Issues outside the scope of the RMP	1	<1%
Issues that have already been addressed	0	0
Process oriented	87	11%
Alternatives	3	<1%
Public involvement process	30	4%
Total	**766**	

Administrative or policy issue comments will not be addressed during the RMP process. Addressing administrative issues constitutes formulating policy, which is done by the BLM at the national level. Some examples of the administrative or policy comments received include a request that the BLM consider how their management decisions affect global warming; a request that the BLM promote family ranching; a comment on the agency's standards for identifying and managing lands with wilderness characteristics; and a request that the BLM develop new recreational classifications.

Addressing implementation issues requires on-site actions that follow RMP decisions. Only a few comments on implementation issues were received and most were requests for installation of toilets at trailheads, particularly near the Thompson Creek ACEC. One respondent indicated a willingness to pay a nominal trail fee to help fund such installation. A need for trash receptacles at trailheads was also expressed.

Only one comment was received that was considered a planning issue outside the scope of the RMP. The respondent urged the BLM to restrict or try to completely stop subsurface oil and gas and other leasing on Forest Service and other lands. The BLM does not have the authority to impose such restrictions.

No issues were raised by the public that had already been addressed outside of the RMP planning process.

The majority of process-oriented comments were from environmental groups, energy development businesses, law firms, and the Environmental Protection Agency (EPA). These respondents advised the BLM of applicable statutes, regulations, orders, and the BLM Land Use Planning Handbook (H-1601-1) that they were required to comply with during the planning process. Statutes frequently cited included the NEPA and FLPMA, and orders included the Executive Order 13212 on completion of RMPs and EISs. Instruction and executive memoranda on oil and gas development were also cited. Respondents also made some general process-oriented comments on such topics as mitigation. The EPA had numerous process-oriented comments, which included urging the BLM to model air quality and to monitor environmental trends.

The three comments on alternatives included a request for the BLM to consider wilderness during alternative development; a recommendation that a reasonable range of route designation alternatives be considered; and a recommendation for BLM to develop alternatives to avoid or mitigate the impacts associated with the use of gravel pits to support oil and gas development.

Most comments on the public involvement process were from individuals and included requests to involve particular citizen groups in the planning process, particularly regarding trails and route designations.,

3.5 COMMENTS RELATED TO DESIRED OUTCOMES AND MANAGEMENT ACTIONS

The planning process requires that RMPs identify three key components: (1) Desired outcomes expressed in terms of goals and objectives; (2) Uses, or allocations, that are allowable, restricted, or prohibited on the public lands and mineral estate; and (3) Management actions to achieve the desired outcomes, including actions to maintain, restore, or improve land health. To assist the BLM in this process, the scoping comment form (**Appendix B**) included three targeted questions to solicit focused input related to these components. Comments that specifically addressed these questions are provided in **Appendix G**.

3.6 ANTICIPATED DECISIONS

FLPMA requires the BLM to manage public lands using the principles of multiple use and sustained yield. Management direction resulting from the planning process for the RMP needs to be adaptable to changing conditions and demands over the life of the RMP. RMPs provide management direction and help with decision making regarding appropriate multiple uses and allocation of resources. They also develop strategies to manage and protect resources and establish systems to monitor and evaluate the status of resources and effectiveness of these management practices. As part of an analysis of the management situation, the BLM is reviewing the condition of the environment and the management situation to identify which management decisions should be continued, which management directions should be modified, and which management directions should be developed and added.

This scoping report does not make any decisions, nor does it change current management direction set forth in the 1984 GSFO and KFO RMPs. Instead it summarizes those issues distilled from comments identified during the scoping period for the GS/KFO RMP planning area. The BLM will use planning issues summarized in this scoping report, along with subsequently identified issues, planning criteria, and other information (such as occurrence and development potential for minerals), to help formulate a reasonable range of alternatives during the next phase of the RMP process. Each identified alternative (including continuation of existing management) will represent a complete and reasonable plan for managing the GSFO and KFO. Future decisions will occur at two levels: the RMP (or land use planning) level and the implementation level. These decision types are described below. In general, only RMP-level decisions will be made as part of the RMP process. The BLM's evaluation of identified alternatives will be documented in an EIS prepared as part of the RMP process (as required by NEPA).

3.6.1 Future RMP-Level Decisions

Future RMP-level decisions will be made on a broad scale. These decisions will identify management direction and guide actions for the next 10 to 20 years within the planning area. The RMP will provide a comprehensive yet flexible framework for managing the numerous demands on resources managed by the BLM.

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

The second category of RMP-level decisions, allowable uses, and actions to achieve desired outcomes will be expressed in the RMP as allowable uses, actions needed,

and land tenure decisions. Livestock grazing, administrative designations (for example, ACECs), and land disposal are examples of some RMP-level decisions in this category.

3.6.2 Future Implementation Decisions

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

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

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

3.7 SPECIAL DESIGNATIONS, INCLUDING NOMINATIONS

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

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SECTION 4
PLANNING CRITERIA

Planning regulations covering public land managed by the BLM (43 CFR 1610.4-2) require preparation of planning criteria to guide development of all RMPs or revisions. Planning criteria are the constraints or ground rules that guide and direct the development of the plan. They ensure that plans are tailored to the identified issues and that unnecessary data collection and analyses are avoided. Planning criteria are based on standards prescribed by applicable laws and regulations, agency guidance, the result of consultation and coordination with the public, other federal, state, and local agencies and governmental entities, and Native American Indian tribes, analysis of information pertinent to the planning area, and professional judgment.

The following preliminary criteria were developed internally and have been extracted from the Preparation Plan for the RMP Revisions for the GSFO/KFO. The public will review the criteria before the plan/EIS process. After public input is analyzed, it becomes proposed criteria and can be added to or changed as the issues are addressed or new information is presented. The field office managers will approve the issues and criteria, along with any changes. The plans will be completed in compliance with the FLPMA (43 US Code 1701 et seq.) and NEPA.

- Decisions in the plan will be compatible with the existing plans and policies of adjacent local, state, and federal agencies as long as the decisions are in conformance with federal laws and regulations that direct resource management on the public lands.
- The plan will recognize valid existing rights.
- The BLM will recognize in the plan the specific niche that federal lands provide both to the nation and to the surrounding community. A successful plan will be one that is responsive to both national needs and community needs.

- Public participation will be encouraged throughout the process. The BLM will collaborate and build relationships with tribes, state and local governments, federal agencies, local stakeholders, and others in the community of interest. Collaborators are regularly informed and offered timely and meaningful opportunities to participate in the planning process.
- The Energy Policy and Conservation Act inventory results will be integrated into land use planning and energy use authorizations.
- The plan will identify SRMAs, will designate OHV areas, and will complete defined travel management networks for each field office.
- Environmental protection and energy production are both desirable and necessary objectives of sound land management practices and are not to be considered mutually exclusive priorities.
- For all stipulations developed in new land use plans and to further improve consistency and understanding of lease stipulations, state and field offices will use the Uniform Format for Oil and Gas Lease Stipulations prepared by the Rocky Mountain Regional Coordinating Committee in March 1989. Lease stipulations will be reviewed for consistency with neighboring field offices and states, and where there are discrepancies, efforts will be undertaken to try and get consistency.
- The plan will incorporate the Colorado Rangeland Health Standards and Guidelines. It will lay out a strategy for ensuring that proper grazing practices are followed. Grazing will be managed to maintain or improve the health of the public lands by incorporating conditions to enhance resource conditions into permitted operations.
- Lands with wilderness characteristics may be managed to protect and preserve some or all of those characteristics. This may include protecting certain lands in their natural condition and providing opportunities for solitude or primitive and unconfined types of recreation.
- The BLM will identify existing and potential utility corridors (potential corridors include existing right-of-way routes that can be considered for additional facilities and thus be considered a corridor if not already so designated); it also will identify existing and potential right-of-way development sites, such as energy development areas (e.g., wind energy sites) and communication sites.
- The BLM will reevaluate lands selected for disposal and acquisition based on current information.

SECTION 5
DATA SUMMARY/DATA GAPS

As part of the RMP planning, evaluation, and data collection process, the BLM has inventoried available information and has identified data needs for travel management, visitor use, socioeconomics, and the potential designation of wild and scenic rivers. Travel management workshops with the public were held in June 2007 so the BLM could obtain updated information on existing trails and routes that are currently unmapped. Visitor use surveys are being conducted by the University of Arizona to determine types of use and use patterns. Socioeconomic workshops will be conducted to document existing socioeconomic conditions and assist in determining potential effects from any BLM management changes. A Wild and Scenic River Suitability Study is being conducted to determine the suitability of eligible river segments within the planning area.

Both new data obtained and existing resource information available in the GSFO/KFO, including geographic information system theme maps, will be used in formulating resource objectives and management alternatives. Information is being compiled and put into digital format for use in the planning process and development of resource maps for the RMP/EIS. Information already in a digital format must be updated to the same standards required for newly entered data. Because this information is imperative to quantify resources, to update maps, and to manipulate information during alternative formulation, this process must be completed before actual analysis can begin. New data generated during the RMP process will be used to address planning issues and will meet applicable established standards. This information can be made available on request.

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SECTION 6
FUTURE STEPS

6.1 SUMMARY OF FUTURE STEPS AND PUBLIC PARTICIPATION OPPORTUNITIES

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

The analysis of the alternatives will be documented in a draft RMP/EIS. Although the BLM welcomes public input at any time during the planning process, the next official public comment period will begin when the draft RMP/EIS is published, which is anticipated for 2008. The draft document will be widely distributed to elected officials, regulatory agencies, and members of the public, and it will be available on the project Web site at www.blm.gov/rmp/co/kfo-gsfo. The availability of the draft document will be announced via a Notice of Availability in the *Federal Register*, and a 90-day public comment period will follow. Public meetings will be held in Rifle, Granby, Carbondale, Kremmling, Gypsum, and Walden during the 90-day period.

At the conclusion of the public comment period, the draft RMP/EIS will be revised. A proposed RMP/final EIS will then be published. The availability of the proposed document will be announced in the *Federal Register*, and a public protest period will follow regarding the proposed planning level decisions (43 Code of Federal Regulations (CFR) Part 1610.5.2.). If necessary, a notice will be published in the *Federal Register*

requesting comments on significant changes made as a result of protest. Concurrently, the Governor of Colorado will review the document for consistency with approved state and local plans, policies, and programs.

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

All publications, including this report, newsletters, the draft RMP/EIS, and the Notice of Availability, will be published on the official GSFOKFO RMP Web site, at www.blm.gov/rmp/co/kfo-gsfo, once security upgrades are complete. In addition, pertinent dates regarding solicitation of public comments will be published on the Web site.

6.2 CONTACT INFORMATION

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

- Reviewing the progress of the RMP at the official GSFO/KFO RMP/EIS Web site (above), which will be updated with information, documents, and announcements throughout the duration of the RMP preparation; and
- Requesting to be added to or to remain on the official GSFO/KFO RMP project mailing list in order to receive future mailings and information.

Anyone wishing to be added to or deleted from the distribution list or requesting further information may e-mail a request to cormpkg@blm.gov or contact Joe Stout, RMP Project Manager at BLM, Kremmling Field Office, PO Box 68, Kremmling, CO 80459. Please provide your name, mailing address, and e-mail address, as well as your preferred method to receive information.

SECTION 7
REFERENCES

Bureau of Land Management (BLM) 2007. North-Central Colorado Community Assessment Report for the Bureau of Land Management Glenwood Springs Field Office and Kremmling Field Office. March 2007.

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APPENDIX A
NOTICE OF INTENT

The attached pages from the *Federal Register* include the NOI for the GSFO/KFO RMP/EIS. The NOI was published on March 2, 2007, and officially initiated the scoping process for the project.

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flexibility analysis if a rule would have a significant economic impact, either detrimental or beneficial on a substantial number of small entities. The proposed shooting closure does not pertain specifically to commercial or governmental entities of any size, but to public recreational use of specific lands. Therefore, the BLM has determined under the RFA that these interim supplementary rules would not have a significant economic impact on a substantial number of small entities.

Small Business Regulatory Enforcement Fairness Act (SBREFA)

This proposed shooting closure does not constitute a ''major rule'' as defined by U.S.C. 804(2). The proposed shooting closure merely contains rules of conduct for recreational use of certain public lands. The proposed shooting closure has no effect on business, commercial, or industrial use of the public lands.

Unfunded Mandates Reform Act

The proposed shooting closure does not impose an unfunded mandate on state, local, or Tribal governments in the aggregate, or the private sector, of more than $100 million per year; nor does it have a significant or unique effect on small governments. The propsed shooting closure does not require anything of state, local, or Tribal governments. Therefore, the BLM is not required to prepare a statement containing the information required by the Unfunded Mandates Reform Act (2 U.S.C. 1532 *et seq.*).

Executive Order 12630, Governmental Actions and Interference With Constitutionally Protected Property Rights (Takings)

The proposed shooting closure is not a government action capable of interfering with constitutionally protected property rights. The proposed shooting closure does not address property rights in any form, and does not cause the impairment of anybody's property rights. Therefore, the Department of the Interior has determined that this proposed shooting closure would not cause a taking of private property or require further discussion of takings implications under this Executive Order.

Executive Order 13132 Federalism

The proposed shooting closure will not have a substantial direct effect on the states, on the relationship between the national government and the states, or on the distribution of power and responsibilities among the various levels of government. The proposed shooting closure affects land in only one state, Nevada. Therefore, the BLM has determined that the proposed shooting closure does not have sufficient Federalism implications to warrant preparation of a Federalism Assessment.

Executive Order 12988, Civil Justice Reform

Under Executive Order 12988, the Office of the Solicitor has determined that the proposed shooting closure will not unduly burden the judicial system and that the requirements of sections 3(a) and 3(b)(2) of the Order are met. The proposed shooting closure includes rules of conduct and prohibited acts, but they are straightforward and not confusing, and their enforcement should not unreasonably burden the United States Magistrate who will try any persons cited for violating them.

Executive Order 13175, Consultation and Coordination With Indian Tribal Governments

In accordance with Executive Order 13175, the BLM has found that this proposed shooting closure does not include policies that have Tribal implications. The proposed shooting closure does not affect lands held for the benefit of Indians, Aleuts or Eskimos.

Paperwork Reduction Action

The proposed shooting closure does not contain information collection requirements that the Office of Management and Budget must approve under the Paperwork Reduction Act, 44 U.S.C. 3501 *et seq.* rules requiring special recreation permits for certain recreational users will involve collection of information contained on BLM Special Recreation Permit form 2930–1. This permit form has been approved under OMB Number 10004–0119.

Author

The principal author of these interim supplementary rules is Erika Schumacher, Chief Ranger, Las Vegas Field Office, Bureau of Land Management.

Closure Area

Public lands affected are within the following described area: Township 21 Range 53 Sections 14, 15, 22, 23, 24, 25, 26, 27, 34, 35, 36; Township 21 Range 54 Sections 21, 22, 27, 28, 29, 30 and 31, 32, 33, 34, Township 22 Range 53 Sections 1, 2 and 12; Township 22 Range 54 Sections 5, 6 and 7, Mount Diablo Meridian, Nevada.

Maps Depicting the area affected by this closure order are available for public inspection at the Las Vegas Field Office, Bureau of Land Management, 4701 N. Torrey Pines Drive, Las Vegas, Nevada.

Exceptions to Closure

a. Hunting with a valid state hunting license and in accordance with State laws, and

b. Law Enforcement personnel in the performance of their duties.

Closure Restrictions

Unless otherwise authorized, within the closure area no person shall:

a. Discharge any firearm.

b. Possess an unregistered firearm, when registration of a firearm is required by the State of Nevada or Nye County.

c. Possess an illegally obtained firearm.

d. Possess any firearm in violation of Federal, state or county regulations.

e. Unless specifically addressed by regulations set forth in 43 CFR, the laws and regulations of the State of Nevada and Nye County shall govern the use and possession of firearms. Such state and county laws and regulations, which are now or may later be in effect are hereby adopted and made part of this closure.

Definitions

Firearm: Any weapon capable of firing a projectile including but not limited to rifle, shotgun, handgun, BB-gun, pellet gun, etc.

This closure is issued under the authority of 43 CFR 8364.1. Violations of any terms, conditions, or restrictions contained in this closure order, may subject the violator to citation or arrest, with penalty of fine and imprisonment or both as specified by law.

Juan Palma,

Field Manager, Las Vegas Field Office.

[FR Doc. E7–3642 Filed 3–1–07; 8:45 am]

BILLING CODE 4310–40–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[CO–120–1610–DO–022C]

Notice of Intent to Prepare a Resource Management Plans for the Kremmling and Glenwood Springs Field Office and Associated Environmental Impact Statement, Colorado

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of intent.

SUMMARY: The Bureau of Land Management (BLM) Kremmling and Glenwood Springs Field Office, Colorado intends to prepare Resource

Management Plans (RMP) with an associated Environmental Impact Statement (EIS) for the Kremmling and Glenwood Springs planning areas and by this notice is announcing public scoping meetings. The Field Offices will simultaneously revise their respective RMPs for the BLM-administered public lands within each Field Office under one EIS. The RMPs will replace the existing Kremmling and Glenwood Springs RMPs.

DATES: This notice initiates the public scoping process. Comments and resource information should be submitted to the BLM within 60 days of publication of this notice in the **Federal Register**. The BLM will announce public scoping meetings to identify relevant issues through local news media, newsletters, and the BLM Web site (*http://www.blm.gov/rmp/co/kfo-gsfo*) at least 15 days prior to the first meeting.

ADDRESSES: You may submit written comments by any of the following methods:

- *Web site:* (*http://www.blm.gov/rmp/co/kfo-gsfo*).
- *E-mail: cormpkg@blm.gov.*
- *Fax:* (970) 724–9590.
- Bureau of Land Management, Kremmling Field Office, Joe Stout, RMP Project Manager, P.O. Box 68, Kremmling, CO 80459.

Documents pertinent to this proposal may be examined at the Kremmling and Glenwood Springs Field Offices. Respondents' comments, including their names and street addresses, will be available for public review at the Kremmling Field Office during regular business hours from 8 a.m. to 4:30 p.m., and at the Glenwood Springs Field Office during regular business hours from 7:45 a.m. to 4:30 p.m., Monday through Friday, except holidays, and may be published as part of the EIS. Individual respondents may request confidentiality. If you wish to withhold your name or street address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your written comments. Such requests will be honored to the extent allowed by law. All submissions from organizations and businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be available for public inspection in their entirety.

FOR FURTHER INFORMATION CONTACT: For further information and\or to have your name added to our mailing list, contact Joe Stout, Kremmling Field Office, at (970) 724–3003. Comments may be sent electronically to *cormpkg@blm.gov.*

SUPPLEMENTARY INFORMATION: The Kremmling planning area is located in Grand, Eagle, Jackson, Larimer, and Summit Counties, Colorado. The Glenwood Springs planning area is located in Eagle, Garfield, Mesa, Pitkin, Rio Blanco, and Routt Counties, Colorado. This planning activity encompasses approximately 964,000 acres of BLM-administered public lands. The plan will fulfill the needs and obligations set forth by the National Environmental Policy Act, the Federal Land Policy and Management Act, and BLM management policies. The BLM will work collaboratively with interested parties to identify the management decisions that are best suited to local, regional, and national needs and concerns.

The purpose of the public scoping process is to determine relevant issues that will influence the scope of the environmental analysis and alternatives. These issues also guide the planning process. You may submit comments on issues and planning criteria in writing to the BLM at any public scoping meeting, or you may submit them to the BLM using one of the methods listed in the **ADDRESSES** section above. Individual respondents may request confidentiality. If you wish to withhold your name or street address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your written comments. Such requests will be honored to the extent allowed by law. All submissions from organizations and businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be available for public inspection in their entirety.

Preliminary issues and management concerns have been identified by BLM personnel, other agencies, and in meetings with individuals and user groups. They represent the BLM's knowledge to date regarding the existing issues and concerns with current land management. The EIS will describe and analyze a range of alternatives, comprised of the No Action alternative (continued management) and a number of action alternatives, each of which will describe options for addressing the major issues. The major issues that will be addressed in this planning effort include:

- Oil and gas development;
- Range health/upland management;
- Water/riparian issues;
- Increased recreation demands and uses;
- Comprehensive travel management and transportation;
- High concentration of cultural sites;
- Maintaining habitat for Sage Grouse and Sagebrush obligate species; and
- Rapidly expanding urban interface areas.

Issues identified through public comments will be placed into one of four categories:

1. Issues to be resolved in the plan;
2. Issues to be resolved through policy or administrative action;
3. Issues beyond the scope of the plan; or
4. Issues that have already been addressed but should be better communicated to the issue holder.

Rationale will be provided for each issue placed in categories two, three, and four. The public is encouraged to help identify these questions and concerns during the scoping phase.

An interdisciplinary approach will be used to develop the plan in order to consider the variety of resource issues and concerns identified. Disciplines involved in the planning process will include specialists with expertise in minerals and geology, forestry, range, fire and fuels, outdoor recreation, archaeology, paleontology, wildlife, fisheries, lands and realty, hydrology, soils, sociology, environmental justice and economics.

The following planning criteria have been proposed to guide development of the plan, avoid unnecessary data collection and analyses, and to ensure the plan is tailored to the issues. Other criteria may be identified during the public scoping process. After gathering comments on planning criteria, the BLM will finalize the criteria and provide feedback to the public on the criteria to be used throughout the planning process. Some of the planning criteria that are under consideration include:

- The plans will be completed in compliance with the Federal Land Policy and Management Act (43 U.S.C. 1701 *et seq.*) and the National Environmental Policy Act.
- The plan will recognize valid existing rights.
- Public participation will be encouraged throughout the process. The BLM will collaborate and build relationships with tribes, state and local governments, federal agencies, local stakeholders and others in the community of interest of the plan as normal business.

Dated: November 8, 2006.

Peter McFadden,

Acting Kremmling Field Manager.

Dated: November 9, 2006.

Jamie Connell,

Glenwood Springs Field Manager.

[FR Doc. E7–3627 Filed 3–1–07; 8:45 am]

BILLING CODE 1610–DO–P

DEPARTMENT OF JUSTICE

[OMB Number 1105–0030]

Justice Management Division, Office of Attorney Recruitment and Management: Agency Information Collection Activities: Proposed Revision to Previously Approved Collection; Comments Requested

ACTION: 30-Day Notice of Information Collection Under Review: Electronic Applications for the Attorney General's Honors Program and the Summer Law Intern Program.

The U.S. Department of Justice (DOJ), Justice Management Division, Office of Attorney Recruitment and Management (OARM), has submitted the following information collection request for review and clearance in accordance with the Paperwork Reduction Act of 1995. Office of Management and Budget (OMB) approval is sought for the information collection listed below. This proposed information collection was previously published in the **Federal Register** on December 26, 2006, Volume 71, Number 247, pages 77411–77412, allowing for a 60-day public comment period.

The purpose of this notice is to allow an additional 30 days for public comment until April 2, 2007. This process is conducted in accordance with 5 CFR 1320.10.

Written comments and/or suggestions regarding the item(s) contained in this notice, especially regarding the estimated public burden and associated response time, should be directed to the Office of Management and Budget, Office of Information and Regulatory Affairs, *Attention:* Department of Justice Desk Officer, Washington, DC 20530. Additionally, comments may be submitted to OMB via facsimile to 202–395–7285. Comments may also be submitted to the Department Clearance Officer, United States Department of Justice, Suite 1600, 601 D Street, NW., Washington, DC 20530.

Written comments and suggestions from the public and affected agencies should address one or more of the following four points:

(1) Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;

(2) Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;

(3) Enhance the quality, utility, and clarity of the information to be collected; and

(4) Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, *e.g.*, permitting electronic submission of responses.

Overview of this Information Collection:

(1) *Type of Information Collection:* Revision of a Currently Approved Collection

(2) *Title of the Form/Collection:* Electronic Applications for the Attorney General's Honors Program and the Summer Law Intern Program.

(3) *Agency form number, if any, and the applicable component of the Department sponsoring the collection:* Form Number: none. Office of Attorney Recruitment and Management, Justice Management Division, U.S. Department of Justice.

(4) *Affected public who will be asked or required to respond, as well as a brief abstract: Primary:* Individuals or households. *Other:* None. The application form is submitted voluntarily once a year by law students and judicial law clerks, who will be in this applicant pool only once; the revision to this collection concerns two additional forms required to be submitted only by those applicants who were selected to be interviewed by Department components. These forms seek information in order to prepare both the official Travel Authorizations prior to the interviewees' performing pre-employment interview travel (as defined by 41 CFR 301–1.3), and the official Travel Vouchers after the travel is completed. The first new form is the Travel Survey—used by the Department in scheduling travel and/or hotel accommodations, which in turn provides the estimated travel costs required by the Travel Authorization form. The second new form is a simple Reimbursement Form—the interviewees are asked to provide their travel costs and/or hotel accommodations (if applicable) in order for the Department to prepare the Travel Vouchers required before these interviewees can be reimbursed by the Department for the authorized costs they incurred during this pre-employment interview travel.

(5) *An estimate of the total number of respondents and the amount of time estimated for an average respondent to respond/reply:* It is estimated that 5000 respondents will complete the application in approximately one (1) hour per application. The revised burden would include 600 respondents who will complete the travel survey in approximately 10 minutes per form, and 600 respondents who will complete the reimbursement form in approximately 10 minutes per form.

(6) *An estimate of the total public burden (in hours) associated with the collection:* The estimated revised total annual public burden associated with this application is 5200 hours.

If additional information is required, contact Lynn Bryant, Department Clearance Officer, United States Department of Justice, Justice Management Division, Policy and Planning Staff, Patrick Henry Building, Suite 1600, 601 D Street, NW., Washington, DC 20530.

Dated: February 26, 2007.

Lynn Bryant,

Department Clearance Officer, PRA, Department of Justice.

[FR Doc. E7–3634 Filed 3–1–07; 8:45 am]

BILLING CODE 4410–PB–P

DEPARTMENT OF JUSTICE

Federal Bureau of Investigation

[OMB Number 1110–0006]

Agency Information Collection Activities: Proposed Collection, Comments Requested

ACTION: 30-day notice of information collection under review: Revision of a currently approved collection law enforcement officers killed or assaulted.

The Department of Justice, Federal Bureau of Investigation, Criminal Justice Information Services Division will be submitting the following information collection request to the Office of Management and Budget (OMB) for review and clearance in accordance with established review procedures of the Paperwork Reduction Act of 1995. The proposed information collection is published to obtain comments from the public and affected agencies. This proposed information collection was previously published in the **Federal**

APPENDIX B
BLM COMMENT FORM

The BLM comment form that follows was part of the scoping packet distributed at the public scoping meetings held at several locations in April 2007. The form was also provided on-line at the project website. Sixty-five percent of the respondents used this form to provide comments to the BLM.

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USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name _____ Date _____

Mailing Address _____City/State/Zip _____

Telephone (optional) _____ E-Mail Address (optional) _____

Would you like to be added to this project's mailing list to receive future project-related information? Yes No

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

Individual (no affiliation) Private Organization Citizen's Group

Federal, State, or Local Government Elected Representative Regulatory Agency

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

The BLM wants to hear from you!

The Kremmling and Glenwood Springs Field Offices are committed to listening to and learning from our neighbors, friends, and stakeholders, each of whom belong to a *community of interest* defined by a common concern for the future of our public lands. Your answers to the following questions will be helpful at this point in the planning process, as are any other comments. Thank you for taking the time to provide your input.

1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

(Continue your comments on the other side.)

Public comments submitted, including names and street addresses of respondents, will be available for public review at the Glenwood Springs and Kremmling Field Offices during regular business hours (8:00 AM to 4:30 PM), Monday through Friday, except holidays. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be made available for public inspection in their entirety.

3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

4) Any other issues, comments, or suggestions?

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

Place First Class Stamp Here

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

APPENDIX C
NEWSPAPER ADVERTISEMENTS

An advertisement was published in the following newspapers to notify the public of the project, to announce the open houses, to solicit public comments, and to provide contact information:

- *The Daily Sentinel,* Grand Junction, Colorado (Sunday, April 1, 2007);
- *Jackson County Star,* Walden, Colorado (Thursday, April 5, 2007);
- *Middle Park Times,* Kremmling, Colorado (Tuesday, April 3, 2007);
- *Ski-Hi News,* Granby, Colorado (Thursday, April 5, 2007);
- *Post Independent*, Glenwood Springs, Colorado (Sunday, April 1, 2007);
- *Vail Daily,* Vail, Colorado (Sunday, April 1, 2007);
- *Summit Daily News,* Breckenridge, Colorado (Sunday, April 1, 2007); and
- *Aspen Times Daily,* Aspen, Colorado (Sunday, April 1, 2007).

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PUBLIC NOTICE
Open Houses for Resource Management Plans for BLM Kremmling and Glenwood Springs Field Offices

The U.S. Department of the Interior, Bureau of Land Management (BLM), Kremmling and Glenwood Springs Field Offices (FOs) are jointly revising their Resource Management Plans (RMPs). The two FOs are simultaneously revising their RMPs for BLM-administered public lands under one Environmental Impact Statement (EIS). The original plans were completed in 1984. The BLM asks the public to help identify issues to be addressed in the RMP revisions and to offer potential solutions. The BLM seeks ideas about uses of these public lands, possible protection, and recommendations on special designations. The BLM will use the information it receives during scoping as it prepares the Draft RMP revisions and associated Draft EIS.

The BLM will host six open houses to share information and accept written comments. The open houses in Rifle, Carbondale, and Gypsum will focus on lands managed by Glenwood Springs FO, and those in Granby, Kremmling, and Walden will focus on lands managed by Kremmling FO. The public is invited to visit between 4 and 7 pm:

Date	Location	Address
Tuesday, April 10	Rifle	Rifle Fire Protection District – Station 1, 1850 Railroad Ave
Tuesday, April 10	Granby	Granby Community Center, 129 3rd St
Wednesday, April 11	Carbondale	Town of Carbondale – Community Rm #2, 511 Colorado Ave
Wednesday, April 11	Kremmling	CSU Extension Hall, 210 11th St
Thursday, April 12	Gypsum	Town Hall – Council Chambers, 50 Lundgren Blvd
Thursday, April 12	Walden	Wattenburg Center, 686 County Road 42

For additional information related to the Kremmling FO, contact Joe Stout at 970/724-3003, or, related to the Glenwood Springs FO, contact Brian Hopkins at 970/947-2840. Written comments will be accepted through May 2, 2007, by either: (1) mail to BLM, Kremmling FO, Joe Stout, RMP Project Manager, PO Box 68, Kremmling, CO 80459; or (2) e-mail to cormpkg@blm.gov. More information is available at www.blm.gov/rmp/co/kfo-gsfo.

APPENDIX D
NEWSPAPER ARTICLES

The following are example newspaper articles that were published relevant to the scoping effort.

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Vail Daily

Who gets to use federal land in Colo.?

Work is starting on mapping out the future of nearly 1 million acres of public land

Judith Kohler
Vail, CO Colorado
March 13, 2007

Natural gas drilling dots the landscape beneath the Roan Plateau near Rifle. The federal Bureau of Land Management is working on a plan to determine who will get use swaths of its land in western Colorado.
Peter M. Fredin/AP File Photo

Click to Enlarge

Browse Vail Daily Photos

DENVER — (AP) Work is starting on mapping out the future of nearly 1 million acres of public land in western and north-central Colorado that encompass major recreational, wildlife and energy development areas.

The Bureau of Land Management will write a joint plan for managing the federal land overseen by two of its offices: Glenwood Springs and Kremmling. The resource management plan will cover the agency's land in all or part of 10 counties and will update documents first written in 1984.

"This is what we use to set the stage for everything we do," agency spokesman David Boyd said.

The document will provide a framework within which specific projects will be considered, he added.

The area has gone through big changes since the last comprehensive plans were completed. The population is growing in western Colorado and so is recreation on the public lands. Some of the country's largest deer and elk herds roam the area, making it a nationally prized hunting spot.

State figures show that Garfield County, one of the centers of Colorado's natural gas boom, accounted for about 31 percent of the nearly 6,000 drilling permits approved statewide last year.

But some of the area's most intense energy development is outside the purview of the Glenwood Springs and Kremmling offices.

Share your opinions

The Kremmling and Glenwood Springs offices of the Colorado Bureau of Land Management are sponsoring the following open houses and public meetings to solicit comments on a new resource management plan for nearly 1 million acres of public land in western and north-central Colorado:

• April 10, Rifle, Rifle Fire Protection District, Station 1, 1850 Railroad Ave.

• April 10, Granby, Granby Community Center, 129 Third St.

• April 11, Carbondale, Town of Carbondale Community Room No. 2, 511 Colorado Ave.

Boyd said only about a fifth of the 567,000 acres managed by the Glenwood Springs office involves some of the region's busiest drilling. Much of that land, west of Silt, has already been leased and about 1,000 wells have been drilled.

The new plan will include revised drilling projections.

The plan will also cover 378,000 acres managed by the Kremmling office and a total of nearly 1.4 million acres of subsurface minerals. Some of those minerals are under private land.

The bureau is sponsoring open houses starting April 10 to hear what the public thinks should be in the plan. The deadline for comments is May 2.

"It really is important for folks to get involved as early as possible," Boyd said.
It could take a couple years or more to complete the plan. The bureau will take more public comment as the document is developed.

• April 11, Kremmling, Colorado State University Extension Hall, 210 11th St.

• April 12, Gypsum, Town Hall, council chambers, 50 Lundgren Blvd.

• April 12, Walden, Wattenburg Center, 686 County Road 42.
— Associated Press

Clare Bastable, conservation director of the Colorado Mountain Club, said combining the plans by the two field offices makes sense.

"It really forces the agency to look at the broad scale and the broad impacts that exist in both field offices," said Bastable, a member of the Colorado bureau's Northwest Resource Advisory Council.

Bastable said it will be important for the agency to closely analyze the potential for energy development and its social and economic impacts.

"We see the Kremmling field office as having a lot of recreation potential," Bastable said. "It's just an incredibly beautiful mountainous area."

On the Net:
Kremmling and Glenwood Springs resource management plan revisions: http://www.blm.gov/rmp/co/kfo-gsfo/

BACK

Post Independent

BLM to hold public meetings on land use plan revision

Donna Gray
Glenwood Springs, CO Colorado
March 14, 2007

GLENWOOD SPRINGS, Colo. — As the Bureau of Land Management gears up to revise its 1984 comprehensive land plans for the Glenwood Springs and Kremmling field offices, it's looking for public comments on what issues should be included in the new plan. Public scoping sessions are scheduled for Tuesday, April 10, in Rifle and Wednesday, April 11, in Carbondale.

Much has changed in both field areas in the interim.

"Generally (BLM) likes to update or revise them every 15 to 20 years," said BLM Glenwood Springs community planner Brian Hopkins. "Enough changes in that timeframe. That's generally what we plan for."

One issue the BLM is not planning to address in depth at this point is oil and gas development, which has taken place primarily in the western portion of the land overseen by the Glenwood Springs field office.

Most of the lands designated for development have been leased.

"Once an area gets leased it's leased, that's what happened here," Hopkins said. "BLM (land) has been leased, the Roan (Plateau) has been through its process, so from the standpoint that a lot of those decisions have been made or will be made through the Roan planning process, the RMP revision will be less intensive from a gas standpoint."

Issues of interest to BLM in the revision will include recreation, travel management, "visual aesthetics and the urban wildland interface" where growing communities have expanded adjacent to BLM lands creating impacts on wildlife and problems in fighting wildfires.

Local conservation groups, however, plan to press BLM to consider growing oil and gas development in its new plan.

"We want to get a sense for where they're headed," said Wilderness Workshop Executive Director Sloan Shoemaker. "I can make some assumptions based on the pattern we've seen that BLM has turned into basically a single-use agency rubber stamping oil and gas permits. We want make sure they don't forget (other uses) and that they don't turn over all these lands to oil and gas development."

Shoemaker said his group is also concerned about the degradation of air quality from oil and gas operations especially over the Flat Tops Wilderness Area east of the gas patch in western Garfield County. Wilderness areas and national parks in the state are federally designated as Class One air quality areas.

"These are supposed to be pure air," he said. "Anyone who's driven up and down I-70 in the past few years is aware of (air) degradation."

Shoemaker also said he'd like to see BLM follow the White River National Forest's approach to travel management, which it wrote into its revised forest plan several years ago.

Meeting schedule

The Bureau of Land Management will hold public meetings for its revised Resource Management Plan for the Glenwood Springs and Kremmling field offices. The meetings will run from 4-7 p.m.

- Tuesday, April 10, Rifle Fire Station, 1850 Railroad Ave.
- Wednesday, April 11, Carbondale Town Hall, 511 Colorado Ave.
- Thursday, April 12, Gypsum Town Hall, 50 Lundgren Blvd.

"Travel management is always a lightning rod issue. We'd like to see BLM designate routes only as the Forest Service did, with some separation of uses where appropriate, so quiet uses are protected."

Western Colorado Congress will also be looking for BLM to consider energy development in its new RMP.

"I think that the wildlife management guidelines of the Colorado Mule Deer Association that came up with (Rep.) Dan Gibbs' House Bill 1298 that requires directional drilling and limits the number of roads to reduce impact wildlife ... that would be something we'd like to see BLM address," said Patrick Barker, community organizer in Glenwood Springs for Western Colorado Congress.

BLM will take public comments until May 2. For more information call Joe Stout, planning and environmental coordinator, (970) 724-3003 or go to: http://www.blm.gov/rmp/co/kfo-gsfo.

Contact Donna Gray: 945-8515, ext. 16605

dgray@postindependent.com

Post Independent, Glenwood Springs Colorado CO

BACK

Monday

FREE

Grand County
The Daily Tribune

Fraser • Granby • Grand Lake • Hot Sulphur Springs • Kremmling • Parshall • Tabernash • Winter Park, Colorado Monday, April 9, 2007 Volume 14, Number 201

www.grandcountynews.com

Voice your views on land use

BLM hosting open houses in Granby & K-town this week

Your access to public lands for recreation, water and grazing rights, rights-of-way, forest management, wildlife habitat and much more will be determined as a result of the public meetings being held this week by the Bureau of Land Management (BLM).

The BLM's Glenwood Springs and Kremmling field offices are encouraging the public to attend one of the six open houses scheduled around the region this week, including two of them in Kremmling and Granby. The purpose of the open houses is to help identify issues arising from the field offices' revisions to the Resource Management Plan.

"These Resource Management Plans will guide the management of nearly one million acres for the next two decades," said Acting Kremmling BLM Field Manager Peter McFadden. "This planning effort gives the public a great opportunity to influence how the lands in these two field offices will be managed over the next 20 years."

Every area of Grand County will be affected by the decisions being made on the future management of BLM, including communities such as Granby.

"Granby has BLM lands around it in all directions," said David Boyd, public affairs specialist at the BLM's regional headquarters in Glenwood Springs. "These lands provide important local areas for recreation, viewsheds from town, grazing for local ranchers, to name a few. Decisions made during this planning effort will determine how these lands are managed for the next two decades, which will have a direct effect upon the residents of Granby."

On Tuesday, April 10, the first of the open houses will be held at the Granby Community Center at 129 Third Street. A second open house will follow on Wednesday, April 11 at the CSU Extension Hall, 210 11th Street in Kremmling.

The format of the open houses will allow community members to stop by anytime between 4 p.m. and 7 p.m. to talk to BLM specialists, learn more about the revisions and provide comments.

"We will be looking at very important issues," Boyd said. "These include access to public lands, realty actions

Continued on Page 3

BLM wants public's views on local land use issues

Continued from Page 1

such as rights-of-way and lands available for exchange, forest management, fire management, grazing, mineral development, recreation and wildlife habitat. BLM lands are under pressure like never before, and it's important that people come and share their concerns and ideas with us."

The four other BLM open houses being held around the region this week are:

- Tuesday, April 10, Rifle, Rifle Fire Protection District - Station 1, 1850 Railroad Avenue
- Wednesday, April 11, Carbondale, Town of Carbondale - Community Room #2, 511 Colorado Avenue
- Thursday, April 12, Gypsum, Town Hall - Council Chambers, 50 Lundgren Blvd.
- Thursday, April 12, Walden, Wattenburg Center, 686 County Road 42.

BLM officials say they hope to "scope" the public views on the use of public lands and the plan to manage them. The open houses are designed to help the public provide comments and information before BLM begins drafting the plan revisions. It will be the first of several opportunities for the public to become involved in the process.

"It's very important to hear from the public before we begin drafting these plan revisions," said Jamie Connell, Glenwood Springs BLM field manager. "We want to consider their concerns from the very beginning. The public may also provide additional information we don't have."

Attendance at these open houses is not required to submit scoping comments to BLM. That federal agency will accept public scoping comments through May 2, 2007.

"BLM truly wants to hear from the public," Boyd said. "This will help us identify issues and gain information we might not have. We want to hear these things before we actually start drafting the plan revision. When we have the revision drafted, it will be released for another round of public review and comment."

For further information on these plan revisions log on to: http://www.blm.gov/rmp/co/kfo-gsfo, or contact Joe Stout, Planning and Environmental Coordinator, at 970-724-3003. The Resource Management Plan Revisions are expected to be complete in 2009.

Post Independent

Area streams, Glenwood Canyon, meet criteria for wild and scenic designation

Donna Gray
Glenwood Springs, CO Colorado
March 30, 2007

GLENWOOD SPRINGS, Colo. — A Bureau of Land Management report issued this week has identified Glenwood Canyon and several streams in the region as eligible for wild and scenic river designation. Like wilderness areas, free-flowing wild and scenic rivers have special federal protection.

According to the report, BLM prepared the study in conjunction with a major revision of the 1984 resource management plans for both the Glenwood Springs and Kremmling field offices.

"The eligibility list gives us a list of river and steam segments within our boundaries with regionally or nationally significant values," said Glenwood Springs BLM field manager Jamie Connell. "We will now use this information to conduct a suitability study to determine whether a stream segment would make a worthy addition to the national Wild and Scenic Rivers system."

Currently, a portion of the Cache la Poudre River near Fort Collins is the only river section in the state to be designated as wild and scenic, said BLM spokesman David Boyd.

The Wild and Scenic Rivers Act of 1968 established a federal system for protecting free-flowing waters.

In its study, BLM found 11 areas that meet the eligibility criteria, including scenic, geological, historic, recreation and fishery values. Among the areas found to have significant values were Glenwood Canyon and portions of No Name, Mitchell and Thompson creeks.

Although most of Glenwood Canyon is within the White River National Forest, some is on BLM land, Boyd said. The report identified as eligible three miles of the Colorado that flows through BLM land.

According to the report, Glenwood Canyon "is the largest canyon of its kind on the Upper Colorado River. The canyon is widely considered one of the most scenic natural features on the Interstate Highway System of the United States."

It also has outstanding geological values. Its 1,000-foot walls reveal the full range of earth's geologic eras from the very earliest Precambrian period beginning 4,500 million years ago.

Also identified as eligible for wild and scenic river designation was No Name Creek for its historic flume and aqueduct that were part of an early twentieth century water system that powered one of the earliest hydroelectric plants in the country in Glenwood Springs.

A part of Mitchell Creek was also recognized for its population of genetically pure cutthroat trout, which, along with other trout species, has been decimated by whirling disease elsewhere throughout the state.

BLM considered Thompson Creek south of Carbondale as having special geologic values for its colorful sandstone "fins" and the proximity of the historic Aspen and Western Railroad which served the early coal mines between Carbondale and Crystal City.

The agency will now determine if these areas are suitable for wild and scenic river designation, Boyd said. "We will

incorporate stakeholders" (in the process) and determine if this "is the best way to protect these values."

He also pointed out that Congress must make the final determination of wild and scenic rivers status.

Contact Donna Gray: 945-8515, ext. 16605
dgray@postindependent.com

Post Independent, Glenwood Springs Colorado CO

BACK

SUMMIT DAILY NEWS

'Wild and scenic' for Blue River?

BY BOB BERWYN
summit daily news
April 7, 2007

Summit Daily file photo Parts of the Blue River between Green Mountain Reservoir and the Colorado River are eligible for "Wild and Scenic" status based on "outstanding remarkable values and the free-flowing nature of the rivers," according to the Bureau of Land Management.

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SUMMIT COUNTY - Local anglers and boaters no doubt already appreciate the wild and scenic qualities associated with the Blue River north of Green Mountain Reservoir, as well as the magnificent canyon country of the Upper Colorado.

But significant sections of those streams are getting a whole new level of recognition through a formal study conducted by the Bureau of Land Management (BLM). A new report identifies parts of the Blue and Colorado as eligible for wild and scenic river status, based on "outstanding remarkable values and the free-flowing nature of the rivers.

It may be surprising, given the number of beautiful waterways, but Colorado only has one formally designated wild and scenic river - a 30-mile section of the Cache La Poudre between Rocky Mountain National Park and Fort Collins.

But the latest study by the BLM only sets the stage for wild and scenic river status, which must be designated by Congress.

"It's a long process," said Joe Stout, the BLM planner leading the effort out of the Kremmling field office.

But even just the fact that they are eligible immediately gives those waters some level of interim protection. The BLM must now manage them to maintain those outstanding qualities identfied by the study, Stout said.

Stout said that several sections of the Blue River between Green Mountain Reservoir and the Colorado River are eligible, as is the heavily used section of the Colorado between Gore Canyon and State Bridge Lodge, visited by 40,000 to 50,000 people per year.

The next phase of the study is a suitability analysis. This is when the BLM, with plenty of public input, tries to figure out if they can manage the river reaches in question in accordance with the high standards of the Wild Scenic River designation.

Stout said the suitability analysis will be done as part of an overall update of the BLM land use plan for this region. The wild and scenic river information, as well as the land use plan revision, will be discussed at a series of upcoming scoping meetings, including April 11 in Kremmling.

For the full wild and scenic river report, related documents and a detailed schedule of meetings, go to http://www.blm.gov/rmp/co/kfo-gsfo/river_study.htm.

Bob Berwyn can be reached at (970) 331-5996, or at bberwyn@summitdaily.com.

BLM scoping sessions on wild and scenic rivers and land use plan, 4 p.m. to 7 p.m.

April 10: Rifle Fire Protection District, 1850 Railroad Ave.

April 10: Granby Community Center, 129 3d Street

April 11: Town of Carbondale Community Room 2, 511 Colorado Avenue

April 11: Kremmling, CSU Extension Hall, 210 11th Street

April 12: Gypsum, Gypsum Town Hall, council chambers, 50 Lundgren Blvd.

April 12: Walden, Wattenburg Center. 686 County Road 43

BACK

Aspen Daily News
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Climbers, BLM reach for compromise at Thompson Creek

David Frey - Aspen Daily News Correspondent

Thu 06/07/2007 08:01PM

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CARBONDALE -- The raw beauty of the rocky fins that tower over Thompson Creek is part of what has made the area a recent magnet for rock climbers.

Those same stunning spires prompted the Bureau of Land Management to set aside the land as a spot for solitary visitors and prompted environmentalists to seek to protect it as wilderness.

These varying visions for the same landscape have created controversy over what has become a hot climbing spot in the past year, but an agreement between climbers and the BLM seeks to keep everybody satisfied.

"It's a really cool cliff," said Carbondale rock climber B.J. Sbarra. "It's a really unique climbing resource. There's nothing like it nearby."

The series of rock fins along a remote trail west of Carbondale had been largely ignored by rock climbers until last summer when a group of climbers bolted about 45 routes up one of the rock faces.

The bolts opened up climbers' access to a group of challenging routes that they couldn't climb before. The solid rock didn't have the sort of cracks climbers need to put in removable protection to clip their ropes into.

Over the summer, the spot became a sensation for valley climbers who otherwise had longer hauls to reach good climbing areas -- places like Rifle Mountain Park and Independence Pass.

Ordinarily, drilling bolts is allowed on BLM land. But the agency considers Thompson Creek an area of critical environmental concern. That doesn't necessarily mean that bolts are prohibited, said Brian Maiorano, outdoor recreation planner for the BLM, but because the special designation was put in place largely to protect those rock outcroppings, the bolts seemed to defeat the purpose.

The agency considered asking the climbers to pull out all but a handful of routes.

"What we feared was that having 45 bolted routes there was going to attract a large number of climbers, and people who currently use Thompson Creek for little day hikes and a stroll along the creek and are expecting that primitive setting were suddenly going to be seeing a lot of people," Maiorano said.
Meanwhile, the BLM is revising its resource management plan for the entire Glenwood Springs field office region. That could change the use of the area completely, from sealing off climbing there altogether to making it wide open.

Climbers are hoping for full access.

"Our hope is that in the long run, it's recognized by the BLM as an important local resource for climbers in the area," Sbarra said.
But in the short term, climbers have agreed to some concessions to keep a foothold in the area. When the area opened this spring, climbers agreed to disable about half of the bolted routes and restrict access to just nine climbers at a time, with a sign-in sheet at the trailhead to let climbers know how full the area is when they show up. The restriction is voluntary, but climbers and agency officials say it seems to be working.

On a recent weekend, Sbarra said, a park ranger noticed too many climbers at the area and set out to talk to them. On the way, he ran into four leaving after other climbers told them they shouldn't be there.

"They turned around and left," he said. "That was very encouraging."

The appearance of the bolts last summer also worried some wilderness advocates, who feared the human improvements could jeopardize the area's ability to receive special wilderness protections. It was included in a previous wilderness bill proposed by Rep. Diana DeGette, and the Wilderness Workshop has included it in its latest proposal for wilderness expansion.

"Looking into it further we decided that there are many instances where there are lots of bolted climbing occurring in existing wilderness areas," said Sloan Shoemaker, director of the Wilderness Workshop. "Bolted climbing is not in any way a deterrent in getting wilderness designation. It's not about the bolts themselves but about the level of use that occurs. So that's what we're in discussion with the climbing community and the BLM about.

"It's just figuring out how to meet everybody's needs. They want to have continued access to that climbing attraction and that's fine with us. We just want to figure out a way that the amount of use doesn't impair wilderness values."

Sbarra and other climbers were already forming the Roaring Fork Climbers Coalition to advocate for climbing access. At a recent event, organizers stressed the restriction to climbers.

Thompson Creek has become a popular after-work spot for climbers, he said, a convenient place to train on a variety of different routes. But it's not so popular on weekends, Sbarra said, when climbers head off to bigger areas. Compared to Independence Pass and Rifle, which each have hundreds of routes, Thompson Creek is small-time, he said. Most of the fins have rock that's too soft for climbing bolts. Only one seems to work, he said.

"It's not going to be a headline in Boulder: 'Awesome cliff discovered in Carbondale. Check it out!'" Sbarra said.

But it has helped unify midvalley climbers who often didn't run into each other on outings.

"There really wasn't a spot where everybody would go," he said.
"You'd go out on Tuesday night and there'd be 10 or 15 of your buddies out there."

Because the climbing spot is removed from the main trail, Sbarra said he's hopeful climbers can continue there without disrupting the solitude hikers are seeking.

Shoemaker said he'd like to find a balance between users.

"You know, climbers are wilderness supporters, too," he said, "and part of the attraction of that area is the wild character of it. That's what they like. It's off the beaten track. It's beautiful. It's wild."

dfrey@aspendailynews.com

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APPENDIX E
LIST OF COMMENTORS

Below is a list of the one hundred five commentors who sent written submissions to the BLM for the GSFO/KFO RMP/EIS as part of the public scoping process. Name, affiliation, and date submitted are included. The commentors are listed by the date submitted in chronological order.

The formal scoping process began on March 2, 2007, with the publication of the NOI in the *Federal Register* (Appendix A). The scoping period continued for 60 days until May 2, 2007. However, written submissions received through June 16, 2007, were evaluated and are included in this report. The list of 105 commentors who submitted written comments follows. This list may be used to facilitate identification of a specific submission in Appendix E, Written Scoping Submissions.

List of Commentors

Name		Affiliation	Date Submitted
Businesses			
James	McDaniel	Good Chance Guided Hunts	May 1, 2007
Andrew	Miller	Lonesome Hut LLC	January 15, 2007
Michael S.	Paules	Williams Exploration & Production	May 1, 2007
Jason B.	Price	Summo USA Corporation	May 1, 2007
Kathleen	Sgamma	Independent Petroleum Association of Mountain States	May 2, 2007
Counties			
Debra	Campbell	Grand County Department of Planning and Zoning	April 27, 2007
Jennifer	Murray	Grand County Department of Road & Bridge, Division of Natural Resources	May 7, 2007

List of Commentors (*continued*)

Name		Affiliation	Date Submitted
Elected Officials			
Thomas	Clark	Mayor, Town of Kremmling	May 9, 2007
Sara	Fisher	Eagle County Board of County Commissioners	May 1, 2007
Arn	Menconi		
Peter	Runyon		
Lurline	Underbrink Curran	Grand County Board of Commissioners	May 2, 2007
Federal Agencies			
Doreen	Sumerlin	US Forest Service	April 10, 2007
Larry	Svoboda	US Environmental Protection Agency	May 16, 2007
Individuals			
Johann	Aberger		April 16, 2007
B.S.	Achau		March 23, 2007
Jeff	Achey		April 27, 2007
Mike	Armstrong		April 26, 2007
Mike	Atchel		May 1, 2007
John	Bailey		May 1, 2007
Michael	Benge		April 27, 2007
Jack	Bombardier		April 17, 2007
Matt	Booth		April 28, 2007
Ellie	Caryl		May 11, 2007
Lucy	Cerise		April 11, 2007
Jerry	Claassen		April 30, 2007
Jeremy	Cohen		April 26, 2007
	Confidential		April 30, 2007
Bob	Cornez		April 27, 2007
Individuals *(continued)*			
Megan	Dean		April 13, 2007
John	DiCuollo		May 1, 2007
David	Downing		April 26, 2007
Bob	Egizi		April 27, 2007
Charles M.	Fuller		May 2, 2007
George	Fuller		April 30, 2007
Leslie	Fuller		April 30, 2007
Cassia	Furman		April 30, 2007
Derek	Hanrahan		April 28, 2007
Michael	Hohnholz		May 20, 2007
Molly	Irwin		April 30, 2007
Jeff	Jackson		April 27, 2007
Barbara	Jaksa		April 27, 2007
Ryan	Jennings		April 30, 2007

List of Commentors (*continued*)

Name		Affiliation	Date Submitted
Jim	Jones		April 28, 2007
Kay	Kayser-Meyrine		April 30, 2007
Michael	Kennedy		April 27, 2007
Todd	Kennedy		April 26, 2007
Sherab	Kloppenburg		May 9, 2007
Alex	Klumb		April 27, 2007
Bonnie	Koblitz		April 11, 2007
Tom & Peggy	Lange		April 10, 2007
Cary	Lewis		April 27, 2007
Jody	Lindvall		May 2, 2007
Mary Ann	Macliaclis		May 1, 2007
Brent	Maiolo		April 11, 2007
Cara	Maiolo		May 1, 2007
Jean	Miller		May 2, 2007
Rob	Morey		April 29, 2007
Ben	Morgan		April 26, 2007
Steve	Novy		April 27, 2007
Alison	Osius		April 27, 2007
Harold	Paeglow	Coyote Creek Outfitters	April 12, 2007
Carol	Petersen	Troublesome Valley Ranch LLLP	May 2, 2007
Stephen	Rudy		April 6, 2007
Robert	Russell		April 26, 2007
Matt	Samet		May 3, 2007
BJ	Sbarra		May 1, 2007
Scott	Schlosser		May 2, 2007
Howard W. & Myrna E.	Schmidt		April 28, 2007
Wayne	Shoemaker	Bar A Ranch	May 2, 2007
Suprena	Simpson		April 7, 2007
Suprena	Simpson		April 17, 2007
Eric	Smith		April 12, 2007
Steve	Smith		April 30, 2007
Richard	Spotts		April 5, 2007
Individuals *(continued)*			
George	Straw		April 10, 2007
Robert	Stumpus		May 1, 2007
Bill	Thompson		April 11, 2007
George	Trantow		April 26, 2007
Chris	VanValkenburg		April 30, 2007
Dennis	Veron		April 25, 2007
Joseph	Villacci		April 27, 2007
Richard	Wahl		April 25, 2007
Linda	Wilson		May 2, 2007
James	Wolf		April 23, 2007
David	Wynn		April 11, 2007
Len	Zanni		April 27, 2007

List of Commentors (*continued*)

Name		Affiliation	Date Submitted
Law Firms			
Kathleen	Corr	Bjork Lindley Little PC	April 30, 2007
Shirley	Fujimoto	McDermott Will & Emery for Union Telephone Company	May 1, 2007
James	Sanderson	Ryley Carlock & Applewhite for Galloway, Inc.	May 2, 2007
Organizations			
Dawnie	Baldo	National Scenic Byway	May 2, 2007
Nada	Culver	The Wilderness Society with Colorado Environmental Coalition, American Rivers, Inc., and Wilderness Workshop	May 2, 2007
Nada	Culver	The Wilderness Society with Colorado Environmental Coalition, Center for Native Ecosystems, American Rivers, Inc., Colorado Mountain Club, and Wilderness Workshop	May 2, 2007
Davis	Farrar	Red Hills Council	April 28, 2007
David C.	Hendrix	North Park Visitors Bureau	April 12, 2007
Kurt	Kunkle	Colorado Environmental Coalition with The Wilderness Society, Center for Native Ecosystems, American Rivers, Inc., Colorado Mountain Club, and Wilderness Workshop	May 2, 2007
Roz	McClellan	Rocky Mountain Recreation Initiative	May 2, 2007
Jennifer	McCurdy	Colorado Whitewater	May 2, 2007
Bob	Millette	Roaring Fork Sierra Club Group	May 3, 2007
Erin	Robertson	Center for Native Ecosystems with Biodiversity Conservation Alliance and Wilderness Workshop	May 2, 2007
Renee	Rondeau	Colorado Natural Heritage Program	May 2, 2007
Organizations *(continued)*			
John	Rosapepe	Colorado Trout Unlimited	May 2, 2007
Drew	Vankat	International Mountain Bicycling Association	May 2, 2007
Special Districts			
Debbie	Braucht	Robertson & Marchetti, PC for Horse Mountain Ranch Metropolitan District	May 1, 2007
Taylor	Hawes	Colorado River Water Conservation District	May 2, 2007

List of Commentors (*continued*)

Name		Affiliation	Date Submitted
State Agencies			
Ron	Velarde	Colorado Division of Wildlife, Northwest Region	May 8, 2007
Ron	Velarde	Colorado Division of Wildlife, Northwest Region	May 15, 2007

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APPENDIX F
WRITTEN SCOPING SUBMISSIONS

The BLM received 105 written submissions for the GS/KFO RMP/EIS through public scoping. These comments are reproduced in their entirety in this appendix. The formal scoping process began on March 2, 2007, with the publication of the NOI in the *Federal Register* (Appendix A, Notice of Intent). The scoping period continued for 60 days until May 2, 2007. However, comments received through June 16, 2007, were evaluated and are included in this report. The 105 public written submissions follow in the same order as the list of commentors in Appendix D, List of Commentors.

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Businesses

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form *by May 2, 2007.* Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name JAMES E. McDANIEL Date 5-1-07

Mailing Address P.O. Box 476 City/State/Zip WALDEN Colo 80480

Telephone (optional) 970-723-4781 E-Mail Address (optional) GOODCHARLESGHO@AOL.COM

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☑ No ☐

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

☐ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

Name of organization, government, group, or agency (if applicable) DBA: GOOD CHARLIE GUIDED HUNTS LLC # 1779

The BLM wants to hear from you!

The Kremmling and Glenwood Springs Field Offices are committed to listening to and learning from our neighbors, friends, and stakeholders, each of whom belong to a *community of interest* defined by a common concern for the future of our public lands. Your answers to the following questions will be helpful at this point in the planning process, as are any other comments. Thank you for taking the time to provide your input.

1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

SEE ATTACHED SHEET

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

No changes,

(Continue your comments on the other side.)

Public comments submitted, including names and street addresses of respondents, will be available for public review at the Glenwood Springs and Kremmling Field Offices during regular business hours (8:00 AM to 4:30 PM), Monday through Friday, except holidays. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be made available for public inspection in their entirety.

3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

Less people will use these public lands if roads are closed off, therefore businesses will suffer lose and communities also.

4) Any other issues, comments, or suggestions?

Another issue I have is the selling off or trading of BLM land to the private sector. BLM land is public land and should remain that way.

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

Place First Class Stamp Here

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

(1) One issue/ concern I have is the closing of roads if they aren't classified designated. I feel this is limiting and/or discriminating against the population which may be older in age, physically challenged in some way, those that don't have a horse or other means to enjoy BLM lands except by motor transportation. This is already the case on U.S.F.S. lands where roads are closed. I have permitted BLM land in the following areas;
Buffalo Peak Area (T6N, R80W), Green Ridge Area (T6N, R79W), White Slides Area (T6N, R82W), Pole Mountain Area (T6N, R81W).
A lot of the customers I have are older people that are physically challenged, they can't walk long distances, we have tried it. Closing off and limiting the roads I can take them on would hurt my business alot. Also I need to be able to retrieve game that has been harvested by my customers and most (not all) can be gotten on these lands by pickup truck without harming the land.

Jan. 15, 2007

RECEIVED
JAN 18 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

BLM
Kremmling Field Office
Box 68
Kremmling, CO 8045
attn. John Mankouski

John,

I hope I am not too late with this, we talked at the networking lunch last fall about the BLM planning process for the Behler Creek, Strawberry region east of Tabernash. I own a private in parcel located on the Strawberry Creek Trail, home of the High Lonesome Hut. As you know, the region of the Forest around my cabin site is master planned (Sulphur District Forest Master Plan) as a dispersed, non motorized recreation area with the exception of allowing snowmobiles in the winter.

The problem I have had in the ten years I have owned the property and operated the hut are motorcycles dropping in to the non motorized forest on the user constructed Phases trail. The dirt bikes are accessing the forest, and some are working north and east to trespass in the Indian Peaks Wilderness area near Monarch Lake.

A particular habit of dirt bikers might make it easy to stop the traffic. These users rarely, if ever, stop to move or cut down timber over their trail. The Phases trail now winds all over, going around a number of blow downs. If we were to spend a day on the west end of the trail, where it leaves Beeler Creek Road, cutting and dragging downed timber, I think we could destroy enough of the trail to stop the traffic.

The east side of this trial, on Forest Service, has been rutted to the point where it is nearly impossible to even walk or bike it. Similar rutting is taking place in the trails on the south end of BLM, where trails drop in to the Dwight and Jean Miller property along Meadow and Ranch Creeks. These trails need to be destroyed as well.

Please let me know if I can provide any more information or input on your planning process. Thank you for reviewing this information.

Sincerely,

Andrew Miller
Manager, Lonesome Hut LLC
Box 145
Fraser, CO 80442

RECEIVED
MAY - 1 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Williams

EXPLORATION & PRODUCTION
Tower 3, Suite 1000
1515 Arapahoe Street
Denver, CO 80202
303/572-3900
303/629-8282 fax

May 2, 2007

Via: Federal Express – Overnight Delivery

Bureau of Land Management
Kremmling Field Office
Joe Stout, RMP Manager
P.O. Box 68
Kremmling, CO 80459

Re: Williams Production RMT Company. Comments to the Notice of Intent to Prepare a Resource Management Plans for the Kremmling and Glenwood Springs Field Office and Associated Environmental Impact Statement

Dear Mr. Stout:

Williams Production RMT Company. ("Williams") appreciates the opportunity to comment on the Resource Management Plan ("RMP") and Environmental Impact Statement ("EIS") that your office is developing for the Glenwood Springs and Kremmling field offices. On March 2, 2007 a notice of intent was published which initiated public scoping under the National Environmental Policy Act ("NEPA") for an EIS that will cover both field offices and allow the offices to revise their respective RMP's.

Williams is currently producing gas from 1829 wells in the Piceance Basin. These resources produce a substantial amount of natural gas which in turn helps to alleviate the pressure of increasing demand for natural gas in the United States, while providing revenue to the federal, state and local governments through royalties and taxes on production. Williams recognizes the public interest in and the importance of the environmental resources in the Glenwood Springs and Kremmling field office management area. As you know Williams uses conventional drilling practices but has recently implemented some of the latest technology, drilling and extraction practices to reduce the impacts of development to the greatest extent possible.

Williams is committed to responsible natural gas development that protects environmental resources, minimizes surface use impacts and contributes to the local economic and social priorities of nearby communities. Williams has demonstrated its commitment to Colorado and the environment by partnering with the Colorado Division

of Wildlife to improve wildlife habitat; Colorado State University to study ways in which reclamation efforts can be improved; and the Department of the Interior and others to explore new processes for creating unobtrusive facilities. Williams is also committed to local communities and has contributed funds to Wildlife for the Future and the Mesa Land Trust to secure conservation easements for the protection of elk and deer migration corridors, winter range, and transition areas in Garfield and Mesa Counties. In addition Williams has donated over $1 million to the Colorado Mountain College to fund construction of a technology wing for the college's West Garfield Campus; donated $25,000 to the Meeker Pioneer Medical Center; and contributed funds to various organizations in the Rio Blanco County. In 2006 Williams contributed significant revenues to local governments. In Colorado alone Williams spent over $200 million in federal royalties and in Garfield County Williams' paid over $40 million in Ad Val and Severance Tax Fees. Williams has every intention of continuing its long standing tradition of being a good steward of Colorado's environmental resources and to continue our work with local communities and various stakeholder groups.

Williams offers the following comments to assist the BLM in identifying the salient issues for both the Glenwood Springs and Kremmling offices EIS and respective RMP's.

I. Proposed Actions to Be Considered

When the previous EIS was completed it was assumed that for each well drilled, a well pad and associated roads and pipelines would be required, however, many recent advances in drilling technology had yet to take place. Today many Williams and other operators have implemented techniques such as directional drilling, when feasible, which permits Williams to drill multiple wells from a single pad. Though the well pad is larger than would be required for a single well, overall surface disturbance is greatly reduced.

Williams acknowledges that increased development will likely cause an increase in some impacts. However, the impacts of development will not be permanent and can be substantially mitigated by advances in drilling technology. This, among other things can help to minimize the impacts on air and water quality in the region. For example Williams has designed, with the help of BRECO, a heavy-duty flowback unit to reduce the flaring of newly hydraulic fractured gas wells by up to 90%, cutting emissions and noise.

BLM should also make clear, when delineating the scope of the proposed action, that the RFD scenarios provided by Williams and other industry stakeholders do not impose absolute caps on development. *See Wyoming Outdoor Council*, 164 IBLA 84, 99 (2004) (holding with respect to the Pinedale RMP that the RFD Scenario does not establish a "point past which future exploration and development is prohibited"). Rather, "the RFD scenario serves as an analytical baseline for identifying and quantifying direct, indirect, and cumulative impacts, which provides the premise for formulating alternatives to a proposed action and strategies for mitigating adverse impacts." *Id.* (citing IM No. 2004-89 (Jan. 16, 2004)). The RFD is a tool for evaluating impacts, not an affirmative planning decision by BLM.

Williams also requests that BLM consider ten-acre downhole density in the proposed action. (Downhole density refers to the number of wells below the surface that can be directionally drilled.) Williams has had the opportunity to begin development in the tight geological formations of the Piceance Basin and has concluded that the economic recovery of gas requires ten-acre downhole density. Higher downhole density can be accommodated without a commensurate impact on the environment if advanced directional drilling techniques are employed when feasible. Williams can generally accomplish ten-acre downhole density using 80-acre surface density. Advanced technologies may in some cases, where deemed appropriate e.g., topography and geology, allow Williams to utilize 160-acre surface density to obtain the same result. Ultimately, the Colorado Oil and Gas Conservation Commission is responsible for determining the density required to prevent waste. Nevertheless, Williams requests that the proposed action include ten-acre downhole density and the associated impacts of such density be considered in the EIS.

II. Purpose and Need of Proposed Action:

In articulating the purpose and need for this plan the BLM should take into account the "public policy of the United States to make public lands...available for mineral leasing in an effort to reduce our energy dependence of foreign sources and to protect our national security." *Park County Resource Council, Inc. v. United States Dept. of Agriculture*, 817 F.2d 609, 620 (10th Cir. 1987) (citing Federal Land Policy and Management Act ("FLPMA"), 43 U.S.C. §§ 1701-1784 1982; Mineral Leasing Act, 30 U.S.C. § 181 *et seq.*). FLPMA requires that "the public lands be managed in a manner which recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber . . . ." 43 U.S.C. § 1701(12). In passing the Energy Policy Act of 2005, Congress emphasized that "the widening gap between supply and demand, accompanied by reliance on foreign sources to close that gap, has created profound concerns in the Congress over the Nation's energy security." S. REP. NO. 109-78, at 6 (2005) (Background and Need). The energy policy embodied in the Act is "necessary to ensure the country's continued growth and prosperity and to protect our national security." *Id.* To the extent possible, the development of different mineral resources should be accommodated. *See, e.g.*, BLM, IM No. 2003-253 (August 21, 2003) (setting forth BLM policy goals for development of different mineral resources to optimize recovery of *all* resources, prevent avoidable waste, honor the rights of lessees, protect public health and safety, and mitigate environmental impacts). Lands within the Glenwood Springs and Kremmling Management Area suitable for leasing should be open to leasing and development.

III. Mitigation Measures:

Williams encourages BLM to include reasonable mitigation measures to ensure the minimization of impacts from oil and gas development. Currently mandatory stipulations that are attached to leases can be waived on a site-specific basis. Williams suggests that the BLM continue to allow for waivers or exceptions to stipulations, so that the restrictions placed on development are not so prohibitive

as to make development infeasible or impractical. In determining the extent and the geographical scope of each stipulation, BLM should weigh the benefit of the proposed measure against the burden it will place on development. BLM should limit the imposition of overly burdensome measures, with little or no benefit to the environment, and employ such stipulations only in those instances when they are reasonably necessary for the protection of wildlife.

Williams continues to believe that application of stipulations on a site-specific basis, rather than as a mandatory condition on all leases, is just as protective of public lands and provides maximum flexibility to accommodate oil and gas development. In some situations, it is more beneficial for drilling to proceed expeditiously, and continue until complete, minimizing the time of on-going disturbance once drilling has begun. *See* Wildlife Management Guidelines for Oil and Gas Development, Colorado Mule Deer Association and Colorado Wildlife Federation (Aug. 1, 2006). Further, seasonal drilling can cause more impacts to the environment than year-round drilling; from repeatedly establishing the drill site, removing equipment at the end of the drilling season, and re-establishing the drill site lead to extra traffic, extra noise, and extra impacts. The time lost in setting up and breaking down also adds to the total time in the field and potential impacts to wildlife and other resources. In addition, repeated mobilization and de-mobilization activities also increase occupational safety risks.

Employing the latest techniques, Williams has been able to speed its drilling and complete development much more quickly than in the past, using quieter, more environmentally friendly rigs and compressors and minimizing impacts to wildlife. Cutting-edge advances in drill rig technology have already been discussed.

Second, as in all gas development, water is produced with the mineral. Unlike some other fields, Williams has determined that re-injection of produced water will not always be feasible in the Piceance Basin due to a lack of useable re-injection zones. Williams anticipates that some produced water will be recycled in the production process. The rest may require evaporation in containment ponds. Therefore, in developing mitigation measures, BLM should not mandate re-injection of produced water, but should consider alternative measures compatible with the geology of the area.

Williams encourages BLM to include a variety of potential mitigation measures as conditions of approval that may be employed on a site-specific basis to minimize impacts. Not every lease will require every mitigation measure, depending on the location, size, and resource values present on the surface. Thus, BLM should be given the flexibility to impose certain mitigation measures, as necessary, as it reviews the site-specific conditions during environmental review at the Application for Permit to Drill stage. Condition of Approvals and Best Management Practices should also be reviewed on a case by case basis and not based on the general lease area.

Finally, Williams suggests that BLM consider the impacts of potential development in this EIS to a sufficient degree that it facilitates the environmental analysis for future Applications for Permits to Drill and other site-specific actions tiered to the EIS. Indeed, BLM is required to complete the processing of an Application for Permit to Drill within 30 days of its receipt. Onshore Oil and Gas Order No. 1, 48 Fed. Reg. 58,226, 58,227 (Dec. 20, 1983). Further, the Energy Policy Act of 2005 created categorical exclusions for oil and gas activities. Pub. L. No. 109-58, § 390, 119 Stat. 594, 747-48 (2005). If BLM's EIS is sufficiently detailed and comprehensive, BLM may not be required to prepare EISs and EAs for some potential future development and may limit its analysis in other instances in reliance on the detail provided in the EIS. By taking care to include sufficient analysis in the EIS, BLM can ensure adequate protection of the environment, while facilitating future oil and gas development and minimizing costs and expenses for the operators and BLM.

IV. Conclusion

Thank you for the opportunity to comment on the scope of the proposed EIS and respective RMP's. Williams is committed to the responsible development of natural gas resources on public lands and fully supports BLM's efforts to address the changing needs of the Glenwood Springs and Kremmling office management areas. Williams will look forward to participating in the subsequent review processes as these plans emerge.

Sincerely,

Michael S. Paules
Environmental Manager

SUMMO USA CORPORATION
3900 S. WADSWORTH BLVD., SUITE 495
LAKEWOOD, COLORADO 80235
TELEPHONE: 720/228-0061 FAX: 303/863-1736

RECEIVED
MAY - 7 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

01 May, 2007

Mr. Joe Stout, RMP Project Manager
Bureau of Land Management
Kremmling Field Office
P.O. Box 68
Kremmling, CO 80459

Dear Joe,

I am writing in response to the recent BLM request for public input regarding the revision of the Resource Management Plans for the Glenwood Springs and Kremmling Field Offices. I am the Project Manager for the Copper Spur exploration project as recently staked by Summo USA Corporation. Our Copper Spur project covers 16 unpatented mining claims on BLM ground in Routt County, Secs. 27 and 34, T1S, R83W, 6th PM.

Copper Spur was mined intermittently from the early 1900's through the 1950's via a single underground drift approximately 500 feet long and was drilled as recently as 2005. Several of the 2005 drill holes cut high-grade copper intercepts which, if continuous, would justify development of a small underground copper mine on site. Thus, it is our intention to drill several follow-up holes to the east of the 2005 drill holes and the old underground workings to test for continuation of the known copper mineralization.

While exploration and mining activity has diminished in Colorado in recent years, please be aware that there is still prospective ground in this state, and exploration and mining should continue to be considered one of the legitimate multiple uses of public land.

Please contact me if you have any questions.

Sincerely,

Jason B. Price

Jason B. Price
jprice@constellationcopper.com

IPAMS
Independent Petroleum Association of Mountain States

410 Seventeenth Street ◆ Suite 1920 ◆ Denver, Colorado 80202 ◆ 303/623-0987 ◆ FAX: 303/893-0709 ◆ www.ipams.org

May 2, 2007

VIA EMAIL TO cormpkg@blm.gov

Bureau of Land Management
Kremmling Field Office
Joe Stout, RMP Manager
P.O. Box 68
Kremmling, CO 80459

Re: Comments to the Notice of Intent to Prepare a Resource Management Plans for the Kremmling and Glenwood Springs Field Office and Associated Environmental Impact Statement

Dear Mr. Stout:

These comments are submitted on behalf of the Independent Petroleum Association of Mountain States and its over 400 member companies regarding the Bureau of Land Management's (BLM) Notice of Intent to Prepare Resource Management Plans (RMP) for the Kremmling and Glenwood Springs Field Offices and Associated Environmental Impact Statement (EIS). IPAMS represents independent oil and gas producers and associated service and supply companies, financial institutions, and consultants. Independent producers drill 85 percent of the wells in the United States, produce 65 percent of the country's natural gas, and 40 percent of the oil. IPAMS appreciates the opportunity to comment, and respectfully requests that the BLM consider the following comments.

General Comments

IPAMS urges the BLM to recognize that oil and gas resources are vital to our Nation's energy security, and public lands in the Intermountain West contain significant domestic energy resources that the public owns and demands. The Intermountain West currently supplies over 25% of the nation's natural gas, more than any other region in the country. Natural gas is an essential, clean-burning energy source for American factories, farms, schools, and public transportation, and is used to create electricity. The Intermountain West is the nation's best future supply source for natural gas. It is estimated that this region has 284 trillion cubic feet (Tcf) of technically recoverable natural gas – that's enough gas to provide all of America's current household energy needs for 60 years. The Intermountain West contains one-third of all U.S. gas reserves for the lower 48

states. Based on forecasts by the Department of Energy, this region is poised to expand from 27% of lower 48 onshore production in 2003 to nearly 40% by 2025. Any attempts to limit access to this resource in any given area, such as in Kremmling or Glenwood Springs, requires our nation to rely more heavily on foreign sources of energy. The majority of lands in the Intermountain Region are managed by federal land management agencies, and new development will only occur if the BLM and other federal agencies recognize the importance of allowing reasonable access to natural gas reserves to provide energy to an estimated 62 million American households.

President's Executive Order 13212

The BLM must follow the President's Executive Order 13212 (2001) in completion of the RMPs and EIS. In the Executive Order, the President directs federal agencies to evaluate current programs, policies and rules, and to reduce barriers to America's energy self-sufficiency. The RMP/EIS should reflect federal law and policy and the nation's need for secure sources of domestic energy. The RMP/EIS should acknowledge that industry can develop the resources in an environmentally friendly manner while providing the nation with an abundant source of clean affordable energy. Furthermore, the BLM has a Congressionally mandated multiple-use mission, which must be honored and not compromised by the single-use land management objectives promoted by certain interest groups.

Legal Framework

It is the "*continuing policy of the Federal Government in the national interest to foster and encourage private enterprise in…the orderly and economic development of domestic mineral resources.*" 30 U.S.C. §21a. When the Federal Land Policy and Management Act ("FLPMA") was enacted in 1976, Congress declared that "*the public lands be managed in a manner which recognizes the Nation's need for domestic sources of minerals.*" 43 U.S.C. §1701(a)(12).

FLPMA dedicated the public lands to multiple use and sustained yield, and identified mineral exploration and development as one of the principle uses. 43 U.S.C. §1702(c),(l). Multiple-use, therefore, assumes the ongoing and obvious presence of mankind and his many extractive uses.

Congress also directed the President to encourage federal agencies to "*facilitate availability and development of domestic resources to meet critical material needs.*" 30 U.S.C. § 1602(7). The 2000 amendments to the Energy Policy and Conservation Act ("EPCA") required the Interior Department to produce a scientific inventory of oil and gas resources underlying federal lands, and to identify the extent and nature of any restrictions or impediments to the development of such resources. Section 604, Pub. L. 106-469, 42 U.S.C. § 6217 (2000).

The RMP/EIS must substantively and procedurally comply with the foregoing direction and policies that require BLM to promote and facilitate the development of energy resources on public lands. Robert Glenn, 124 IBLA 104, 108 (1992); Ellis Ferguson, 69 IBLA 352 n.2 (1983) (terms and direction in manuals and instruction memoranda are binding on BLM employees).

Wildlife

IPAMS and its members are committed to responsible natural gas development that protects environmental resources, minimizes surface use impacts and contributes to the local and state economy. Our members work cooperatively with the BLM, the Colorado Division of Wildlife, wildlife conservation groups, and other organizations to improve wildlife habitat and reduce the impact of development on the environment. IPAMS members are committed to being good stewards of the land. Besides the fact that daily operations follow strict government guidelines to ensure environmentally-responsible development, oil and gas companies have a rich legacy of improving wildlife habitat in the areas where they are developing sources of energy. These companies take their stewardship responsibilities seriously and over the years have voluntarily taken on many projects to improve habitat throughout the Rockies. IPAMS has started a program call *Conservation in Action* to partner companies with conservation groups in order to implement projects that improve wildlife habitat and further our understanding of the sustainable coexistence of wildlife and energy development.

Environmental Impact

IPAMS member companies strive to ensure that the impact of natural gas development is as small as possible. Each year, improvements in technology reduce the footprint of development, and reclamation techniques continue to improve so that the impact to the land is small and temporary. The BLM should consider that the impacts of development are indeed temporary when developing vital energy resources, and should balance that fact with the erroneous public perception that once the land is developed, it is 'lost' forever. Once wells are plugged and abandoned and final reclamation occurs, the disturbance to the land is barely discernable if at all. The BLM should remind the public throughout the process of developing the RMP and EIS that natural gas development does not preclude other multiple uses. Once a well is drilled, which usually takes just a few weeks, interim reclamation occurs and the land is available for hunting, hiking, and other recreational purposes.

While advances in technology continue to reduce the surface disturbance per well each year, BLM must not make assumptions that industry can directionally drill in every situation. Geological factors may prevent the use of directional drilling, and the additional cost coupled with mechanical challenges may make directional drilling infeasible in certain circumstances.

Socio-Economic Factors

As part of the planning process, BLM should ensure that all the economic benefits of natural gas development are included in the socio-economic analysis. Natural gas and oil development is part of a diversified economy in Colorado and the Western Slope. The industry contributes significantly to the local, state, and national economy, providing millions of dollars each year in royalties, bonuses, and severance taxes, besides other benefits of direct capital investment to local economies and high paying jobs. Oil and gas development is compatible with the tourism industry, and will not cause irreparable damage to hunting, fishing, and other recreational

activities, as is often argued by groups seeking to curtail the industry. We ask that the BLM keep in mind the true value of oil and gas production in Colorado, approximately $9.3 billion in 2005 according to the *Colorado Mineral and Mineral Fuel Activity 2005 – IS73* report published by the Colorado Geological Survey. Recreation is often presented in the public sphere as much more important to Colorado than oil and gas. IPAMS asks the BLM to provide balance when performing the socio-economic analysis, and to analyze the impact of measures that restrict development of energy resources.

Conclusion

Environmentally-responsible development of natural gas and oil resources in the Kremmling and Glenwood Springs planning areas will provide significant benefits to local communities, the state, and the nation. To successfully develop the resources in the area, all parties must work together to establish reasonable multiple use alternatives that will provide environmentally sound development of natural resources and minimize impacts on wildlife, plants, and recreational interests. We appreciate this opportunity to provide BLM with our comments. Please do not hesitate to contact IPAMS should you have questions about our comments or recommendations.

Sincerely,

Kathleen Sgamma
Manager of Government Affairs

Counties

From: BLM Form Mailer
Date: Friday, April 27, 2007 12:52:40 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Debra**
lastName	**Campbell**
address	**PO Box 239**
city	**Hot Sulphur Springs**
state	**CO**
zipCode	**80451**
phone	**9707253347**
email	**Dcampbell@co.grand.co.us**
Mailing_List	**yes**
Affiliation	**Regulatory_Agency**
Other_Affiliation	**Grand County Department of Planning and Zoning**
Question_1	**Comply with the Grand County Master Plan to ensure that future proposals/ projects: - promote maintenance of open space and wildlife habitat: - Improving the quality of new development and minimizing its impact: - Targeting new development to suitable land within or adjacent to Town Boundaries: - Ensuring that new development is served by adequate infrastructure Development and encourage recreational use. Develop and interpret appropriate historic uses.**

Question_2	**1. Utilize sustainable principles for trail design and materials for trail construction. 2. Utilize universal design criteria whenever possible to facilitate access for the aging population.**
Question_3	**Question 3 1. Improved access to public lands for all user groups. 2. Develop and maintain support facilities for access (parking, restrooms, fishing support, etc.). 3. Encourage recreational policies for land use in appropriate areas. Develop as part of the plan implementation to notify public of any changes to road access, parking, allowed uses, etc 4. Develop interpretation of historic and natural features as appropriate.**
Question_4	**None**
Submit	**Submit Comments**
MM_insert	**form1**

Department of Road & Bridge

Ken Haynes • Road Superintendent

Division of Natural Resources
Jennifer Murray, Division Foreman
467 E. Topaz, PO Box 9, Granby, CO 80446
Office: 970-887-0745 • Fax: 970-887-3168

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MAY - 7 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

May 3, 2007

Mr. Joe Stout
Bureau of Land Management, Kremmling Field Office
PO Box 68
Kremmling, CO 80459

Dear Mr. Stout;

Thank you for the opportunity to comment on the Kremmling Field Office Resource Management Plan. Grand County is in support of updating the Resource Management Plan which guides the decision making across BLM administered lands.

- Based on the usage numbers collected by the BLM, Grand County is in concurrence with the proposed designations of SRMA and EMRA with the possibility of Wolford Recreation Area becoming an SRMA as well, if the numbers support it.
- The Trails and Travel Management plan should create and designate additional specific routes for the enjoyment of the different user groups, and increase the quality of signage to ease use. Routes that have not been officially designated as trails should be closed and re-vegetated with appropriate cover. This will protect wildlife, critical habitat, native plant species, and important riparian areas. Keeping and maintaining designated routes will also ensure a primitive experience for other user groups. The continued increase in OHV use in the KFO area warrants diligence by the KFO to be vigilant in the arena of noxious weed management.
- Fluid Minerals Management should focus on minimizing impacts to the watershed as a whole as well as immediate ground and surface water, wildlife, critical habitat and to other various user groups. Additional action should be taken to control invasive weed species which generally increase under this type of development.
- Livestock grazing should continue to be managed in accordance with the Standards for Public Land Health and Guidelines for Livestock Grazing Management in Colorado. Periodic assessments should occur to determine proper AUM's; to include domestic grazing livestock as well as wildlife species. Middle Park is critical wintering habitat for several big game species and it is important to Grand County to maintain and improve this range when and where possible.

Additional support should be provided to address noxious weed control to improve vegetation type and cover for grazing domestic animals as well as dependant wildlife species.

- Due to the mountain pine beetle epidemic and the massive amounts of associated tree mortality, Grand County is in support of wildland fire mitigation projects especially on BLM lands that are within or close to the wildland urban interface (WUI) as delineated in the Grand County Community Wildfire Protection Plan. Grand County would encourage the BLM to include, where appropriate, projects that include some prescribed fire. Grand County would also encourage the BLM to consider different options for the disposal of slash generated from timber/salvage sales. Options other than pile burning, especially within the WUI. The number of slash piles being generated by private land owners conducting mitigation work is roughly 6,000+ piles per year. BLM slash burning comes into direct competition with private land owners each available burn day. If the BLM must conduct slash burning within the WUI, please consider following the Grand County Open Burning Management Plan and keep slash piles to as close to 15'x15'x 15' as possible. Proper re-vegetation and noxious weed control should also be made a requirement for past and future projects.

Sincerely,

Jennifer Murray
Foreman

Elected Officials

From: Joe_Stout@blm.gov
Date: Wednesday, May 09, 2007 9:52:04 AM
Posted At: Scoping Comments 2007
Conversation: RMP
Subject: Fw: RMP

----- Forwarded by Joe Stout/KRFO/CO/BLM/DOI on 05/09/2007 09:51 AM -----

"Thomas Clark"
<mayor@townofkremmling.org>
05/03/2007 02:35 PM
Please respond to "Thomas Clark" <mayor@townofkremmling.org>

To
<Joe_Stout@blm.gov>
cc
Subject
RMP

I did not see Big Muddy Creek (NW of cliffs) and Wolford Mountain Camp facilities mentioned.
Thomas Clark, Mayor, Town of Kremmling
970-724-3249, FAX 970-724-9409
mayor@townofkremmling.org

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BUREAU OF LAND MGMT.
GLENWOOD SPRINGS, CO.
2007 MAY 3 PM 4 07

EAGLE COUNTY

May 1, 2007

Brian Hopkins
United States Department of the Interior
Bureau of Land Management
Glenwood Springs Field Office
50629 Highway 6 and 24
Glenwood Springs, Colorado 81601

RE: Potential locations for a Motocross Track in Eagle County.

Dear Brian:

It has repeatedly come to our attention that Eagle County is in need of a designated location for dirt bike and other off-road vehicle enthusiasts to ride in a controlled setting. Providing a designated location for a Motocross Track area will help to reduce the unchecked proliferation of uncharted trails on public and private lands alike. Also, the number of conflict incidences between different types of trail users would likewise decrease. This concept has been supported by both motorized and non-motorized user groups alike.

As part of the Bureau of Land Management process of updating its Resource Management Plan, the Eagle County Board of Commissioners requests that the BLM lands be evaluated for suitability for a Motocross Track facility.

Thank you for considering our request. Eagle County will assist with GIS Mapping capabilities and in any other manner practicable. Please contact Bob Narracci in the Community Development Department at (970) 328-8750 to further discuss the potential of locating such a facility on Bureau of Land Management land.

Sincerely, Eagle County Board of Commissioners

Arn M. Menconi, Chairman

Sara J. Fisher

Sara J. Fisher, Commissioner

Peter F. Runyon, Commissioner

BOARD OF COMMISSIONERS

JAMES L. NEWBERRY
District I, Winter Park 80482
NANCY STUART
District II, Granby 80446
GARY BUMGARNER
District III, Kremmling, 80459

E-Mail: grndcty1@co.grand.co.us
PHONE: 970/725-3347
Fax: 970/725-0565
LURLINE UNDERBRINK CURRAN
County Manager
ANTHONY J. DICOLA
County Attorney

May 2, 2007

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MAY - 4 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
P.O. Box 68
Kremmling, CO. 80459

Re: Wild & Scenic Designation

Dear Mr. Stout:

Grand County believes that a wild and scenic designation may be appropriate, but needs more information. We are pursuing a stream management plan for the Colorado River which we hope will result in an operational agreement to protect and enhance flows in the Colorado River. We would like to be able to further assess your process and its' impacts and how it may or may not coordinate with our own efforts.

Thank you for the ability to comment.

Sincerely,

Lurline Underbrink Curran

Lurline Underbrink Curran,
County Manager

LUC/lc
cc: Barbara Green
David Taussig
Peggy Bailey
Lane Wyatt
Colorado River Water Conservation District
Middle Park Water Conservancy District
Roy Smith/BLM

P.O. BOX 264 HOT SULPHUR SPRINGS CO 80451-0264

Federal Agencies

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name Doreen Sumerlin / USFS Date 4/10/07

Mailing Address PO Box 10 City/State/Zip Granby 80446

Telephone (optional) _____ E-Mail Address (optional) dsumerlin@fs.fed.us

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☒ No ☐

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

☐ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☒ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

Name of organization, government, group, or agency (if applicable) US Forest Service
Arapaho-Roosevelt NF Sulphur RD

The BLM wants to hear from you!

The Kremmling and Glenwood Springs Field Offices are committed to listening to and learning from our neighbors, friends, and stakeholders, each of whom belong to a *community of interest* defined by a common concern for the future of our public lands. Your answers to the following questions will be helpful at this point in the planning process, as are any other comments. Thank you for taking the time to provide your input.

1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

– over –

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

(Continue your comments on the other side.)

Public comments submitted, including names and street addresses of respondents, will be available for public review at the Glenwood Springs and Kremmling Field Offices during regular business hours (8:00 AM to 4:30 PM), Monday through Friday, except holidays. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be made available for public inspection in their entirety.

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3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

4) Any other issues, comments, or suggestions?

Thanks for the Granby open house + the chance to comment. I am submitting comments on behalf of several staff areas on the Sulphur Ranger District:

① Fire: Encourage expanded use of Category C - consistency from SRD to BLM adjacent lands. Explore opportunities for cooperative burns (e.g. Kinney area).

② Travel Mgmt: need to work together to solve user created TM dilemmas in Kinney and Tabernash areas (ATVs and mountain bikes).

③ Allotment Mgmt: 7752 - Skylark - erroneous boundary on Forest - we can send you the accurate allotment body, if you don't have it.

④ Land Acquisitions: Prior to disposals, please continue to send lists of parcels to FS that are within or adjacent to proclaimed boundaries so that we can pursue administrative transfers, where appropriate.

⑤ Concerned about the potential extent of oil + gas leasing proposed along Muddy Creek, especially in the Wolford vicinity! Elk + deer winter range and sage grouse habitat are rapidly being lost to development in Grand County. We need to start pulling together to safeguard remaining habitats.

⑥ Noxious weed management - continue to work cooperatively with all county-wide partners to prevent, control, eradicate invasive species in the County. Of particular concern are invasives moving up the Colorado River (clematis, tamarisk): tamarisk around Wolford Reservoir, and list A species KFO-wide.

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

Place First Class Stamp Here

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
http://www.epa.gov/region08

MAY 16 2007

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MAY 18 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Ref: 8EPR-N

Joe Stout, RMP Project Manager
Bureau of Land Management
Kremmling Field Office
P.O. Box 68
Kremmling, Colorado 80459

Re: Scoping comments on the Kremmling and Glenwood Springs Resource Management Plan Revisions and Draft Environmental Impact Statement

Dear Mr. Stout:

The Environmental Protection Agency (EPA) Region VIII Office offers the following scoping comments on the proposed revisions to Kremmling and Glenwood Springs Resource Management Plans and associated draft Environmental Impact Statement (DEIS).

BLM proposes to amend its set of land use plans for the two field offices including Kremmling and Glenwood Springs Field Offices. We appreciate BLM's efforts to balance multiple use objectives with protection, restoration, and enhancement of resources, therefore we have some recommendations to these proposed BLM land management plans to improve protection and restoration of ecosystems, watersheds, fisheries and wildlife habitat. We also believe that land management should incorporate monitoring and adaptive management principles to assure that effects on ecosystems are detected and ecosystems are protected while multiple use activities occur. EPA's principal areas of focus for these upcoming land use plans include the following:

1) Air quality modeling: Typically the air quality analyses presented in other RMP Draft EISs have only provided qualitative analysis based on data not specific to the area. Consequently, BLM indicates in RMP Draft EISs that quantitative air quality analysis will only be undertaken when specific industrial activities are proposed. While EPA understands that BLM pursues this approach because of uncertainties with anticipating possible future projects, analysis of air impacts from the proposed and reasonably foreseeable development is consistent with NEPA requirements and important to informed decision-making. This RMP revision will

consider substantial new oil and gas wells activities, especially in western Garfield County in the Glenwood Springs RMP and in northern Jackson County in the Kremmling RMP. The air quality impacts associated with reasonably foreseeable future actions (both direct and cumulative), including appropriate mitigation measures, should be analyzed and disclosed in this upcoming Draft EIS.

EPA suggests that the air quality analysis at this RMP stage should be specific using air dispersion modeling tools, particularly focused on the impacts to air quality related values (visibility, atmospheric deposition, and lake chemistry) and ozone. An air quality modeling protocol is currently being developed for the White River RMP by the BLM. Therefore we suggest that your offices work with the BLM White River field office on air quality modeling for this RMP. Also note that EPA will soon comment on the adjacent Little Snake RMP Draft EIS (comments due by May 30, 2007) in which we express our concerns about the lack of air quality dispersion modeling in that RMP and Draft EIS process.

2) Depicting environmental trends and adaptive management: We recommend information on monitoring and assessment and adaptive management programs be provided that effectively display conditions to the public and decision makers. For such information to be useful, it should be displayed in graphic and numerical data form, depicting historical trends compared to BLM's desired functions and conditions (DFC) and the applicable air and water quality standards.

3) Improved impaired streams: The Draft RMP and EIS should explain what improvements will be made in impaired watersheds (i.e., Clean Water Act Section 303(d) listed waters) and if water quality standards are currently met, how water quality will continue to be protected and maintained. We encourage the BLM to achieve the DFC for riparian areas, wetlands, and water resources as quickly as possible. The RMP EIS should describe the work need to improve all functioning-at-risk (FAR) and non-functioning (NF) streams and wetlands to attain proper functioning condition (PFC). We support stream restoration that is consistent with Colorado TMDL development schedules.

4) Travel Management: We suggest that the RMP identify road drainage and compliance with best management practices on the existing BLM-maintained road network, and identify roads which cannot be adequately maintained within agency budgets and capabilities. Travel management direction should better assure that road impacts to water quality, fisheries and wildlife will be mitigated. Roads should be inspected and evaluated to identify road drainage or best management practices deficiencies, and roads that cannot be adequately maintained should be considered for closing and decommissioning.

5) Prolonged drought, beetle kill, and adaptation to climate change: Several community participants in the Kremmling and Glenwood Springs areas expressed concerns about the deterioration of their local view shed by pine beetle kill in forested areas and the related increased risk of wildfire. There are significant beetle kill areas northwest of Walden and west of Granby on BLM-managed public lands. Citizens noted that culling dead trees in forested areas

on BLM lands would reduce the risk of wildlife, but it could also further diminish the scenic view sheds that these communities value. Acknowledging that BLM may not have the resources to respond to this problem, several communities suggested establishing public/private partnership to mitigate wildfire danger through extraction and use of dead timber. Some research has shown a potential connection between beetle infestations and temperature increases due to recent climate change. Due to the emerging issue of reducing greenhouse gas emissions related to climate change, BLM may also want to consider how various management alternatives would affect the rate that carbon will be sequestered in the soil. See our enclosed detailed comments for additional information which suggests how the BLM might analyze in this upcoming EIS rapid shifts in vegetation due to drought, beetle infestations, and climate change.

Detailed comments are enclosed for your review and consideration as you complete the Draft RMP and Environmental Impact Statement.

EPA appreciates the opportunity to review and comment on your scoping notice. If we may provide further explanation of our concerns please contact Mr. Weston Wilson of my staff in Denver at (303) 312-6562.

Sincerely,

Larry Svoboda
Director, NEPA Program

Enclosures

Detailed comments by the US Environmental Protection Agency regarding the Kremmling and Glenwood Springs Resource Management Plan Revisions and Draft Environmental Impact Statement

I. Drought, Beetle Infestation and Climate Change

As research by EPA's Office of Research and Development has shown, vegetation zones are likely to shift as climate changes over the next decades. Already changes have been observed in forest vegetation in northern Colorado due to drought and various tree beetle infestations. Researchers have linked increased temperatures to increased beetle populations. The beetles are able to kill more trees because winter temperatures are not sufficiently cold and long enough to curtail insect infestations. Beetle kill trees are also more susceptible to fire. As a result, most climate models indicate that drought conditions over the Western U.S., will increase wildfire occurrences.

EPA research also indicates that global climate change may lead to rapidly changing climate conditions beyond the capacity of many plant species to affectively adapt. Rapid loss of vegetation may occur rather than slow re-establishment of adapted plants. Of primary concern is that this climate-induced vegetative dieback could generate a pulse of CO_2 that would magnify any warming effect of anthropogenic emissions and also limit the effectiveness of carbon sequestration efforts through reforestation.

In addition to increased temperature and CO_2, ecosystems will be exposed to increased air pollution resulting from warmer climates. The primary cause of air pollution damage to vegetation is tropospheric O_3. In field experiments, elevated levels of O_3 tended to cancel the stimulatory effect of increased CO_2 on plant growth.

Currently, the U.S. is pursuing voluntary limits on CO_2 emissions, but should the U.S. decide to implement limits on carbon emissions in the future, federal agencies may be called upon to improve their land management to increase carbon sinks. Should federal agencies be called upon to improve carbon sinks, then the management of natural ecosystems to maximize carbon sequestration will require a detailed knowledge of past, present, and future land use, and how such practices affect carbon sources and sinks.

Restoring severely degraded rangeland can improve the total amount of carbon being sequestered in the soil, known as soil organic carbon (SOC). Soil erosion that results from degraded rangeland conditions can decrease SOC content by as much as 25%. Soil erosion can also expose calciferous horizons, or caliche, which can cause increased CO_2 emissions. Restoring degraded grazing lands can avoid such increases in CO_2 emissions and lead to improving the rate of carbon accretion in the soil. This might be accomplished by enhancing vegetative cover, improving soil structure though best management practices, and decreasing runoff. Such management improvements can be evaluated based on the rate of change in SOC. Controlling soil erosion and restoring eroded soil conditions on degraded grazing lands has been

observed to increase the amount of SOC sequestered by 100 to 200 kg/ha/yr. The issues that EPA suggests BLM consider in this RMP and EIS is which management plan(s) would work best to enhance and increase the rate of carbon being sequestered on the public lands within the RMP areas.

We suggest that the BLM approach this complex problem by analyzing the current trends in vegetation distribution within these two RMP areas and how such changes may be affected by prolonged drought and beetle infestations. This would establish a baseline condition if no other change in land use management of these grazing lands were to take place. This could then be compared to how such SOC storage may change due to alternative land use management. We encourage BLM range management staff to maintain a working level of the knowledge of vegetation modeling methods and assessment tools being developed to evaluate land management options in conjunction with climate change effects. Applicable references include:

1) *The Potential of U.S. Grazing Lands to Sequester Carbon and Mitigate the Greenhouse Effect*, edited by R.F. Follet, J.M. Kimble, R. Lal, 2001 by CRC Press, 442 pp.

2) A Summary of NHREERL Ecological Research on Global Climate Change, edited by Peter Beedlow and David Tingley, U.S. EPA, April 2007, EPA/600/R-05/007, http://www.epa.gov/wed/pages/publications/authored/EPA600R-007SummaryOfNHEERLEcoResearchOnGCCBeedlow.pdf

3) "Carbon Sequestration in Dryland Ecosystems", Rattan Lal, Carbon Management and Sequestration Center, Ohio State University, Environmental Management, December 2003, Vol. 33, No. 4, pp. 528-544, http://www.ncbi.nlm.nih.gov/entrez/query.fcgi?cmd=Retrieve&db=PubMed&list_uids=15453406&dopt=Abstract

4) "Spatial heterogeneity of aggregate stability and soil carbon in semi-arid rangeland", S.B Bird, J.E. Herrick, M.M. Wander, and S.F. Wright, Environmental Pollution, 2002, volume 116, No. 3, pp. 445-455. http://www.ncbi.nlm.nih.gov/entrez/query.fcgi?cmd=Retrieve&db=PubMed&list_uids=11822724&dopt=Abstract

II. Adequacy of existing management for oil and gas

The RMP revision should serve to resolve: 1) resource conflict, 2) management inconsistencies and 3) incorporate best management practices and best available technology in minerals development. The following are issues related to minerals development (fluids and non-fluids) that can be addressed in the RMP revision:

• Conditions of Approvals, Best Management Practices, and reclamation may be reviewed for previously leased areas in this planning effort.

• New or different leasing stipulations (no surface occupancy, controlled surface use, and timing limitations) and Conditions of Approval can be developed for un-leased areas to ensure consistency with revised resource management objectives.

• Coal bed methane development has not been addressed in previous plans. Resource development potential, drilling, operational requirements, spacing, and conflict with other uses should be addressed in detail. Requirements for production water disposal and possibly from each producing interval (if constituents are different) should be addressed.

• In areas rated as medium, low and no-known potential other resource values can take precedent over oil and gas exploration and development. Since these areas are not leased, new lease stipulations can be applied to future leasing.

III. Reasonably foreseeable future oil and gas development

New leases over the past year in Jackson County include additions to the northwest (Alkali Lake), west (Lone Pine-Delaney Butte-Butler Creek), and southwest (Coalmont- Pole Mountain- Grizzly Creek) areas. The August 2006 BLM leasing auction included 41,200 acres of requested new leases, including 25,000 acres of split estate (private surface/Federal mineral) lands, and 15,000 acres of BLM surface managed lands. Grand County has also seen new leasing interest, predominately in the far northwest corner, at the Whitely Peak- Carter Mountain area, and at the west Troublesome Wilderness Study Area (WSA). This new leasing interest includes approximately 12,350 acres, and is the first leasing interest in Middle Park this century. Almost all of the 12,350 acres were on split estate (private surface/Federal mineral) lands. Future coal bed methane development is possible, based on the continued testing of the existing and permitted wells, on the availability of an existing limited pipeline, and construction of new and increased pipeline capacity. If continued testing results are favorable, and permittable methods are developed for disposal of excess produced water, considerable coal bed methane could occur in over 250,000+ acres of subsurface coal occurrences in North Park in Jackson County.

IV. Water quality impacts in western Garfield County from oil and gas development

As you may be aware, Garfield County conducted a detailed study of public concerns regarding contaminated ground and surface waters from adjacent oil and gas development, some of which occurred on BLM-managed lands, including split estate lands primarily south of Rifle and Silt, Colorado. See: "Phase I Hydrogeolocic Characterization of the Mamm Creek Field Area in Garfield County", Prepared for Board of County Commissioners, Garfield County, Colorado, March 23, 2006, URS Corporation

Due to concerns about migration of methane into ground and surface waters, in July 2004, COGCC began requiring bradenhead monitoring of all oil and gas wells in the Mamm Creek field area. If a gas well has bradenhead pressures exceeding 150 psi, then the operator is required to notify the COGCC. From data provided to URS by COGCC, there were 148 gas wells with bradenhead pressures exceeding 150 psi at some point during 2004 and 2005. Most

wells drilled in the Mamm Creek Field require a reserve pit used to contain the drilling mud used to maintain safe borehole pressures, minimize formation damage during drilling, provide cooling for the drill bit, and help circulate drill cuttings to the surface. These pits are not separately permitted by the COGCC and are part of the BLM managed APD. At the end of well drilling and completion, reserve pits are dewatered and the remaining pit solids (mostly rock cuttings) buried. Reserve pits may be unlined or lined (usually poly liner) depending on depth to shallow ground water (required by COGCC rule) or by operator preference. The majority of reserve pits in Mamm Creek Field have been lined. In some cases, operators have also used the reserve pit as "completion" or "flow-back" pits used to flow-back fluids and gas from hydraulic fracturing (frac'ing) operations. Open pit flow-backs are usually done under a flare, where gas in the flow-back is burned. Residual petroleum hydrocarbons (condensate) that are sometimes intermittently produced during flow-back are also burned during flaring. Since 2002, most Mamm Creek Field operators have used a multi-phase separator during frac'ing flow-back where gas and occasional condensate have been separated from the flow-back fluids and the gas collected into sales lines and condensate into tanks. These flare-less completions are called green completions.

There are documents on file with the COGCC that document the release of condensate and water at the ground surface from old plugged and abandoned wells within the study area. Older gas wells may not have been originally plugged and abandoned to the same standards as are currently required. Cement plugs and steel casing may also fail over a period of decades. There are no routine monitoring program requirements for plugged and abandoned wells in Colorado. There are currently 29 abandoned (temporarily abandoned, dry and abandoned, and plugged and abandoned), and 33 shut-in wells within the study area. Shut-in gas wells are considered active wells by COGCC, and require routine mechanical integrity tests (MITs). Bonding is required for some shut-in gas wells that remain inactive for extended periods. Gas wells that experienced significant drilling and/or completion problems could potentially result in releases of hydrocarbons to the near surface environment. COGCC rules require that drilling and completion problems are reviewed by COGCC engineers, and approval must be obtained by operators prior to conducting remediation of well bore problems. Methane has been detected at elevated concentrations in a number of water well locations in the eastern portion of the study area. Based on work performed by COGCC, in the vicinity of the West Divide Creek gas seep and the G33 pad area groundwater and surface water have been impacted by thermogenic methane related to gas development activities. In the southeast portion of the study area, extensive water sampling has detected some of the highest concentrations of methane. There has been relatively little drilling in the vicinity of the Divide Creek area. However, some older gas wells are present within this area. It is likely that releases from inadequately plugged and abandoned wells, and wells where significant completion problems were encountered, are a source of methane to groundwater in this area.

Potential means to analyze and identify whether there are adverse ground and surface water impacts from gas exploration and development include:

• Analyses of the major and minor organic and inorganic constituents in natural gas compared to samples collected from potentially contaminated water and from a suspect gas well.

The observed geochemical differences in natural gas constituent concentrations can be used with a mixing model to associate organic content to discrete lithologic units.

• Water and gases may be sampled and analyzed for their carbon stable isotope composition as a type of fingerprint. Carbon and hydrogen isotopes in methane can be used to distinguish biogenic gas from thermogenic gas, as the thermogenic gas contains isotopically heavier carbon. In places within the gas-rich Piceance Basin there may be naturally occurring seepage or migration of methane and other light hydrocarbons upwards to shallow groundwater, or to the ground surface. The carbon and hydrogen isotopic composition of this naturally occurring background gas may differ from that of gas leaking from a nearby gas well, because the gas well produces from discrete pay zones, which may have a unique isotopic signature.

• Detection in samples of well water or surface water of dissolved organic compounds like methane, ethane, propane, toluene, or benzene, which were analyzed for but not detected in the water prior to the installation of a "nearby" gas well. The definition of "nearby" depends on factors like the degree of natural fracturing and hydrologic properties of the formation rocks, but probably rarely exceeds 1,500 meters (m).

• Another indicator would be the detection of components of drilling mud or hydraulic fracturing fluids in groundwater or surface water. If feasible, the same constituents should be analyzed at the gas well to confirm that they were used during installation of the well. A wide variety of chemical products may be used in drilling and completing a gas well, including: drilling fluids (oil-based muds, synthetic-based muds, barite or similar weighting agents), acidizers, fracturing fluids, surfactants, foamers, defoamers (antifoamers), asphaltene dispersants, corrosion inhibitors, biocides and equipment degreasers. Material Safety Data Sheets (MSDSs) sometimes identify the chemicals used in these products, while others do not identify formulations that are considered trade secrets.

Based on this experience in Garfield County, BLM and the COGCC could conduct additional baseline monitoring in key areas in order to identify and avoid similar impacts that have occurred in Garfield County. This RMP could include several means to identify beforehand the baseline conditions to help identify the sources of any contamination in the future. Such efforts might include:

a. General field investigations using vehicle-mounted gas detection instruments to identify potential gas seeps in the area, and other regions where ground water monitoring data is limited. Such a survey would be conducted in areas with few gas wells and areas with densely spaced gas wells.

b. Develop a long-term groundwater and surface water sample collection program. Collect baseline data in areas not already drilled (i.e. stay ahead of the drilling). If not already completed, develop a sampling and analysis plan that addresses collection, analysis, and quality assurance and quality control specifications for

groundwater and surface water sampling for major cations and anions, organics, metals, stable isotopes, and gases.

V. Managing and control noxious weeds

EPA supports the goal of preventing the introduction and spread of invasive plants and noxious weeds Noxious weeds are a great threat to biodiversity. Weeds can out-compete native plants and produce a monoculture that has little or no plant species diversity or benefit to wildlife. Noxious weeds tend to gain a foothold where there is disturbance in the ecosystem and this is likely to be exacerbated by rapid changes in climate due to global warming.

EPA supports integrated weed management including the effective mix of cultural, education and prevention, biological, mechanical, chemical management. BLM should prioritize its management techniques to select non-chemical treatments first, with reliance on chemicals herbicides where necessary.. Early recognition and control of new infestations is encouraged to stop the spread of the infestation and avoid wider future use of herbicides, which could correspondingly have more adverse impacts on biodiversity, water quality and fisheries. Weed control chemicals can be toxic and have the potential to be transported to surface or ground water following application. Herbicide drift into streams and wetlands must be avoided. Herbicides should be applied at the lowest effective rate. Aerial application of herbicides can provide the most effective means of addressing widespread weed infestations. Appropriate controls may include:

- adequate streamside buffers (approximately 300 feet for aerial applications and 50 feet for ground applications);
- mechanical weed removal adjacent to streams;
- flagging aquatic areas on the ground;
- use spray nozzles and drift reduction agents that produce larger herbicide droplets to reduce drift;
- use of photodegradable dyes in herbicides;
- use of GPS technology or ground radio contact with pilots;
- use of spray detection cards;
- release of herbicides at lower altitudes to reduce drift;
- people living within one-fourth mile of an area to be treated aerially are notified during project planning and shortly before treatment;
- herbicide mixing, loading, or cleaning areas in the field are not located within 200 feet of private land, open water or wells, or other sensitive areas; etc,.
- certified pesticide applicator supervises each BLM application crew and trains crew members in personal safety, proper handling and application of herbicides, and proper disposal of empty containers.

We often suggest use of a more selective herbicide (such as clopyralid) in aerial spraying, since a more selective herbicide would kill fewer non-target plants. Also, in the unlikely event of a spill, the spill is quickly contained and cleaned up, and appropriate agencies and persons should be promptly notified.

Noxious weeds can be spread by vehicles. The BLM may want to consider some restrictions on vehicles to reduce potential for reinfestation of the area by noxious weeds after treatment. Reseeding with native grass mix is typical practice but BLM may also need to consider reseeding with a lower elevation grass seed mix to compensate for climate change. The goal of the seeding program should be to establish the sustainability of the area including changes that might result from rapid changes in climate.

VI. Fire Management and Ecology

It is recognized that fire suppression over the last 100 years has changed the structure and composition of forest ecosystems, and that fire is a necessary disturbance phenomena to keep fuel density in check and to maintain healthy forest ecosystems.

The RMP should reflect national fire management strategies and policies such as the 1995 Federal Wildland Fire Management Policy and Program Review (USDA and USDI 1995), that directs integration of fire into land management planning, working with landowners and stakeholders, and directing landscape level analysis; and the National Fire Plan directing full range of fire management activities linked to RMPs.

We support reintroduction of fire as a natural disturbance process and to treat unwanted competing vegetation and fuel loads, fire risk and forest health. Land management should be based on understanding and consideration of all natural disturbance processes, certainly including fire, but not limited to fire. Other natural disturbance processes such as insects and disease, and ecosystem processes (such as the flows and cycles of nutrients and water) and their dynamics also need to be considered in managing fuels. The intensity, frequency and magnitude of disturbance regimes for all these natural disturbance processes (e.g., fire, insects, disease) need to be considered.

We also believe the RMP offers opportunities to address the heavy reliance on fire suppression by promoting increased public understanding of the necessary role of fire in forest ecosystems, and attempting to restore more natural fire disturbance regimes to forest ecosystems. We encourage improved public education programs to increase public understanding of the need for and value of fire in forest ecosystems. The risks of uncharacteristic disturbances such as catastrophic wildfire need to be evaluated versus the effects of fuels management actions designed to reduce those risks (i.e., water quality, fisheries and wildlife effects). Methods to address competing and unwanted vegetation and fuel loads and fire risk need to be evaluated vs. water quality, fisheries and wildlife effects from fuel and vegetation treatments. Thresholds for acceptable environmental impacts for fuel treatments around WUI's and areas of severe fire risk may be higher.

Individuals

From: BLM Form Mailer
Date: Monday, April 16, 2007 10:02:58 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Johann**
lastName	**Aberger**
address	**444 Euclid Ave.**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	
email	
Mailing_List	**no**
Other_Affiliation	**Colorado Mountain College, Outdoor Education Department**
Question_1	**Keeping Thompson Creek open to climbers.**
Question_2	**No modifications or changes**
Question_3	**Recreational opportunities for outdoor entheusiasts. Educational opportunities for climbers.**
Question_4	**The impact of climbers on this rock has been made. At this point, modifications will only further destabilize the formation. Climbers will not further damage or destabilize this sensative area, provided there is a ban on further bolting. Thank you for your consideration.**
Submit	**Submit Comments**
MM_insert	**form1**

From: Wynant, Kate
To: DIV.SFO cormpkg;
Subject: FW: public comment on federal register of 3/2/07 vol 72 #41 attached in full below
Date: Friday, March 23, 2007 5:03:23 PM

Kate Wynant | Environmental Planner

Tel: 720.406.9110 | Fax: 720.406.9114

Tetra Tech, Inc.

4900 Pearl E Circle, Ste 300W | Boulder, CO 80301 | www.tetratech.com

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-----Original Message-----
From: Joe_Stout@blm.gov [mailto:Joe_Stout@blm.gov]
Sent: Tuesday, March 20, 2007 12:25 PM
To: kate.wynant@tetratech.com
Subject: Fw: public comment on federal register of 3/2/07 vol 72 #41 attached in full below

Public commments as well as adding name to mailing list
----- Forwarded by Joe Stout/KRFO/CO/BLM/DOI on 03/20/2007 12:24 PM -----

jean public <jeanpublic@yahoo.com>
03/02/2007 11:59 AM

To
CORMPKG@BLM.GOV, AMERICANVOICES@MAIL.HOUSE.GOV
cc
COMMENTS@WHITEHOUSE.GOV, VICEPRESIDENT@WHITEHOUSE.GOV
Subject
public comment on federal register of 3/2/07 vol 72 #41 attached in full below

blm rmp glenwood springs field office

the relevant issue here is protecting this nationally
owned by taxpayer land from profiteers and rip off
artists who want to make a buck for themselves and
leave this nation bereft.

ban all oil and gas drilling
ban grazing and logging
ban new roads
ban toxic chemical spraying
ban burning since it releases fine particulate matter
which can travel thousands of miles and cause lung
cancer, heart attacks, pneumonia, strokes, asthma,
allergies, and other diseases.

change the l890 law that is presently used at blm,
which treats the u.s. as an infinite land when it is
definitely finite. such laws as the l890 law under
which blm operates brings on global warming, a hazard
to us all.

please send me a paper copy so i can comment more
fully. please extend time for the public to comment -
there is no rush here.
b.s achau
15 elm st
florham park nj 07932

>
>
> [Federal Register: March 2, 2007 (Volume 72, Number
> 41)]
> [Notices]
> [Page 9584-9586]
> From the Federal Register Online via GPO Access
> [wais.access.gpo.gov]
> [DOCID:fr02mr07-89]
>
>

>
> DEPARTMENT OF THE INTERIOR
>
> Bureau of Land Management
>
> [CO-120-1610-DO-022C]
>
>
> Notice of Intent to Prepare a Resource Management
> Plans for the
> Kremmling and Glenwood Springs Field Office and
> Associated
> Environmental Impact Statement, Colorado
>
> AGENCY: Bureau of Land Management, Interior.
>

> ACTION: Notice of intent.
>
>

>
> SUMMARY: The Bureau of Land Management (BLM)
> Kremmling
> and Glenwood
> Springs Field Office, Colorado intends to prepare
> Resource
>
> [[Page 9585]]
>
> Management Plans (RMP) with an associated
> Environmental Impact
> Statement (EIS) for the Kremmling and Glenwood
> Springs
> planning areas
> and by this notice is announcing public scoping
> meetings. The Field
> Offices will simultaneously revise their respective
> RMPs for the BLM-
> administered public lands within each Field Office
> under one EIS. The
> RMPs will replace the existing Kremmling and
> Glenwood
> Springs RMPs.
>
> DATES: This notice initiates the public scoping
> process. Comments and
> resource information should be submitted to the BLM
> within 60 days of
> publication of this notice in the Federal Register.
> The BLM will
> announce public scoping meetings to identify
> relevant
> issues through
> local news media, newsletters, and the BLM Web site
> (http://www.blm.gov/rmp/co/kfo-gsfo
>) at least 15 days prior to the first
>
> meeting.
>
> ADDRESSES: You may submit written comments by any of
> the following
> methods:
> Web site: (http://www.blm.gov/rmp/co/kfo-gsfo).
>
> E-mail: cormpkg@blm.gov.
>
> Fax: (970) 724-9590.
> Bureau of Land Management, Kremmling Field
> Office, Joe
> Stout, RMP Project Manager, P.O. Box 68, Kremmling,

> CO
> 80459.
> Documents pertinent to this proposal may be
> examined at the
> Kremmling and Glenwood Springs Field Offices.
> Respondents' comments,
> including their names and street addresses, will be
> available for
> public review at the Kremmling Field Office during
> regular business
> hours from 8 a.m. to 4:30 p.m., and at the Glenwood
> Springs Field
> Office during regular business hours from 7:45 a.m.
> to
> 4:30 p.m.,
> Monday through Friday, except holidays, and may be
> published as part of
> the EIS. Individual respondents may request
> confidentiality. If you
> wish to withhold your name or street address from
> public review or from
> disclosure under the Freedom of Information Act, you
> must state this
> prominently at the beginning of your written
> comments.
> Such requests
> will be honored to the extent allowed by law. All
> submissions from
> organizations and businesses, and from individuals
> identifying
> themselves as representatives or officials of
> organizations or
> businesses, will be available for public inspection
> in
> their entirety.
>
> FOR FURTHER INFORMATION CONTACT: For further
> information
> and[bs]or to have your name added to our mailing
> list,
>
> contact Joe Stout, Kremmling Field Office, at (970)
> 724-3003. Comments
> may be sent electronically to cormpkg@blm.gov.
>
> SUPPLEMENTARY INFORMATION: The Kremmling planning
> area
> is located in
> Grand, Eagle, Jackson, Larimer, and Summit Counties,
> Colorado. The
> Glenwood Springs planning area is located in Eagle,
> Garfield, Mesa,
> Pitkin, Rio Blanco, and Routt Counties, Colorado.
> This

> planning
> activity encompasses approximately 964,000 acres of
> BLM-administered
> public lands. The plan will fulfill the needs and
> obligations set forth
> by the National Environmental Policy Act, the
> Federal
> Land Policy and
> Management Act, and BLM management policies. The BLM
> will work
> collaboratively with interested parties to identify
> the management
> decisions that are best suited to local, regional,
> and
> national needs
> and concerns.
> The purpose of the public scoping process is to
> determine relevant
> issues that will influence the scope of the
> environmental analysis and
> alternatives. These issues also guide the planning
> process. You may
> submit comments on issues and planning criteria in
> writing to the BLM
> at any public scoping meeting, or you may submit
> them
> to the BLM using
> one of the methods listed in the ADDRESSES section
> above. Individual
> respondents may request confidentiality. If you wish
> to withhold your
> name or street address from public review or from
> disclosure under the
> Freedom of Information Act, you must state this
> prominently at the
> beginning of your written comments. Such requests
> will
> be honored to
> the extent allowed by law. All submissions from
> organizations and
> businesses, and from individuals identifying
> themselves as
> representatives or officials of organizations or
> businesses, will be
> available for public inspection in their entirety.
> Preliminary issues and management concerns have
> been identified by
> BLM personnel, other agencies, and in meetings with
> individuals and
> user groups. They represent the BLM's knowledge to
> date regarding the
> existing issues and concerns with current land
> management. The EIS will
> describe and analyze a range of alternatives,

> comprised of the No
> Action alternative (continued management) and a
> number
> of action
> alternatives, each of which will describe options
> for
> addressing the
> major issues. The major issues that will be
> addressed
> in this planning
> effort include:
> Oil and gas development;
> Range health/upland management;
> Water/riparian issues;
> Increased recreation demands and uses;
> Comprehensive travel management and
> transportation;
> High concentration of cultural sites;
> Maintaining habitat for Sage Grouse and
> Sagebrush
> obligate
> species; and
> Rapidly expanding urban interface areas.
> Issues identified through public comments will
> be
> placed into one
> of four categories:
> 1. Issues to be resolved in the plan;
> 2. Issues to be resolved through policy or
> administrative action;
> 3. Issues beyond the scope of the plan; or
> 4. Issues that have already been addressed but
> should be better
> communicated to the issue holder.
> Rationale will be provided for each issue placed
> in categories two,
> three, and four. The public is encouraged to help
> identify these
> questions and concerns during the scoping phase.
> An interdisciplinary approach will be used to
> develop the plan in
> order to consider the variety of resource issues and
> concerns
> identified. Disciplines involved in the planning
> process will include
> specialists with expertise in minerals and geology,
> forestry, range,
> fire and fuels, outdoor recreation, archaeology,
> paleontology,
> wildlife, fisheries, lands and realty, hydrology,
> soils, sociology,
> environmental justice and economics.
> The following planning criteria have been
> proposed

> to guide
> development of the plan, avoid unnecessary data
> collection and
> analyses, and to ensure the plan is tailored to the
> issues. Other
> criteria may be identified during the public scoping
> process. After
> gathering comments on planning criteria, the BLM
> will
> finalize the
> criteria and provide feedback to the public on the
> criteria to be used
> throughout the planning process. Some of the
> planning
> criteria that are
> under consideration include:
> The plans will be completed in compliance with
> the Federal
> Land Policy and Management Act (43 U.S.C. 1701 et
> seq.) and the
> National Environmental Policy Act.
> The plan will recognize valid existing rights.
> Public participation will be encouraged
> throughout the
> process. The BLM will collaborate and build
> relationships with tribes,
> state and local governments, federal agencies, local
> stakeholders and
> others in the community of interest of the plan as
> normal business.
>
> Editorial Note: This document was received at
> the
> Office of the
> Federal Register on February 26, 2007.
>
>
> [[Page 9586]]
>
>
> Dated: November 8, 2006.
> Peter McFadden,
> Acting Kremmling Field Manager.
> Dated: November 9, 2006.
> Jamie Connell,
> Glenwood Springs Field Manager.
>
> [FR Doc. E7-3627 Filed 3-1-07; 8:45 am]
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> BILLING CODE 1610-DO-P
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> Expecting? Get great news right away with email
> Auto-Check.
> Try the Yahoo! Mail Beta.
>
http://advision.webevents.yahoo.com/mailbeta/newmail_tools.html
>
>

Expecting? Get great news right away with email Auto-Check.
Try the Yahoo! Mail Beta.
http://advision.webevents.yahoo.com/mailbeta/newmail_tools.html

From: BLM Form Mailer
Date: Friday, April 27, 2007 9:08:21 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Jeff**
lastName	**Achey**
address	**1019 Palmer Avenue**
city	**Glenwood Springs**
state	**CO**
zipCode	**81601**
phone	**970 319 6388**
email	**jeff@everwave.net**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**I am a rock climber and am very interested in seeing our local climbing opportunities preserved. I know that the Thompson Creek climbing area has been a management issue and hope that full climbing access will be restored.**
Question_2	**I prefer that motorized recreation be minimized in wild areas (I interact with enough vehicles in town!), but do not favor most other kinds of restrictions, such as group size. I prefer not to see development of formal picnic or camping ares, letting people, within reason, camp and picnic where they choose.**

Question_3	**I believe that it is in the best interest to our community, in terms of our personal quality of life and attractiveness of our area to future tourism, to keep our wild areas relatively primitive, while accepting the relatively minor impacts caused by allowing free access to hikers, hunters, fisherman, climbers, skiers, mountainbikers, and boaters. I have been a rock climber for 35 years, and am particularly interested in keeping this area as friendly to climbers as it has always been.**
Question_4	**Thank you for your hard work managing our public lands!**
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Thursday, April 26, 2007 1:03:27 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Mike**
lastName	**Armstrong**
address	**326 Allison Lane**
city	**Basalt**
state	**CO**
zipCode	**81621**
phone	**948-3904**
email	**marmstrong@zbi.com**
Mailing_List	**yes**
Affiliation	**private_organization**
Other_Affiliation	**Aspen Cycling Club**
Question_1	**I would like to expand the mountain bike trails in the Crown area / Prince Creek area.**
Question_2	**Expand the number of trails. There is a lot of potential in this area that serves both Basalt & Carbondale. It would be nice to have some signage with the names of trails and difficulty level of the trail. Signage at the top and bottom with a map of the area trails and purhaps some verbage on trail ediquette.**

Question_3	**In my opinion, recreational (summer) oportunities such as the trails like Prince Creek and Mushroom Rock/Red Hill are major reasons that I choose to make my life in the valley. The opportunities in the upper and mid valley are truly unique in my experience. I consider myself a successful professional and work in Aspen. We sacrifice alot (high cost of housing) to live in this valley. For me those sacrifices are outweighed by the recreational opportunuties. It\'s what makes this valley a truly amazing place to live. Anything that we can do to add to and improve on existing opportunities will only add to this.**
Question_4	**Thanks for you help on the Mushroom Rock Area. Great work! I am a member of the Aspen Cycling Club and a member of the Basalt Bike & Ski shop team. Both organizations have trails days each summer. In the past we have worked with David Hamilton at RFOV. In the future, if you need help on trails, please contact us and we can schedule your projects as our trails day.**
Submit	**Submit Comments**
MM_insert	**form1**

May 1, 2007

To Whom it may concern:

As the BLM - Dept of Interior looks at its 20 year plan for the Kremmling resource area, please keep in mind the multiple-use concept.

Family ranchers are best able to utilize the grazing resource on the BLM lands. Thru cooperation and management plans, grazing systems can be put into place that will benefit the land, plants and wildlife species which also share in the land. Try to keep all available permits active with a grazing plan for cattle.

As off-road recreational use continues to grow, try to find areas they can use which will create the least amount of surface damage. Unfortunately, areas may have to be sacrificed to protect a larger resource area.

Timbering and mining should be considered as productive use of resources. All methods of management should be considered on the "red" forests to allow for regrowth of new trees. Mining of natural resources needs close ~~multi~~ monitoring to protect sensitive areas.

Thank you for your time and efforts as you move forward with this project.

Sincerely

Mike Abel

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Kremmling Field Office

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name John Bailey Date 5/1/07

Mailing Address Box 3392 City/State/Zip Eagle, CO 81631

Telephone (optional) 970-331-9053 E-Mail Address (optional) JBailey@Vailresorts.com

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☑ No ☐

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

☑ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

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

The BLM wants to hear from you!

The Kremmling and Glenwood Springs Field Offices are committed to listening to and learning from our neighbors, friends, and stakeholders, each of whom belong to a *community of interest* defined by a common concern for the future of our public lands. Your answers to the following questions will be helpful at this point in the planning process, as are any other comments. Thank you for taking the time to provide your input.

1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

- Hackett Gulch & Skillman Gulch area need motorized control. Motorcycles are destroying fragile soil. Strong non-motorized recreation use area close to town.
- Eagle Eagle trails need to be non-motorized since they are so close to town.

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

Hackett Gulch is accessed through Spring Creek by motorcycles. Trails need to be non-motorized like Fruita area trails. Area set off by Gypsum should be motorized.

(Continue your comments on the other side.)

Public comments submitted, including names and street addresses of respondents, will be available for public review at the Glenwood Springs and Kremmling Field Offices during regular business hours (8:00 AM to 4:30 PM), Monday through Friday, except holidays. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be made available for public inspection in their entirety.

MAY-2-2007 05:34A FROM: TO:919707249590 P.1

3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

These high use areas by non-motorized recreationalist will continue to grow. Eagle grows and so does non-motorized use. Users from outside town are coming to use the trails like Frisita.

4) Any other issues, comments, or suggestions?

Change will be hard to manage at first. Hardscrabble is a large area so defining a line will be difficult. Providing alternative motorized use areas will be important.

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

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PO Box 68
Kremmling, CO 80459

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BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

From: BLM Form Mailer
Date: Friday, April 27, 2007 1:58:46 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Michael**
lastName	**Benge**
address	**PO Box 1972**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	**970 704-1442**
email	**mbenge@bigstonepub.com**
Mailing_List	**no**
Affiliation	**individual**
Other_Affiliation	
Question_1	**Rock climbing in Thompson Creek.**
Question_2	**I would like to see unrestricted rock climbing access to the area.**
Question_3	**The area is a fantastic local resource, but by nature will not draw huge numbers of people.**
Question_4	**Climbers are traditionally good land stewards, and the local involvement of climbers will assure proper resource management.**
Submit	**Submit Comments**
MM_insert	**form1**

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name JACK BOMBARDIER Date 4/17/07

Mailing Address 14503 COLORADO RIVER ROAD City/State/Zip GYPSUM CO 81637

Telephone (optional) 970-524-1440 E-Mail Address (optional) JACKBOMBARDIER@HOTMAIL.COM

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☒ No ☐

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

☒ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

Name of organization, government, group, or agency (if applicable) ALSO - I RUN FLOAT TRIPS BELOW BURNS D/B/A CONFLUENCE CASTING

The BLM wants to hear from you!

The Kremmling and Glenwood Springs Field Offices are committed to listening to and learning from our neighbors, friends, and stakeholders, each of whom belong to a *community of interest* defined by a common concern for the future of our public lands. Your answers to the following questions will be helpful at this point in the planning process, as are any other comments. Thank you for taking the time to provide your input.

1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

I AM INTERESTED TO SEE IF THE "LOWER" UPPER COLORADO RIVER WILL RECEIVE "WILD & SCENIC" STATUS

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

I WOULD LIKE TO SEE THE SECTION OF THE COLORADO RIVER BELOW McCOY STAY PRETTY MUCH THE WAY IT IS!

(Continue your comments on the other side.)

Public comments submitted, including names and street addresses of respondents, will be available for public review at the Glenwood Springs and Kremmling Field Offices during regular business hours (8:00 AM to 4:30 PM), Monday through Friday, except holidays. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be made available for public inspection in their entirety.

3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

4) Any other issues, comments, or suggestions?

THE COLORADO RIVER VALLEY BETWEEN STATE BRIDGE & DOTSERO IS A UNIQUE AND BEAUTIFUL RESOURCE. IT HAS SOMEHOW ESCAPED DEVELOPMENT PRESSURE & BEING OVERWHELMED BY RECREATION & EXTRACTION INTERESTS. I DO A LIMITED AMOUNT OF FLOAT FISHING TRIPS ON IT & I NEVER TIRE OF EXPOSING NEW PEOPLE TO THE BEAUTY & SECLUSION OF THE AREA.

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

GLENWOOD SPRINGS, CO 81601 PM 07 MAY 2007

ALWAYS USE ZIP CODE

USA 39

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BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

From: BLM Form Mailer
Date: Saturday, April 28, 2007 10:25:29 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response	
username123	
firstName	**Matt**
lastName	**Booth**
address	**205 Welch Dr #903**
city	**Lyons**
state	**CO**
zipCode	**80540**
phone	**303 823 5537**
email	**erdvm1@msn.com**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	
Question_2	
Question_3	
Question_4	**I highly support having the Upper Colorado designated Wild and scenic and being protected**
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Friday, May 11, 2007 3:14:49 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response	
username123	
firstName	**Ellie**
lastName	**Caryl**
address	**3289 Cooley Mesa Road**
city	**Gypsum**
state	**CO**
zipCode	**81637**
phone	
email	
Mailing_List	**yes**
Affiliation	**Citizens_Group**
Other_Affiliation	
Question_1	**Controlling motorized uses to remain on designated routes. Some areas have been dramatically affected (i.e. Red Hill in Gypsum) and trashed (East Eagle).**
Question_2	**Barriers, signage, occassional patrols in areas subject to abuse. Take oil and gas windfalls and route to recreation.**
Question_3	**More sensitive use of the landscape.**
Question_4	
Submit	**Submit Comments**
MM_insert	**form1**

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name LUCY CERISE Date 4-11-07

Mailing Address 3006 EMMA RD City/State/Zip BASALT CO 81621

Telephone (optional) 927-3217 E-Mail Address (optional) _____

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☑ No ☐

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

☑ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

Name of organization, government, group, or agency (if applicable) rancher / permittee

The BLM wants to hear from you!

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1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

On the Crown in the G.S. FO. area my husband and I hold a permit for grazing. We are concerned about the future uses of this area.

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

In the fall After we take our cattle off the permit, we watch as the Crown is over run with hunters on ATV's. The whole area is overwhelmed where anything that moves is shot. There is

(Continue your comments on the other side.)

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a lot of off road use during this time.

3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

With management of the fall big game hunting and limiting the off road use, there will be less erosion. Hopefully, the fencing that we maintain won't be damaged / cut by hunters

4) Any other issues, comments, or suggestions?

We have trouble with gates left open. Also, we can't maintain a certain fence because it is located in a deep gully that's seen erosion. This fence could be re located.

If the impacts from hunting were reduced we would be happy.

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

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Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name Jerry Clazasser Date 4/30/07

Mailing Address P.O. Box 654 City/State/Zip Grand Lk, CO 80447

Telephone (optional) 970-627-8449 E-Mail Address (optional) jerry-debi@rkymtnhi.com

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☒ No ☐

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

☒ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

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

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1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

Access to BLM lands near Grand Co. Rd 60 (Little HO Road).
Preserve public lands even in small acreage as necessary to create buffer to explosive development.
Wildlife habitat and cultural preservation should be top priority.

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

Do not alter landscape except for habitat improvement
Only trade BLM land above Granby land fill if conservation easement goes withit.

(Continue your comments on the other side.)

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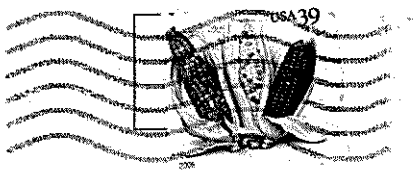
4) Any other issues, comments, or suggestions?

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

DENVER CO 802
30 APR 2007 PM 4 T



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BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

80459-80068 8001

From: BLM Form Mailer
Date: Thursday, April 26, 2007 9:34:25 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Jeremy**
lastName	**Cohen**
address	**1493 County Road 106**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	**970-963-2006**
email	**jcohen@crms.org**
Mailing_List	**no**
Affiliation	**individual**
Other_Affiliation	
Question_1	**I am concerned about climbing access. Specifically I am interested in working toward open access at the thompson creek climbing area**
Question_2	**I would like to see the Special designation re-examined as it seems that the current designation at Thompson creek is no longer applicable or relevant**
Question_3	**I am a responsible, caring low impact user of the BLM lands. Although I understand the complexities of site management I believe climbers are positive users that keep impact to a minimum.**
Question_4	
Submit	**Submit Comments**

ATTENTION Bureau of Land Management dated 4/30/07
Kremmling Field Office
Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

via e-mail to cormpkg@blm.gov & fax(970)724-9590

** CONFIDENTIALITY REQUESTED **

In response to question four on the USDI, Bureau of Land Management -- Kremmling and Glenwood Springs Field Offices Resource Management Plan form: "4) Any other issues, comments, or suggestions?"

Regarding trail classifications:

If trails/roads become classified as "closed" to all off-road vehicles, then how does a ranch manage and maintain fences and care of livestock on BLM land?

It is virtually impossible to tell a cow to come to a road if she is injured or sick. Water holes may be located in an area that become classified as "closed" (under the new plan), how then would one be able to determine if ones livestock water was okay or not okay? What happens if repairs or improvements need to be done to make water available for ones livestock? Lets not forget about fencing, fencing is an on-going job -- it does not go away. Wildlife, weather and age keeps any rancher busy fixing fence. It seems ridiculous to think that anyone is expected to fix -- say a mile of fence -- hauling materials, posts, wire, etc. by horseback if the trail/road (always used in the past) was now classified as "closed."

On page 11 of the Public Scoping Meetings packet, it states that KFO collects about $89,000 per year in Special Recreation Permits/Fees ... this includes upland hunting outfitting. If trails/roads become classified as "closed" then BLM would be prejudicing hunters that are older that rely on roads and outfitters to hunt, "to recreationalize," on public property ... this would cause hunting to be for the young and fit crowd only. (1) This would cause elimination of monies and the trails/roads would still require monitoring -- costing money! (2) This would be prejudicing against older / not so fit hunters which definitely are a big portion of guided hunts and monies brought into the small communities during the hunting seasons.

If trails/roads become classified as "closed"; how is BLM going to identify the status of each trail/road? If signs are put up at every trail/road, BLM would then be degrading the natural view and beauty of the environment of which is one of the said purposes of declassifying some trails/roads. It would seem to reason that these trails/roads would still be in need of monitoring; therefore, there will still be "travel" on these trails/roads by BLM officials ... what then is gained?

Public land is public land and should not be open to sale. If however, an area of BLM land is determined to be sold, does the adjacent land owner with the current BLM lease get the first opportunity to buy? There are areas of BLM that have only markers identifying land boundaries, if land belonging to BLM is sold and not to the adjacent land owner, there becomes an issue of fencing between the separate land owners.

Regarding Grazing Practices and Guidelines: In my opinion,

grazing practices should be considered uniquely as per area, the number of cow/calf pairs, related weather issues and forage availability. Most ranchers apply guidelines and manage their livestock and grazing practices accordingly. If there is a problem then BLM should step in and resolve any problem as an individual situation.

On page 31 of the Public Scoping Meetings packet regarding Wildland Fire Management, Category A and Category B state that fire suppression in these areas will be aggressive. Category C and Category D do not state how fire suppression will be handled. Unless it is a controlled, scheduled burn, fire suppression should be practiced period! Any fire needs monitored and put out so as not to turn into a Category A or Category B.

Regarding Forests & Pine Beetles: BLM should work with local communities and with loggers to remove sick and downed trees. If the community needs assistance in locating an outlet to sale such trees, BLM should step in and help. The main focus should be improving forest health as quickly as possible.

Regarding Oil & Gas on BLM land: For me, this topic needs discussed and outlined clearly. I believe that BLM should consider each area as separate, do not categorize and lump into one specific plan. Each area would be different as far as wildlife/ habitat issues, formation issues, land ownership issues, and legal issues -- each needs different attention. Geological surveys need to be completed and mapped to determine what formation the pools of oil and gas are located in and identify whether the area is worthy of producing. If it's determined that the area is capable of good production and the area includes private/ and BLM land then consideration for unitization should be followed along with strict compliance with the Oil & Gas Commissions Rules & Regulations. Question: What more is being discussed regarding coal production besides the fact that development is possible?

From: BLM Form Mailer
Date: Friday, April 27, 2007 10:07:46 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response	
username123	
firstName	**Bob**
lastName	**Cornez**
address	**20 Easy Street**
city	**El Jebel**
state	**CO**
zipCode	**81623**
phone	
email	**rcornez@gmail.com**
Mailing_List	**no**
Affiliation	**individual**
Other_Affiliation	
Question_1	**Would like to keep responsible access open to Thompson Creek for rock climbing.**
Question_2	**Support citizen trail improvment works to allow access without arbitrary numbers limits.**
Question_3	**All bebefits listed are provided by climbers.**
Question_4	**Allow responsible, non-motorized access in the Thompson Creek area for climbers.**
Submit	**Submit Comments**
MM_insert	**form1**

4/13/2007

Megan Dean
1136 Ct. Rd 129
Glenwood Springs
Colorado 81601

Dear Joe Stout and the BLM Agency,

In regards to the Resource Management Plans that are up for review and evaluation, I would like to express my interest and desires on this project. The Bureau of Land Management has a daunting task in front of them and I am grateful for the opportunity as a resident of Garfield county to be able to comment on this important process.

I am a motorcycle riding, four wheeling, snowmobiling kind of girl. I bought my first duel sport bike at the age of 22 and grew up on a four wheeler. While I embrace my love for speed and engine power, I realize that there are certain areas that should not be disturbed. There are certain areas that we have to fight to protect and save so that my daughter can experience what true wilderness is.

Our national forests and open spaces are one of the unique characteristics of our great country. It is up to the people, the federal agencies and guardians, and the democratic process to ensure their survival for future generations. In recent years I have witnessed a gold rush mentality, and sat through meetings where oil and gas representatives have told the people of Colorado, that regardless of their concerns and wishes, they would have priority when the BLM lands came up for review and possible leasing. I ask that as government officials with pressure from multiple sources and groups that you find the balance that this area so desperately needs. Land that falls under private domain is gobbled up for development so quickly that our towns and cities can't build the infrastructure needed to support this increase in population. Elk herds have joined the real estate quest. Luckily, through the foresight of past leaders, ecologists, and conservationists, we have set aside a small percentage to remain intact. This allows for healthy ecosystems, riparian areas to filter and protect our rivers, and a knowledge that their are still wild and free places between our ever growing cities. These places are essential to not only the human spirit, but to the survival of numerous species.

Some things can not be measured with money, unfortunately it is human nature to take and make profitable what one can. It is up to your agency to protect our federal lands and not sacrifice their pristine quality for a last attempt to subsidize a dying and archaic system that will soon be a energy source of the past. We have the technology to use renewable resources that have a smaller impact on our ecosystems. Lets create a fair playing field. We live a a closed system, it us up to us and you to protect it for the future.

Thank you for your time and effort,

Megan Dean

RECEIVED
APR 18 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

From: BLM Form Mailer
Date: Tuesday, May 01, 2007 10:01:15 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**John**
lastName	**DiCuollo**
address	**341 Cleveland Place**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	**970-963-4873**
email	**jld@backbonemedia.net**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**Thank you very much for your efforts to improve and create mountain biking/ hiking trails in the Carbondale/ Glennwood area. I also appreciate your efforts to work with climbers with the ongoing Thompson Creek drainage area for rock climbing. With regards to mountain biking, would like to know if there are plans to improve and increase trails in the Crown area? With regards to climbing in Thompson Creek, I am slightly worriued that removing bolts from climbs could open up more problems than help the situation.**

Question_2	**Areas like Red Hill have matured and retained their natural beauty through the years (despite seeing high user traffic)....that place should be used as a model for other areas that you are making changes to.**
Question_3	
Question_4	**Outdoor recreation areas catering to mountain bikers and climbers are very beneficial to Carbondale. This town is comprised of many enthusiasts with these respective sports.....it will open up the door to new business opportunities such as tourism, restaurants, lodging, etc.**
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Thursday, April 26, 2007 1:00:57 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**David**
lastName	**Downing**
address	**636 Bridgewater Place**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	**970.963.4558**
email	**dave@snowman-x.com**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**Hi. My main area of use is in the Glenwood Field Office. My biggest issue or concern would be regarding mountain biking in and around Carbondale. Specifically Red Hill and the Crown area. Access to these two areas are part of what make living in Carbondale so great to me. I can ride 2 trails, accessible from my home without use of a vehicle, that are as good of quality as anything I\'ve ridden all over the country. To block access to these areas would be a terrible loss for a few reasons: - it would require more driving to ride my bike as I would have to travel further up and down valley, in turn causing more traffic and pollution to an area already experiencing problems**

	with both. - it would have a potential cost to the community financially. This close, easy trail access brings in people from around the valley, the state, and even the country who then put money into the local economy when visiting local bike shops, eateries, hotels and more. Making Carbondale a larger bike destination with more trail development is has huge opportunity for a town try to become more sustainable (see Fruita, CO as an example of great mountain bike development turning into community profit). - My general quality of life would greatly decrease with the lose of access to one or both of these areas. Together they offer more trails to spread out users, they compliment each other well in diversity and difficulty of riding, allowing both novices and experts to fully challenge themselves as they wish. As housing cost increase in the valley, little things like trail access keep me here. I haven\'t found another area yet that can match it.
Question_2	**For the Crown Area, having this area actually governed and included in the Resource Management Plans would make it easier to organize and hold projects such as trail maintenance days. I would love to see this area improved upon and build more. The Crown Area has so much potential for some more trails, and trails that will need to be maintained, but as a rouge area, this is more difficult.**

Question_3	**I list benefits above in my issues statement, including community sustainment, reduces vehicle usage and quality of life. In addition, additional trails (in my opinion, having specific use trails to avoid conflict) allows the community greater outdoor access close to home when a longer trip may not be an option.**
Question_4	**SAVE OUR TRAILS.**
Submit	**Submit Comments**
MM_insert	**form1**

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name Bob Egizi Date 4/27/07

Mailing Address PO Box 1174 City/State/Zip Edwards CO 81632

Telephone (optional) _____ E-Mail Address (optional) begizi@cordillerametro.org

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☒ No ☐

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

☒ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

Name of organization, government, group, or agency (if applicable) n/a

The BLM wants to hear from you!

The Kremmling and Glenwood Springs Field Offices are committed to listening to and learning from our neighbors, friends, and stakeholders, each of whom belong to a *community of interest* defined by a common concern for the future of our public lands. Your answers to the following questions will be helpful at this point in the planning process, as are any other comments. Thank you for taking the time to provide your input.

1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

1) Sale of BLM Land - Do not sell BLM Land to Private Parties, especially developers and Piney Valley Trust. They are not good neighbors and shut down access to adjacent public lands

2) Aerial Shooting of Predators - The gov't should not be shooting predators on public lands, especially for people who run livestock just to have Ag status

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

① Don't sell public lands unless there is a benefit to the public above and beyond the cash flow. Stop aerial shooting - the money saved could help make up funds for lands not sold

② Enforce Rules - All to often BLM (And USFS) start the review process, new programs etc to address proplems that would not be problems if rules were enforced - i.e. ORV's. We wouldn't have miles & illegal roads trails to "Manage" if we didn't allow them to begin with

(Continue your comments on the other side.)

Public comments submitted, including names and street addresses of respondents, will be available for public review at the Glenwood Springs and Kremmling Field Offices during regular business hours (8:00 AM to 4:30 PM), Monday through Friday, except holidays. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be made available for public inspection in their entirety.

3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

By not selling BLM parcels we keep open space. Sometimes the smaller parcels help assure large tracts don't get shut down

4) Any other issues, comments, or suggestions?

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

Place First Class Stamp Here

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name CHARLES M. FULLER Date _____

Mailing Address 6225 Montarbor Dr. City/State/Zip Colorado Sprgs. Co 80918

Telephone (optional) 719 535-9050 E-Mail Address (optional) cfuller200@aol.com

Would you like to be added to this project's mailing list to receive future project-related information? (Yes) No ☐

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

☒ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

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

The BLM wants to hear from you!

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1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

See Attachment

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

(Continue your comments on the other side.)

Public comments submitted, including names and street addresses of respondents, will be available for public review at the Glenwood Springs and Kremmling Field Offices during regular business hours (8:00 AM to 4:30 PM), Monday through Friday, except holidays. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be made available for public inspection in their entirety.

3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

4) Any other issues, comments, or suggestions?

Mr. Charles M. Fuller
6225 Montarbor Dr.
Colorado Spgs, CO 80918-4874

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

COLORADO SPRINGS CO
PM
2007

RECEIVED
MAY - 2 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

80459-0068 8001

(1) Kremmling FO; Fuller Ranch, Jackson County, T6 & 7 N R 80 & 81W.

After review of your concept of possible changes in resource management , my leading question was "How does this affect the Fuller Ranch". My initial conclusion without further information was "Probably very little".

The three main parcels of BLM within ranch boundries are S36, T7N, R81W, and S1, T6N, R81W and a part of S31, T7N, R80W.

These parcels are largely open sage brush land with no ponds, rivers or large stands of timber. They are not conducive to hunting or fishing. Opening them up for ATV, OHV and trail bike recreation is not suggested because of a lack of surrounding scenery and sensitivity of the surface which makes it prone to erosion. In short, it is being used in the best way possible, for seasonal livestock grazing.

There are other small bits and parcels of BLM within ranch boundries. None are clearly defined by fencelines or any other means. Some extend into soft meadow land and accessible only through private property. Sale of them to other persons for vacation property is not suggested because of their limited size, wintertime snow cover and springtime floods.

BLM's proposal to sell some of these parcels to private individuals would be attractive if they are offered first to the land owners that held grazing leases on them. On the Fuller Ranch they could then be used the same way they have been for three generations.

Oil and gas development on ranch BLM should not pose a problem. State and Federal regulations covering this development seem to be adequate to protect the environment and adjacent private land. Energy companies procedure of unitizing areas of development seems to be fair and equitable.

Charles M. Fuller

Charles M. Fuller

From: BLM Form Mailer
Date: Monday, April 30, 2007 6:57:59 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**George**
lastName	**Fuller**
address	**POB 2346**
city	**Glenwood Springs**
state	**CO**
zipCode	**81602-2346**
phone	**970-945-8271**
email	**gwfuller@sopris.net**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**Red Hill, Carbondale, should remain open to mountain bikes and the North side loop should be expanded. Lookout Mountain, Glenwood Springs, particularly Forest Hollow and Boy Scout trails, should remain open to mountain bikes. Price Creek area, Carbondale, beyond the pavement end on Prince Creek Road, should be developed for and remain open to mountain bikes. Dinkle Lake to Hay Park and Capital Creek, Carbondale and Emma, outside the Wilderness Area, should remain open to mountain biking. Basalt Mountain Road and 1909 Trail, El Jebel, should remain open to mountain biking.**

Question_2	**Limit grazing as cattle destroy the native vegatation, increase briars and weeds, and destroy the trails.**
Question_3	**This area is primarily tourist dollar driven. Many residents do not feel they should change for the outsiders to use \"their\" lands, but \"their\" dollars fuel the valley\'s economy in a very sustainable manner. Most visitors are repeat customers and will return for our world class recreation oportunities.**
Question_4	
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Monday, April 30, 2007 7:47:30 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Leslie**
lastName	**Fuller**
address	**P.O. Box 2346**
city	**Glenwood Springs**
state	**CO**
zipCode	**81602**
phone	**970 945 8271**
email	**lesvaught@cs.com**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**I have heard rumors of potentially closing the Red Hill Recreation area and the Boy Scout trail to mountain bikers. This would be a huge mistake. These are well known and loved mtn. biking trails.**
Question_2	**I would insist that all dogs be leashed. The number of dogs running loose on Red Hill (aka Mushroom Rock) is dangerous for all, and destroys the fragile soils along the trail sides. Also, please do not allow horses on any of the Carbondale or Glenwood trails. They destroy the trail, bring black flies, etc.**

Question_3	**As the population of the Roaring Fork Valley grows, recreation areas will be more heavily used, and keeping dogs under control and not allowing horses will make it a more enjoyable experience for hikers and bikers alike.**
Question_4	**I realize that a small minority of mountain bikers have given the sport a bad name. I think the majority of us are considerate, conscientious people who yield the trail to pedestrians. Please do not punish all of us by closing trails to biking because of the actions of a few.**
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Monday, April 30, 2007 9:25:03 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Cassia**
lastName	**Furman**
address	**514 Lakeside Drive**
city	**Basalt**
state	**Colorado**
zipCode	**81621**
phone	
email	**cassia.furman@gmail.com**
Mailing_List	**no**
Affiliation	**individual**
Other_Affiliation	
Question_1	**I live in the Roaring Fork Valley (Glenwood Springs FO). Over the past decade or so, the population in this area has increased steadily, along with use of BLM land. One major success has been the Red Hill Special Resource Management Area, a user area managed cooperatively by BLM and the Red Hill Council, of which I am a member, along with other local entities. Red Hill is a source of community pride and provides a great outlet for hikers, mountain bikers, kids, and families and serves as a focal point and meeting spot for the Carbondale area. Unfortunately, the area could some day soon be in danger of being loved to death, as the soil system is extremely fragile. I feel**

	designation of other areas, such as Prince Creek, could take pressure off Red Hill and add to the BLM\'s success in the area.
Question_2	**The traditional BLM focus on mineral extraction and cattle grazing is quickly becoming outdated in the Roaring Fork Valley. With mineral development exploding in Western Garfield County, there is huge support in the community for preserving the wild lands we have left for wildlife habitat and limited recreation, i.e., non-motorized use. In my area, I think the BLM should reexamine how various user groups and activities really impact the area and look for ways to cooperate with citizen groups such as has been accomplished with the successful Red Hill model. People in this area care very much about the land and are willing to work with BLM to ensure it is preserved in a manner that will support the agency\'s mandates and the public\'s wishes. Specifically, I am a proponant of designating the Prince Creek/Crown parcel as a SMRA. Additionally, I would like to see other areas studied for recreation expansion, i.e., the back side of Red Hill for additional trails, Thompson Creek (climbing), etc. I think there are enough concerned citizens here to make it work, and demand is cetainly high.**

Question_3	**The economic benefits to the Town of Carbondale and the surrounding area created by the popularlity of mountain biking are clear. The area is rapidly becoming known as a mountain biking destination, and for good reason-- the trails are great. Most lie on BLM land. BLM has received great publicity from the Red Hill project and now enjoys a solid relationship with the local community (thanks to the great local BLM staff). As far as promoting non-motorized recreation use in general, it is far more sustainable than mineral extraction, motorized use, or grazing. The Roaring Fork Valley is an area of high visual integrity, and the BLM will play a major role in whether the wildlife, growing population, and wild lands remain viable for now and in years to come. Recreational use should be the new focus for this area, as it most accurately reflects the \'highest and best use\' for this land.**
Question_4	**Thanks to the local BLM managers for their great communication with the community here. We look forward to continuing through the RMP process, preserving the integrity of existing uses, and expanding the opportunities available in our area while preserving \'wilderness\' characteristics as much as possible.**
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Saturday, April 28, 2007 10:15:47 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Derek**
lastName	**Hanrahan**
address	**1493 County Road 106**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	
email	**derek.hanrahan@gmail.com**
Mailing_List	**yes**
Affiliation	**Citizens_Group**
Other_Affiliation	
Question_1	**I am concerned about the upcoming changes being considered for the Thompson Creek area. Specifically, regulations that may affect access to the area by rock climbers.**
Question_2	**I advocate allowing the Roaring Fork Climbers Coalition, which has already engaged the appropriate BLM authorities & is seeking to work with them, a leadership role in the formulation & administration of the management plan for this valuable recreation area.**

Question_3	**As a user group with a vested interest in the best balance between recreation & preservation at Thompson Creek the RFCC represents a benefit to the BLM in that we have the organized resources, means & intent to best affect a positive outcome for all interested parties.**
Question_4	**As a local resident & user of this valuable natural resource I sincerely appreciate this opportunity to work together with the BLM in achieving an outcome that is equitable to all concerned parties.**
Submit	**Submit Comments**
MM_insert	**form1**

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name Michael Hohnholz Date May 20, 2007

Mailing Address 31095 NCR103 City/State/Zip Jelm Wyo 82063

Telephone (optional) 970-435-5719 E-Mail Address (optional) _____

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☒ No ☐

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

☒ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

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

The BLM wants to hear from you!

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1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

Laramie River area of Kremmling F.O. We have seen a few sage grouse near our home the last several years. Also north of us into Wyoming a few miles. Area of concern: 4-wheeler or other vehicles on BLM or forest land.

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

Less use of vehicles where ruts will cause erosion.

(Continue your comments on the other side.)

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3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

Saving soil, habitat for plants and animals.

4) Any other issues, comments, or suggestions?

The division of Wildlife is the main reason, or at least one reason for the demise of the sage hens. "Oh hunting wont hurt their numbers." What do they think happened to the passenger pigeon?

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

CHEYENNE WY 820
21 MAY 2007 PM 1 T

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

RECEIVED MAY 22 2007

80459*0068 B001

From: BLM Form Mailer
Date: Monday, April 30, 2007 9:56:53 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Molly**
lastName	**Irwin**
address	**913 Village Rd.**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	
email	
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**As an avid user of several of the BLMs lands in the Glennwood and Carbondale areas, my primary concerns include increased use with little or no increase in space available.**
Question_2	**Changes I would consider would be in terms of trail maintaince improvements in order to withstand the increased useage. I would not like to see a limit put on the areas as far as numbers go, but maybe down the line sometime a reservation system may need to be implemented for large (10 or more) groups.**

Question_3	**The benefit I see with my limited comments is that it will allow continued use of the areas in light of the growing population to sustain the quality of life and nearby recreational oppertunities that draw people to the area in the first place.**
Question_4	**I am currently quite happy with my experiences on Red Hill and the Crown area. As an avid hiker, horseback rider and occasioal bike rider, I love having such close and easy access to both places. I appreciate the work and improvements that have taken place thus far. Thank you!**
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Friday, April 27, 2007 3:05:13 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Jeff**
lastName	**Jackson**
address	**631 Colorado Ave.**
city	**Carbondale**
state	**Colorado**
zipCode	**81623**
phone	
email	
Affiliation	**individual**
Other_Affiliation	
Question_1	**I\'m interested in seeing the climbing in Thompson Creek opened.**
Question_2	**This area is right off the road and the bolts that have been disabled should be restored. Climbers have indicated their willingness to monitor the area, maintain the trail etc.**
Question_3	**Their is an obvious benefit to the recreational climbers that populate Carbondale and the immediate areas.**
Question_4	**Please allow climbers access to this resource. To close or limit access to this area seems wrong-headed and foolish.**
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Friday, April 27, 2007 11:53:29 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**barbara**
lastName	**jaksa**
address	**210 main street**
city	**carbondale**
state	**colorado**
zipCode	**81623**
phone	**970.963.9178**
email	**bjaksa@hotmail.com**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**i ride/hike the prince creek/crown blm land 3-4 times a week. with the increase of recreational use and construction trucks, things are becoming tight. the mix of traffic and recreational use is coming to a head, as \"rush hour\" for the construction trucks presents a danger for cars, bikes and hikers...and also destroys the road itself. another area of conflict, the use of blm land for hunting...i have witnessed more than once poor judgement by hunters/shooters. i witnessed 3 guys setting up bottles and cans at a trail head and proceed to begin target shooting even after i pointed out they were at a blind trail head. two hikers emerged and ended up**

	calling 911 because these guys still were shooting.
Question_2	time to stop the hunting up there. i understand blm land and such, seasons and all of that. but the idiocy that i have seen displayed by hunters (i have more stories) convinces me that they should be further from civilization...the land is utilized too much to control the gun and one accident is not worth their right to \"hunt/kill\". severe fines for construction traffic, mitigation/offsets for road damage. keep this as a close and local use of BLM land and recreation (how did killing an animal get mixed in with recreational use of land? is killing considered a \"recreational\" use of the land??? too different mind sets with not enough room to mix.
Question_3	i am against hunting/gun use in a populated area. period. no seasonal use that gets confusing for those who are not hunters...i would never think of checking out hunting seasons up there, let alone people who are even more removed from that kind of mindset. why not start to think of it as a recreational usage piece of land, connecting willitz/ emma and carbondale through the crown. that would be amazing. instead of having to use roads/car to travel to willitz for lunch, a trail over the crown....
Question_4	appreciate red hill and all the trail maintenance....
Submit	Submit Comments
MM_insert	form1

From: BLM Form Mailer
Date: Monday, April 30, 2007 12:05:15 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Ryan**
lastName	**Jennings**
address	**103 Indica Way**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	**970-948-7215**
email	**rjennings@sopris.net**
Mailing_List	**no**
Affiliation	**Citizens_Group**
Other_Affiliation	
Question_1	**Concern for the future of climbing in Thompson Creek.**
Question_2	**The Thompson creek area would benefit from a better designed trail and a restroom at the trailhead. This trailhead is also used by hikers, fisherman, and trail runners as well as off road inthusiasts like 4wheelers and motorcyclists.**

Question_3	**Thompson creek is the only local climbing area that the people of Carbondale and surrounding area have to enjoy our sport nearby. This area is excellent for meeting friends for a peacefull afternoon in the outdoors. In the future perhaps CRMS could teach classes on climbing hear. I personally like to take my newborn son there to watch me climb and learn about the outdoors.**
Question_4	**Mainly I see this as being a climbing area for the locals that will never become very popular with people from out of town. Most people will continue to go to Rifle to climb bigger rocks but us locals appreciate having an area that we can go to after a day of work. This is what Thompson Creek is used for by climbers. I do feel that it would be beneficial to someday have a restroom and some trail work would really help the area. I feel the current allowed 9 people per day is a bit low. If allowed I don\'t think the area would ever see more than 20 people a day. Please allow us to climb in this area in the future. Climbers are a very responsible group and we often help to fix trails and make areas better in general. I was out there the other day and was attacked by 4 wheelers on the way in but once I got back there it was such a peacefull area that I would love to take my son to in the coming years as he gets old enough and I can teach him about the ecosystem as we hike to and from the climbing. Thank you, Ryan Jennings Bray Real Estate**

From: BLM Form Mailer
Date: Saturday, April 28, 2007 8:53:21 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Jim**
lastName	**Jones**
address	**1223 Woody Creek plaza**
city	**Woody Creek**
state	**CO**
zipCode	**81627**
phone	
email	
Mailing_List	**no**
Affiliation	**individual**
Other_Affiliation	
Question_1	**I\'m concerned about these climbers in the Thompson Creek area. Especially their putting up climbing routes without permission, and now you are rewarding them by letting them continue this activity. To me it is the height of arrogance to alter public lands without contacting the proper authorities. Why can\'t they climb up Independence where there are hundreds of already establishes routes. That\'s my 2 cents.**
Question_2	**No climbing, punish their impudence.**
Question_3	**Keep the place from being ruined by climbers camping on the local roads in the Thompson Creek area.**
Question_4	
Submit	**Submit Comments**

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name KAY KAYSER - MEYRING Date April 30, 2007

Mailing Address S.R. 700 City/State/Zip Walden, Co 80480

Telephone (optional) 970-723-4239 E-Mail Address (optional) _____

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☒ No ☐

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

☒ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

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

The BLM wants to hear from you!

The Kremmling and Glenwood Springs Field Offices are committed to listening to and learning from our neighbors, friends, and stakeholders, each of whom belong to a *community of interest* defined by a common concern for the future of our public lands. Your answers to the following questions will be helpful at this point in the planning process, as are any other comments. Thank you for taking the time to provide your input.

1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

To keep King Mtn multiple use - grazing - hunting - Back packing - timber - Would like to see timber harvested - Travel management to be two weeks prior to grazing date for ranchers or permittees to use existing roads for maintenance of fencing, water + salt management - Travel for permittees + administrative use on roads existing -

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

(Continue your comments on the other side.)

Public comments submitted, including names and street addresses of respondents, will be available for public review at the Glenwood Springs and Kremmling Field Offices during regular business hours (8:00 AM to 4:30 PM), Monday through Friday, except holidays. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be made available for public inspection in their entirety.

From: BLM Form Mailer
Date: Friday, April 27, 2007 10:08:06 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Michael**
lastName	**Kennedy**
address	**P.O. Box 1383**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	**970 963-2188**
email	**mkennedy@sopris.net**
Mailing_List	**yes**
Affiliation	**Citizens_Group**
Other_Affiliation	
Question_1	**I\'m concerned with the status of the Thompson Creek ACEC near Carbondale (Glenwood Springs FO), specifically regarding the use of parts of that area for rock climbing. I am a climber and a member of the Roaring Fork Climbers Coalition, and I support the continued use of the Thompson Creek area for rock climbing. I\'m also a hiker, mountain biker, kayaker, and skier. I support the use of BLM lands for human-powered recreational activites, and within limits, for motorized use (i.e. dirt bikes, ATVs, 4WD vehicles on established roads).**

Question_2	**I would support modest improvement of the Thompson Creek trail; the area gets little enough traffic that a really well-developed trail isn\'t needed. Other than that I\'d leave the area alone. The Thompson Creek climbing is within a half mile of the road. You can hear ATVs and other vehicles while you are at the crag. It is still a very nice place to be. I believe the Thompson Creek area will retain its rural character even with increased use. The interim agreement between the BLM and the RFCC calls for a voluntary limit of 9 climbers at the crag at any one time - we could easily have twice that number without negatively impacting the experience of the climbers or the experience of people hiking on the trail (the climbing is out of view of the trail). I would support a less-restrictive management prescription for Thompson Creek, particularly in regards to the number of users. I would not support additional restrictions.**
Question_3	**The Thompson Creek crag is the closest rock climbing available to residents of Carbondale. It is a small area, of interest primarily to local climbers as a place to go after work or on weekends. As such it is a valuable recreational resource. Carbondale is a bedroom community for the Roaring Fork Valley but is fast becoming well-known for its scenic beauty and range of recreational activities (i.e. local bike paths; kayaking, sfishing, rafting on the Crystal and Roaring Fork Rivers; mountain biking on Red Hill and on the dirt roads near Thompson Creek; cross-**

	country skiing at Spring Gulch; etc., etc.) Rock climbing at Thompson Creek (as well as other nearby areas such as Redstone, the Fryingpan River valley, Independence Pass, etc.) is a valuable asset for the whole community. In addition, a number of local schools have or are developing outdoor programs. The Thompson Creek crag is an ideal venue for small school groups to learn rock climbing skills and to experience the natural environment we are so fortunate to be surrounded by. Allowing a more appropriate (higher) level of use at Thompson Creek will benefit many in the Carbondale community with very little or no impact. Indeed, more human-powered recreation within the greater Thompson Creek area will, I believe, lead to a greater sense of community investment in, and care for, the area than it currently enjoys.
Question_4	**Climbing is a well-established and appropriate recreational use of public lands, including land designated as wilderness. Climbers as a group are very conscious of their place in the natural world and take a great deal of pride in their stewardship of public lands. I\'d urge the BLM to address climbing in a reasonable and appropriate manner in whatever management actions result from the current RMP process.**
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Thursday, April 26, 2007 1:41:12 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Todd**
lastName	**Kennedy**
address	**315 Cleveland Place**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	**970 948 6054**
email	**todd551k@yahoo.com**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**Maintain existing trails and the building of new trails in exisitng recreation areas is very important to me as a trail runner and a mountain biker. The particular areas that I am concerned with are Red Hill and the Prince Creek Corridor, including the crown.**
Question_2	**I would develop a plan that allows for the development of a secondary access point for Red Hill to distribute some of the impoact, possibly from Cattle Creek Road. The additional trail building that has occured in both of these areas (Red Hill and the Crown) has been great and would love to see more well designed, well built trails expanding the nework of recreational opportunities directly from Carbondale.**

Question_3	**The benefits to building more trails ould be to bring more recreational users to Carbondale increasing busniess opportunities in town and the surrounding communities. Also expanding recreational opportunities would prevent more local recrationalists from having to get in the car and drive upvalley to access larger trail networks reducing the use of fossil fuels.**
Question_4	
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Wednesday, May 09, 2007 7:39:35 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**sherab**
lastName	**kloppenburg**
address	**PO Box 1204**
city	**carbondale**
state	**co**
zipCode	**81623**
phone	**3035211376**
email	**sherabella@hotmail.com**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**I want to encourage as much access as possible to the Thompson Creek area. I am a climber and care about how the the BLM manages this area.**
Question_2	**The access trails should be clearly marked and any use restrictions should be posted.**
Question_3	**I feel it is important to remember that rock climbers are historically very considerate, clean and conscientious land users. We are committed to working with the land management authorities, and we are passionate about what we do.**
Question_4	**Please keep Thompson Creek open to rock climbers**
Submit	**Submit Comments**

From: BLM Form Mailer
Date: Friday, April 27, 2007 9:42:41 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Alex**
lastName	**Klumb**
address	**102 W. Sopris Dr**
city	**Basalt**
state	**CO**
zipCode	**81621**
phone	
email	
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**I am a mountain biker as well as an avid hiker and climber. Maintianing and expanding trail access (especially the Red Hill and Crown areas) for all users, hikers, bikers, equestrians is paramount in my view. My gripe: Ensuring equestrians pick up after their horses. After all, we yield to them, we pick-up after our dogs for them (and others). They should be held to the same standard.**
Question_2	**Where possible, expand areas of single track - the crown loops for instance. Just as leashes are required for dogs, Require the use of colostomy bags on horses.**

Question_3	**Greater appreciation by the public of the mid-valley landscape. Greater draw of user groups to the valley, hence improving recreation, economy etc.**
Question_4	**The BLM is doing a great job in opening, maintianing and allow us to access these lands. Keep up the good work and please let me know about trail days etc. I\'m wanting to help. Thank you.**
Submit	**Submit Comments**
MM_insert	**form1**

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name Bonnie K Hilt Date 4/11/07

Mailing Address PO Box 340 City/State/Zip Kremmling

Telephone (optional) 724-3377 E-Mail Address (optional) _____

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☐ No ☒

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

☒ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

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

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1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

grazing on riparian areas
collect data on migratory bird resources in
Treatment vs. non-treated
sage brush

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

grazing in riparian areas would be stopped - fencing would be put in place.

seasonal bird people would be hired to collect data - future treatment decisions would be made accordingly.

(Continue your comments on the other side.)

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3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

4) Any other issues, comments, or suggestions?

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

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Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

From: Peggy Lange
Date: Tuesday, April 10, 2007 2:51:15 PM
Posted At: Scoping Comments 2007
Conversation: BLM, Rifle hog back
Subject: BLM, Rifle hog back

Thank you for conducting these meetings in Garfield County, I would like to attend but am unable to do so this time.
We have property off West Rifle Creek rd. about 6.7 from the dam.
We are very interested in protecting this beautiful area and hope to keep it for future generations. Any way Tom or I can support our state, for wildlife habitat or use for search and rescue exercises etc., please feel free to call or e-mail us.

Peggy & Tom Lange
0219 Big Dog Road
P.O. Box 384
Rifle, CO 81650
970-625-8012
cell 562-277-0848

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name Cary Lewis Date April 27, 2007

Mailing Address 11586 Co Rd 12W City/State/Zip Walden, CO 80480

Telephone (optional) 970-723-4511 E-Mail Address (optional) h20 west@hotmail.com

Would you like to be added to this project's mailing list to receive future project-related information? Yes X No ☐

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

X Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

Name of organization, government, group, or agency (if applicable) Lewis Ranch

The BLM wants to hear from you!

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1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

Concerning the Kremmling FO, I would like to see multiple use continue, more timber management on Owl Mountain, and the existing roads to stay open on the BLM lands that lead to our private ground. These are necessary to operate our cattle operation and to manage the rangeland correctly.

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

I would like the landscape to remain fairly unchanged in the future.

(Continue your comments on the other side.)

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3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

Keeping the landscape unchanged and the multiple use in place would ensure that the social, recreational, environmental, and economic benefits that currently exist would continue.

4) Any other issues, comments, or suggestions?

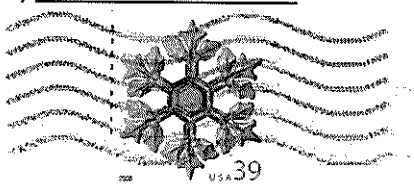
I would like to be kept informed of the mineral use or sales that involve the BLM lands in the Kremmling FO, specifically in the Deer Creek area where our graging allottment and private ground is located.

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

DENVER CO 802
27 APR 2007 PM 6 T



RECEIVED
APR 30 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name Jody Lindvall Date 5/2/2007

Mailing Address P.O. Box 1174 City/State/Zip Edwards, CO 81632

Telephone (optional) (970) 390-2695 E-Mail Address (optional) jodylindvall@hotmail.com

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☒ No ☐

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

☒ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

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

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1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

Grazing on public lands should be prohibited or reduced to a minimum.

Public lands should allow for everyone to use the land. When the land is being grazed it oftens prohibits individuals from hiking or biking. Ranchers who graze sheep often use guard dogs – who intimidate or threaten the general public.

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

Predator control should not be allowed on public lands. Hunting from a plane is not safe to the general public. Public lands should be for the public – not a select few.

(Continue your comments on the other side.)

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3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

No public lands should be sold to private entities. Keep public lands for everyone to enjoy.

4) Any other issues, comments, or suggestions?

The process for learning about rights to public land are not very well known or disseminated. Only the individuals who take advantage of grazing ~~seems~~ seem to know the correct people to contact. The current administration is not user friendly to the general public.

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

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Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007***. Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name Mary Ann Michaelis Date May 1, 2007

Mailing Address PO Box 4118 City/State/Zip Eagle, Co 81631

Telephone (optional) 970 328 1911 E-Mail Address (optional) _____

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☐ No ☐

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

☑ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

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

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1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

In regards to the BLM land in Eagle near the Bluffs subdivision, there are some serious concerns. This BLM access does not necessarily go anywhere - and the vehicular traffic in the area is causing extensive erosion and damage. This damage then causes serious drainage problems for Bluffs residents. There is no official parking - therefore the vehicles track mud through the public streets and hunters race through on their 4 wheelers.. Vehicles frequently get stuck, then causing more traffic and erosion. There really isn't a point to the vehicular access - it is altogether damaging

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

Please close (year round) to motorized vehicular traffic.

Please Review area in regards to current erosion & drainage.

(Continue your comments on the other side.)

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3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

Increased safety for ped/bike traffic.
Eliminate the booze parties & make not spots & stuck vehicles.
Adverse effects of drainage/erosion will be curtailed.
Increased public roads/neighborhood cleanliness & safety

4) Any other issues, comments, or suggestions?

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

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Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

From: BLM Form Mailer
Date: Wednesday, April 11, 2007 2:16:48 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response	
username123	
firstName	**Brent**
lastName	**Maiolo**
address	**0485 W Sopris Creek Rd Apt B**
city	**Basalt**
state	**CO**
zipCode	**81621**
phone	
email	
Mailing_List	**no**
Affiliation	**individual**
Other_Affiliation	
Question_1	**Can you please keep the Thompson Creek climbing area open.**
Question_2	**Trail system to keep erosion to a minimum.**
Question_3	**Climbing is a great recreation activity which can potentially draw limbers from around the world, thus boosting local economy.**
Question_4	
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Tuesday, May 01, 2007 2:41:17 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Cara**
lastName	**Maiolo**
address	**0485 W Sopris Crk Rd Apt B**
city	**Basalt**
state	**CO**
zipCode	**81621**
phone	
email	
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**Please keep the area open to climbing. It would be nice if after some further study the area was open to new routes and more than 9 people at a time.**
Question_2	**Adequate trails would be incorporated at minimal impact. A small trail fee if toilets were put in.**
Question_3	**The money a climbing area brings in to surrounding towns is of great significance. The climbing areas develop and create great community between various members of society.**
Question_4	**Please keep the climbing area open, climbers are very responsible, dedicated, environmental users...thanks Cara**
Submit	**Submit Comments**

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name Jean Miller Date 5/2/07

Mailing Address Box 585 City/State/Zip Tabernash CO

Telephone (optional) _____ E-Mail Address (optional) Tabernash4oc@Hotmail.com 80478

Would you like to be added to this project's mailing list to receive future project-related information? (Yes) No

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

X Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

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

The BLM wants to hear from you!

The Kremmling and Glenwood Springs Field Offices are committed to listening to and learning from our neighbors, friends, and stakeholders, each of whom belong to a *community of interest* defined by a common concern for the future of our public lands. Your answers to the following questions will be helpful at this point in the planning process, as are any other comments. Thank you for taking the time to provide your input.

1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

In all areas, restrict wheeled/motorized vehicles to specific trails/roads. Identify trails with signs, block fences, fences if possible for moving off said trails. Close such vehicles entirely in at least 1/3, preferably 1/2 to protect foot traffic. Examples: Jim Cr., Experimental Forest. Cont. Bundle Trail.

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

(Continue your comments on the other side.)

Public comments submitted, including names and street addresses of respondents, will be available for public review at the Glenwood Springs and Kremmling Field Offices during regular business hours (8:00 AM to 4:30 PM), Monday through Friday, except holidays. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be made available for public inspection in their entirety.

3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

Restricting traffic will reduce major environmental damage, inc. erosion; allow protection to animals / birds, reduce violent confrontations between motorized / non-motorized & create a more fair usage division in BLM lands; reduce possible invasion of private lands, provide some kind of protection for auditory & potential benefits so non-motorized users don't have to be hard smelled.

4) Any other issues, comments, or suggestions?

In the sand dunes area, some half or more of the area should be closed entirely to wheeled / motorized traffic to protect them from environmental damage. The remainder should be strictly patrolled for junk & fires lined.

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

Place First Class Stamp Here

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

RECEIVED
MAY - 3 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

From: BLM Form Mailer
Date: Sunday, April 29, 2007 8:27:21 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response	
username123	
firstName	**Rob**
lastName	**Morey**
address	**PO Box 6424**
city	**Snowmass Village**
state	**CO**
zipCode	**81615**
phone	**9702743217**
email	**robmorey@hotmail.com**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**In comment to the propoed new RMP for GWS and Kremmling FOs I would ask that you consider increasing sustainable recreation opportunities. More work like was done for Red Hill would be a possiblity. I would ask you to consider putting the emphasis in these area on creating mulit use trails for biking and hiking and access for 4WD and hunting on pre existing roads. Many citizens as you know are also worried about the long term impacts of oil and gas. Certain areas of our public BLM lands (North of Fruita for example) were closed to mountain bikes, but open to extracting resources. My feeling is that whether you are for or against oil and gas; nothing can run un-abated as**

	this industry has, with little oversight without having some heavy enviromnental and social impacts now and in future.
Question_2	**I would be interested in adding more signed trails in both regions. The Crown area outside of GWS is a would be a great area to do this. The proximity to towns, topography and some existing trails would make it an easy system to add to and improve. Mountain biking is my favorite activity and I know this would be something people would continue to come from all over the state for these fine cycling opportunities. I would guess that the number of users would increase steadily to about 50 a day on weekends biking and then those walking dogs etc. By providing signage and closing some routes we would be able to better manage these areas from enviromental standpoint and it would limit a spider web of OHV routes. Well signed trails with loops lead to less cattle type tracks from people getting off trail by accident and this in turn leads to lowered impact on our surroundings. In comment to oil and gas, all one has to do talk to folks in the Rifle hospital to see the social impacts. The use of meth is at very high levels, over 40% of the people that come in the emergency room are under the influence of drugs or alcohol, and we can \'t even see what happens miles from town in the wilderness. I don\'t know the statistics, but chances are if a person is using drugs while working the oil rig, they are not goig to alert someone if they create an**

	environmental disaster.
Question_3	**By providing controlled access to our public lands we can create and continue Colorado\'s reputation as a leader in outdoor recreation and tourism, as well as a responsible contributer to our energy needs.**
Question_4	**I know it is hard to please all parties and would like to say thank you for you efforts. Your efforts with the REd Hill Council were great from my understanding. I have volunteered many hours for trail construction and I would be happy to do it again in some of these areas. Thank you for your consideration.**
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Thursday, April 26, 2007 2:44:55 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Ben**
lastName	**Morgan**
address	**208 Midland Ave**
city	**Basalt**
state	**CO**
zipCode	**81621**
phone	**970-927-2194**
email	**bmorgn@comcast.net**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**I mountain bike and hike Red Hill (Mushroom Rock) throughout the year. I mainly mountain bike it and consider it my overall favorite play area in the Roaring Fork Valley. I would hate to somehow loose access to all existing trails.**
Question_2	**I believe it is managed very well right now. It gets a lot of use by hikers and bikers, but various groups constantly are cleaning and repairing the trails.**
Question_3	**I have no suggested changes, but the trails currently have all the benefits listed. I just don\'t want to loose any of these to a new management plan.**
Question_4	
Submit	**Submit Comments**

From: BLM Form Mailer
Date: Friday, April 27, 2007 1:21:27 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Steve**
lastName	**Novy**
address	**65 N. 4th St., Suite 5**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	**(970) 963-6689**
email	**novy@sopris.net**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**I would like to seee continued development and maintenance of trail systems done in conjunction with local groups like the Red Hill Council. This has been quite successful.**
Question_2	**I would like to see more trail building and more better mapping of trails for mountain biking and hiking that are close to the urban corridors, such as red Hill and The Crown near Carbondale. Also, there needs to be better education for all trail users about sensitive eco-systems and how to keep from impacting them. Motor vehicles of ALL KINDS should be RESTRICTED to specific trails that get a higher level of trail maintenance.**

Question_3	**The benfeits are having beautiful trails with respectful trail users whose uses are not in conflict with one another.**
Question_4	**The design and construction of additional thoughtful trail systems like those at Red Hill are going to help reduce the impact of additional users over the next few decades.**
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Friday, April 27, 2007 1:19:40 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Alison**
lastName	**Osius**
address	**P.O. Box 1972**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	
email	
Mailing_List	**no**
Affiliation	**individual**
Other_Affiliation	
Question_1	**I\'d like to see rock climbing permitted at Thompson Creek, near Carbondale, which is in the area of the Glenwood Springs FO.**
Question_2	**I\'d like to see groups of any size allowed in the area. While various other users frequent the area, no one else walks up the long, sandy wash atop which these routes are located. We climbers disturb no one.**

Question_3	**My husband, friends and I have so much enjoyed the climbing there, and appreciate the hard work of the first ascentionists in cleaning dirt and dust off the routes and equipping them for safety. As busy working parents with many mountain interests (lift, track and backcountry skiing; hiking, mountain biking, running), we have long wished there were good climbing somewhere less than an hour away. Thompson Creek is good rock, with a beautiful hike in, and it is reachable for a bit of after-work \"evening cragging.\" We\'d like to be able to take our children there. Climbers are good stewards. We not only clean up our trash, but anyone else \'s we ever see! Climbing has age-old roots in conservation and environmental concerns, and is historically very congruent with wilderness ethics.**
Question_4	**Climbing is a human-powered, healthy activity. It is an important and long-recognized use of resource. We appreciate the climbing at Thompson Creek so much for its quality and proximity, and the community it creates and fosters. We hope it continues to be allowed and that it is seen in an approving light. Thank you!**
Submit	**Submit Comments**
MM_insert	**form1**

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name Harold Paeglow – Coyotecreek outFitters Date 4-12-07

Mailing Address 5103 CR11 City/State/Zip Walden Co. 80480

Telephone (optional) 970-723-8666 E-Mail Address (optional) _____

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☒ No ☐

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

☒ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

Name of organization, government, group, or agency (if applicable) Coyotecreek outFitters

The BLM wants to hear from you!

The Kremmling and Glenwood Springs Field Offices are committed to listening to and learning from our neighbors, friends, and stakeholders, each of whom belong to a *community of interest* defined by a common concern for the future of our public lands. Your answers to the following questions will be helpful at this point in the planning process, as are any other comments. Thank you for taking the time to provide your input.

1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

all 4 Wheel, ATV, or Dirt Bike use in the Ironcladmountain BLM unit NEEDS to be stopped. Sometimes during hunting season you will see 15 to 20 4wheelers a day tearing up the hillsides these things also apply to the Seymoun Lake BLM area, it is a very small piece t needs no 4 Wheel access.

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

all Trails going across BLM needs to be signed Foot Bike or horse Travel only. When these areas are wet damage is very extreme to the area. This will have no impact on ranchers because they use horses anyway

(Continue your comments on the other side.)

Public comments submitted, including names and street addresses of respondents, will be available for public review at the Glenwood Springs and Kremmling Field Offices during regular business hours (8:00 AM to 4:30 PM), Monday through Friday, except holidays. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be made available for public inspection in their entirety.

3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

the changes will repair soil + Foliage, + decrease pressure during hunting season, so the Elk + Deer won't run down on adjacent ranch land where public hunters don't go. This will keep game on public land for everyone

4) Any other issues, comments, or suggestions?

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

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Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

May 2, 2007

Bureau of Land Management
Kremmling Field Office
P. O. Box 68
Kremmling, Colorado 80459
Attn: Joe Stout RMP Project Manager

RECEIVED
MAY - 2 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Troublesome Valley Ranch LLLP
P. O. Box 7
Kremmling, Colorado 80459

RE: Resource Management Plan

To Whom It May Concern:

As you begin you're scoping process of the Land Management Plan for the BLM lands it is our hope to continue livestock grazing as one of the multiple uses. Grazing is healthy for the lands with good management practices. You already have in place Standards for Public Land Health and Guidelines. We would also encourage any of BLM-administered public land that is un-allocated for livestock use, grazing use occur in the future.
Public grazing will help to keep the family owned and operated ranches in Middle Park a viable business.
With the population increase there will be greater demand and conflicts with the multiple uses of government lands. We must all do our best to preserve and protect the public lands. Grazing is beneficial to keeping the lands healthy and livestock are compatible with the wildlife. Permitees do range improvements that benefit the wildlife.
Thank you in advance for listening to our concerns about future land use.

Sincerely,

Carol J Petersen, general partner

DEC 5 - 1911

From: Stephen Rudy
Date: Friday, April 06, 2007 2:05:35 PM
Posted At: Scoping Comments 2007
Conversation: PUBLIC INPUT ON GLENWOOD/KREMMLING RMP REVISIONS
Subject: PUBLIC INPUT ON GLENWOOD/KREMMLING RMP REVISIONS

Dear Mr. Stout:

Thank you for taking a fresh look at the challenges facing BLM lands as our population continues to grow. Increased recreational pressures on our public lands to me, are simply a shift from other "public" uses such as grazing leases. We just have to balance the use of our BLM lands.

I am a multi-use user of our public lands. I hike, Mountain Bike, and drive a 4 wheel drive truck. I have a degree in environmental studies. I have a personal interest in being a steward of the land. With the Rising Sun Toyota 4x4 club, back when we sponsored/maintained the Deadman's Creek Trail, I picked up trash, shoveled, mitigated, and blocked user created routes under BLM supervision year after year after year. I enjoyed it! It really is just too far for our club to support the trail. (Most of us are Eastern Slope) None-the-Less I still find myself in the areas under review.

In my opinion the total weight footprint seems to be the biggest determination of travel impacts. The heavier the travel, the more damage it has the potential of causing. Hikers = lowest impact because they really don't carry as much stuff to throw around and footprints are pretty easy on most environments. Next up, Mt. Bikes. Again, not a lot of baggage. Maybe some "GOO" and "PowerBar" wrappers. The linear tracks resulting from riding in soft conditions can lead to increased erosion by channeling, but I've seen it. If the road/trail is THAT soft, the trail is quickly obliterated. A larger problem is riders widening mudholes by going around them. Tough call. On one hand, that puddle is someone's home and/or drinking water. On the other, the enlargement of the trail caused by going around isn't desirable either. Mitigate with proper drainage. Motorcycles, I would put next on the damage roll call. Then, 4 wheelers. This crowd seems pretty messy too. They have the machine to drag trash a long way into the back country and they leave 2 tracks! Next up, horses. Yes I think equine, bovine and other hooved animals are really tough on the environment because their PSI footprint is so high and over grazing damage to public lands is CLEARLY notable where private lands are separated by a fence from public lands. You have to do something about monitoring the SAFE carrying capacity of the land for grazing leases. The biggest potential damage comes from 4x4 trucks. 4 tons, 2 wide tracks, potential to haul in a lot of stuff that ends up as trash (TV's for lazy hunters to shoot at for example) but none-the-less, these backcountry users need a place to go too.

Trails that are already in place need to remain. Please solicit the user groups directly for help! Every 4x4 club I've been in sponsors at least 1 trail. In addition, we offer counted (and countless) hours self-policing and educating users with the

“Tread Lightly” program as well as the direct assistance of man hours of labor. Our club is even donating supplies to US forest service projects in a good faith effort to help maintain the trails we use. We don’t HAVE to do this, we CHOOSE to do this. We’re not trying to over-step government agencies, we are just a lot smaller and therefore able to react more rapidly to changing land usage patterns and problems.

The BLM’s efforts to re-asses the usage of our public lands is an indication to me that they are TRYING to keep up with the changing needs. I like that.

Trail closures: Sure, close user created routes. Please leave existing routes open. If you have to close something, provide an option. If you want to limit human intrusion into areas, create loop routes around sensitive areas. 99% of your users will stay on the trail.

And the non-4x4 side of me says open up some single-track for mountain bikes. Bikes still seem to suffer from the same “not you though” status as snowboards did for years and years on ski hills. Yet on the slopes today I see about 50% snowboarders getting along just fine with skiers. How many bike/horse or bike/hiker incidents are there on multi-use trails? Bikes are quiet, pollution free, and contribute little trash to the environment. Bikers respect the trails they do have access to. Take a look at Fruita for examples of environmental impact and mitigation of sensitive areas on or near bike trails. Fruita’s pro-bike attitude shows in the quality of the trails and you know what? I’ve NEVER encountered a horse on those trails. Hikers didn’t seem to mind stepping off for a bike to go by. Shoot. It doesn’t bother me when I have to step off for a bike or truck on a trail while I’m hiking. (2 stroke motor cycles and ATVs spitting exhaust, noise, and rocks back at me I DO have a problem with.) I know that ME stepping off in my boots causes a lot less damage than the bike or truck or ATV going off-trail to go around me.

Idea: Give the hikers a hiking trail. Give the bikers a biking trail, give the ATVrs ATV routes, and give 4x4 trucks 4x4 routes. Allow each lower impact group on the higher impact group’s trails. (Hikers can choose to hike hiking trails, biking trails, ATV trails or 4x4 roads) As long as they have choices, they can’t complain. If they don’t like the trucks, stay off the roads, if they don’t like the ATV routes, stay off those too, if they don’t like the bikes, stay off the bike trails, the hikers can still enjoy the hiking only trails.
Get each user group to help maintain “their” trail.

Any way, good luck. Keep the trails open, get volunteer help from the user base, and please do something about grazing access. Your rates are out of whack with private leases and the LAND is paying for it.

-Stephen

From: BLM Form Mailer
Date: Thursday, April 26, 2007 1:05:35 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Robert**
lastName	**Russell**
address	**156 Garfield Ave.**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	
email	**robrussell@hotmail.com**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**I am an avid user of the Red Hill Area outside Carbondale. I enjoy running, mountain biking and hiking a few times a week on those trails. I do not want to see mountain biking in this area shut down in any way. The user days are going up, but through and increase in the number of trails, access and management, I\'m sure there can be a plan that benifits all users.**
Question_2	**More trails and more access points on Red Hill. Improving the trail systems on the Crown.**

Question_3	**The recreation opportunities are a HUGE asset to living in this area. A simple thing like a bike path through a town can increase property values, provide safe and pleasant outdoor experiences for residents, and increase overall livibility of an area. This hold true for all the recreational areas in and around Carbondale. I am deeply proud of the community in which I live. A big reason for that are these outdoor recreational areas and the way in which the users treat it. Mountain bikers, trail runners, and hikers all treat each other with respect and courtesy on Red Hill. There are always exceptions, but I think this says a lot about how we all care about this area.**
Question_4	**Thank you for your efforts to improve and create trails on Red Hill - be it camping, hunting, climbing, riding, trail running, etc... Thank you also for your work with the Red Hill Council. Please put me on any mailing lists about meetings or volunteer/trail work days.**
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Thursday, May 03, 2007 12:28:59 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Matt**
lastName	**Samet**
address	**6175 Habitat Dr. #1059**
city	**Boulder**
state	**CO**
zipCode	**80301**
phone	
email	**msamet99@yahoo.com**
Mailing_List	**yes**
Affiliation	**Citizens_Group**
Other_Affiliation	
Question_1	**I would like to see the \"Hogback Mountain\" cliff at Thompson Creek opened completely, with all routes intact, to rock climbing.**
Question_2	**The designation should be scaled back from the overly prohibitive and unrealistically out-of-date classification of \"primitive\"**
Question_3	**This cliff is an enormous asset to the climbing community of the Roaring Fork Valley and of Colorado.**
Question_4	**Thanks for continuing to work with climbers!**
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Tuesday, May 01, 2007 7:34:01 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**BJ**
lastName	**Sbarra**
address	**85 Meadowood Dr**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	
email	**bj.sbarra@gmail.com**
Mailing_List	**yes**
Affiliation	**Citizens_Group**
Other_Affiliation	
Question_1	**My biggest concern is continued access to the sport climbing cliff at Thompson Creek.**
Question_2	**Currently the Thompson Creek ACEC area is managed for primitive recreation. Looking at the legal definitions, it does not fit the definitions of primitive, but rather backcountry. I would like to see the area designated as such, which would allow for more than the current limit of 9 climbers at a time. Also, I would like to see all (45) routes restored, putting the hangers that have been removed back on the bolts. The area is supposed to be managed for its recreational value and climbing is a unique recreational opportunity that takes place here.**

Question_3	**Thompson Creek is a very unique climbing resource for Carbondale and the Roaring Fork Valley. There is no other place to climb within close proximity, and it offers a unique opportunity to be challenged by a variety of great climbs in a beautiful setting. For climbers living nearby it is a great local resource, and it also acts to connect the community .**
Question_4	**I\'ve enjoyed working with the BLM as a member of the Roaring Fork Climbers Coalition on this issue and look forward to future collaborations between the two groups.**
Submit	**Submit Comments**
MM_insert	**form1**

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name Scott Schlosser Date 5/2/07

Mailing Address P.O. Box 5536 City/State/Zip Eagle CO 81631

Telephone (optional) 9703287831 E-Mail Address (optional) Scottes@vail.net

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☒ No ☐

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

☒ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

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

The BLM wants to hear from you!

The Kremmling and Glenwood Springs Field Offices are committed to listening to and learning from our neighbors, friends, and stakeholders, each of whom belong to a *community of interest* defined by a common concern for the future of our public lands. Your answers to the following questions will be helpful at this point in the planning process, as are any other comments. Thank you for taking the time to provide your input.

1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

Glenwood Springs (FO) I have two areas of Concern around the Town of Eagle. The Hardscrabble Area SW of Brushcreek above Eagle Ranch and the East Eagle area above the Bluffs New subdivision in Eagle.

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

1.) Hardscrable Area - This area's designation as open should be changed to Limited (Designated to roads + Trails) from the current Open Designation.

2.) East Eagle - This area should be closed to All Motorized Vecihles. This area is adjacent to a very dense Residential Area.

(Continue your comments on the other side.)

Public comments submitted, including names and street addresses of respondents, will be available for public review at the Glenwood Springs and Kremmling Field Offices during regular business hours (8:00 AM to 4:30 PM), Monday through Friday, except holidays. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be made available for public inspection in their entirety.

3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

1.) Hardscabble – This area will continue to have more and more use as the area's around it develope. In order to help prevent the destruction of this critical Buffer between the National Forest and BLM Lands proper Managment of this area is needed. The Open designation is no longer appropriate for this Area.

2.) East Eagle – The Single access point (OID Bellyache Rd) is a dead end and this resourse area is a vital wildlife habitat that should be protected.

4) Any other issues, comments, or suggestions?

BLM should support the seasonal closure of the East Eagle Access Rd to all Motorized vehicles to help protect the wildlife and to ensure the safty of the Recreatial hikers and bikers in that area. This area is a closed loop/Deadend that does not meet the needs of the adjacent property owners.

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

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MAY - 7 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

80459$0068 B001

HOWARD W. SCHMIDT and MYRNA E. SCHMIDT
0102 Kanoshe Court
P O Box 385
Wolcott, CO 81655
Email: hmschmidt@earthlink.net

April 28, 2007

United States Department of the Interior
Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout
P O Box 68
Kremmling, CO 80459

Via email: cormpkg@blm.gov.

Re: Glenwood Springs and Kremmling Resource Management Plans

Dear Sirs:

We are property owners and residents of the Horse Mountain Ranch Estates. We own and live at HM15 which is very close to the South Entrance to the Horse Mountain Ranch Estates. We are very concerned that the access from Highway 131 to our property is protected and access is maintained if the ownership would change hands from the BLM ownership.

We furthermore would like to see the continued usage of public lands to be the same as in the past in that we can hike and enjoy these lands as they are in close proximity of our property. We oppose the changing of these lands to other private uses that would limit the accessibility and change the usage to development that could be a change in the rural nature of the lands.

We support the position that the Horse Mountain Ranch Metropolitan District is sending to you as well. The District maintains the roads and has a concern of any changes to the surrounding lands of access to this district.

Sincerely,

Howard Schmidt and Myrna Schmidt

Rec'd 5-2-07

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name WAYNE SHOEMAKER, BAR A RANCH MNGR. Date 5-2-07

Mailing Address 2190 RCR 3 City/State/Zip TOPONAS CO 80479

Telephone (optional) 970-638-4261 E-Mail Address (optional) _____

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☑ No ☐

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

☑ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

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

The BLM wants to hear from you!

The Kremmling and Glenwood Springs Field Offices are committed to listening to and learning from our neighbors, friends, and stakeholders, each of whom belong to a *community of interest* defined by a common concern for the future of our public lands. Your answers to the following questions will be helpful at this point in the planning process, as are any other comments. Thank you for taking the time to provide your input.

1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

THE KING MOUNTAIN AREA WITHIN THE GLENWOOD FO SHOULD REMAIN CLOSED TO MOTORIZED VEHICLES. THIS IS A CALVING AREA FOR ELK AND COULD DISRUPT MIGRATORY ROUTES FOR DEER AND ELK. SAGE GROUSE NESTING AND OR LEK AREAS WOULD BE ALSO AT RISK.

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

GRAZING SHOULD BE AN INTEGRAL PART OF THE MULIPLE-USE MANAGEMENT PLAN.

LIMITED MOTORIZED VEHICLE USAGE SHOULD HAVE DESIGNATED AREAS SO ANY IMPACTS ON WILDLIFE, GRAZING LANDS, OR RIPARIAN TERRAIN WOULD BE MITIGATED.

(Continue your comments on the other side.)

Public comments submitted, including names and street addresses of respondents, will be available for public review at the Glenwood Springs and Kremmling Field Offices during regular business hours (8:00 AM to 4:30 PM), Monday through Friday, except holidays. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be made available for public inspection in their entirety.

3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

THE M"COY AREA HAS A PROVEN, OFTEN USED AND ESTABLISHED TRAIL SYSTEM FOR ATV, MOTORBIKES, MOUNTAIN BIKES, ETC. IT WOULD BE A PERFECT RECREATION AREA.

4) Any other issues, comments, or suggestions?

PERMITTEES NEED TO BE ALLOWED ACCESS PRIOR TO THE GRAZING TURN-ON DATE TO USE MOTORIZED VEHICLES FOR FENCE MAINTENANCE OR ANY IMPROVEMENTS THAT ARE NECESSARY.

A WELL MANAGED TIMBER HARVEST ON KING MOUNTAIN DURING THE WINTER MONTHS WOULD BE PRODUCTIVE. MOVE OFF AT MUD SEASON AND VERY LITTLE DAMAGE TO THE LAND WOULD OCCUR.

THE TRAIL HEADS NEED TOILETS OR PORTABLE TOILETS AND ESPECIALLY TRASH DUMPSTERS DURING VISITOR MONTHS AND HUNTING SEASON.

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

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Kremmling, CO 80459

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BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

From: BLM Form Mailer
Date: Saturday, April 07, 2007 8:39:24 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Suprena**
lastName	**Simpson**
address	**PO Box 286**
city	**Phippsburg**
state	**CO**
zipCode	**80469**
phone	
email	**csuprena@hotmail.com**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**I would like to see blm land stay as it is without further restrictions.**
Question_2	**Regulation should stay the same. Keep it so everyone can use the land.**
Question_3	
Question_4	**The blm land is already restricted enough-**
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Tuesday, April 17, 2007 7:53:27 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Suprena**
lastName	**Simpson**
address	**PO Box 286**
city	**Phippsburg**
state	**CO**
zipCode	**80469**
phone	**970-736-2512**
email	**suprenacrawford@aol.com**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**I would like to see BLM land as is with no further restrictions. thanks**
Question_2	
Question_3	
Question_4	
Submit	**Submit Comments**
MM_insert	**form1**

RECEIVED APR 16 2007

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name Eric Smith Date 4-12-07.
Mailing Address P.O. Box 623 City/State/Zip Eagle, Co 81631
Telephone (optional) 970-376-6594 E-Mail Address (optional) Smitte@Rocketmail.Com.

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☑ No ☐

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

☑ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group
☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

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

The BLM wants to hear from you!

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1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*
OVER the PAST FEW YEARS it SEEMS the COMMON MANAGEMENT TECHNIQUE USED IN REGARDS to off ROAD (ATV) TRAVEL is to CLOSE ROADS DOWN! PART of the JOB discription of BLM officials is LAW ENFORCEMENT LITTLE of this is being done!! It is EASIER to close down TRAILS. Why Can't there be STRONG CONSEQUENCES for non. CONFORMANCE of trail USE? MAKE FINES VERY Costly And it would NOT TAKE long for PEOPLE to Catch-ON that they BREAK the REGULATIONS it will Cost THEM. THE BLM is in the PROCESS of RE-WRITING the PLANS Lets LOOK AT A FINE SYSTEM INSTEAD of TRAIL CLOSURE. THE UTE CREEK AREA is the AREA AS WELL AS OTHERS IN EAGLE COUNTY that NEEDS to be LOOKED AT.

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)? SPECIFIC AREA I have CONCERNS ABOUT is the UTE CREEK DRAINAGE JUST EAST of 131 OUT of WOLCOTT. THE trail HEAD off of the DUMP ROAD has been closed & POSTED to ATV. TRAVEL. THIS has FORCED SOME to ACCESS off of the RAIL ROAD to UTE CREEK BLM trail SYSTEM. WE have DEVLOPERS closing ACCESS off to BLM trails to GET THEIR PROJECTS PASSED, WE do NOT NEED our OWN GOVERNMENT AGENCIES closing AREAS AS WELL. IS THERE ANY WAY WE CAN LOOK AT A SOLUTION of 1-TRAIL IN, 1-TRAIL-OUT for ATV. TRAVEL? THE AREA ABOVE the GOLF COURSE (EAGLE SPRINGS) is BLM LAND. THERE is PRIVATE LAND to the EAST, NORTH, AND WEST AND I-70 to the SOUTH, THAT SEEMS to be ALOT of LAND for DEER & ELK HABITAT, SO DO WE NEED to ELIMINATE

(Continue your comments on the other side.)

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ACCESS FOR ATV TRAVEL during HUNTING SEASON? THE RANCHER to the NORTH GUIDES AND BRING his HUNTERS OVER to BLM LAND ON BLM ROADS, Will he be able to USE BLM ROADS if LOWER ROADS ARE CLOSED? THAT SEEMS LIKE BLM CATERS to PRIVATE LAND OWNERS NOT the GENERAL PUBLIC. THE UTE CREEK AREA HAS LITTLE YEAR AROUND USE

(SEE ATTACHED NEXT PAGE)

3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.? I think we have seen a decrease of hunters in the Eagle & Gypsum area over the past few years. I think the road closures to ATV use has contributed to the decline. Our smaller communities rely on income from, gas, food, motels, ect from hunters. The road closures in the area has had a financial impact. The Ute Creek area is one of several areas that has been closed. Some areas that have been managed Bellyache area, Red Hill area ect have seemed to work pretty well. I would hope we can continue to manage & enforce instead of closing off our trail systems.

4) Any other issues, comments, or suggestions? So why is there a need to consider closure of this area.? I would hope a useable solution for ATV travel can be found. A trail off the Dump Road to BLM Roads to the East that ends at a trail head above Eagle Springs Golf Course on BLM Road System could be the answer. One Road in, One Road out. with limited wheel base size if needed. It seems it would be easier for BLM, DOW, Forest Service to patrol and use a ~~severe~~ severe fine system so people will respect the land use and control violators. I would like to thank the BLM for these meetings and thank Brian Hobkins for his time on Monday 4-16-07 in Gypsum.

Thanks again

Eric Smith (Smitty)

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

GLENWOOD SPRINGS CO 81601 PM 13 APR 2007

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

80459 80068 8001

From: BLM Form Mailer
Date: Monday, April 30, 2007 6:51:22 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Steve**
lastName	**Smith**
address	**1130 Vitos Way**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	
email	
Affiliation	**individual**
Other_Affiliation	
Question_1	**I would like for climbers to continue to have access to the Thompson Creek area.**
Question_2	**I would like to see the hangers restored to all the current routes and that the limitation on visitors is increased to 15.**
Question_3	**There are a large number of climbers in this valley and this area is an excellent location for us to go and climb when we have a limited amount of time and can \'t drive elsewhere, therefore it is a valuble recreation resource.**
Question_4	
Submit	**Submit Comments**
MM_insert	**form1**

From: Richard Spotts
Date: Thursday, April 05, 2007 8:29:49 PM
Posted At: Scoping Comments 2007
Conversation: My scoping comments on Glenwood/Kremmling RMP revision
Subject: My scoping comments on Glenwood/Kremmling RMP revision

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April 5, 2007

Joe Stout
RMP Project Manager
Kremmling Field Office
U.S.Bureau of Land Management
PO Box 68
Kremmling, CO 80459

RE: My scoping comments on Glenwood/Kremmling RMP revision

Dear Mr. Stout:

Please accept this letter on the above-referenced matter. My comments primarily relate to the need to improve management of transportation and motorized recreation as crucial components of RMP revision.

At the outset, I have hiked and camped on federal lands throughout much of the United States. I have a deep interest in the proper management and protection of these lands and their resource values. I am not against motorized recreation per se, and I have enjoyed riding off-road vehicles (ORVs)on dirt roads and trails. However, I have personally witnessed many instances where motorized recreation caused serious resource damage or user conflicts. I also believe that federal agencies have been too deferential to motorized recreational interests, and that more balanced and cautious management is appropriate and necessary. As such, I recommend and request that you support and implement limits on motorized recreation to prevent further resource damage or user conflicts.

My greatest overall concern relates to the rapid expansion of noxious and invasive weeds. Much of the colonization and spread of these weeds is correlated with motorized recreational uses. In some cases, these weeds have already dramatically altered fine fuel loading and fire return intervals, and these serious problems pose enormous adverse impacts on watersheds, native ecological systems and species, normal hydrologic run-off patterns, and most other resources and uses.

My specific comments are as follows:

1) I strongly support prohibitions on cross-country ORV use, game retrieval ORV use (wheeled game carriers are much more appropriate in non-wilderness areas), and ORV use for shed antler harvest. These prohibitions are all urgently necessary and reasonable. To implement these prohibitions, there must be a clear policy that only routes signed and mapped as open for motorized use may be used as such by the public. All other routes are closed, and, from an enforcement standpoint, anyone riding an ORV on an unsigned route should be in violation and cited by a ranger. In addition, there should be clear signs explaining this policy at all key entry points into major blocks of federal lands.

2) Any proposed administrative ORV uses off of designated open or administrative limited routes (cross-country) should be very specific and have compelling justification (such as firefighting, law enforcement, and search and rescue). Most such administrative uses should be limited to government employees. If a permit is issued that allows such use by non-government employees, it should have a comparable justification and such use should be carefully monitored. However, I strongly oppose allowing livestock grazing permittees to use ORVs for cross-country uses under an administrative use exemption. Traditionally, ranchers have used horses to scout, round up, and move livestock on and off of different pastures. They should continue to do so. While repeated horse use may create narrow trails, using ORVs would create much more harmful and obvious routes that may be attractive for use by other ORV riders. Of course, if ORV use is needed on a limited basis to maintain fence lines or range improvements, then point-to-point ORV use may be permissible if carefully monitored.

3) I recommend that all ORVs brought onto your federal lands from other areas for use be power washed before such use to remove any invasive or noxious weed seeds or biomass that may be attached to those ORVs. Also, if ORVs are used in areas of known invasive or noxious weed infestations, they should be power washed before they are moved for use in non-infested areas. This power washing requirement should apply to both public and administrative ORV users. There should be signs about power washing at key entry points. Firefighters should also be educated that their use of unwashed ORVs may add to the spread of invasive or noxious weeds that, in turn, may make future firefighting efforts more dangerous and difficult. In addition, power washing should be a stipulation on all permits or other use authorizations that may involve use of ORVs. Similarly, any permit or use authorization involving bringing pack or other hooved animals onto your

federal lands should require that the animals only be fed certified weed-free hay for three days prior to their arrival.

4) I recommend that the process of identifying and designated camp sites along authorized routes be expedited as much as possible. I am concerned that allowing dispersed motorized use for camping on both sides of routes will encourage further route proliferation (especially short spur routes) and related impacts, including weed expansion. In addition, allowing such dispersed ORV use for camping may violate Section 106 of the National Historic Preservation Act because ground disturbing activity would occur without the federal agency's ability to first inventory those locations for the presence of potentially significant cultural resources. As more and more spur routes are created, it becomes virtually impossible to properly inventory their locations and designate them, and it adds to law enforcement problems in terms of checking them for garbage dumps, target shooting ranges, etc. By rapidly designating a reasonable system of specific camping areas, these problems could be minimized.

5) I recommend that, where possible, route inventory tables distinguish among routes that were: (a) previously authorized for motorized use, or (b) unauthorized routes existing for many years that appear to serve one or more appropriate specific use purposes, or (c) unauthorized user-created routes that only serve the purpose of recreational sightseeing with no non-recreational destination or purpose. The reason for these distinctions is to determine which inventoried routes are or arguable should have been administratively designated for future use, versus those more recent user-created routes that were established for only general recreation. While the first two categories of routes may be appropriate for future use, I am concerned that authorizing future use on the last category may overtly reward illegal behavior and provide an incentive for some ORV riders to ignore the designations and simply create new routes wherever they wish. Illegal route proliferation is an increasing problem, and there should be strict enforcement to stop it. In my experience, many spur routes of relatively short distances may fit into this last category. While these routes may be short, many need to be closed off to discourage further expansion of these routes, or to reduce the chances that the end of these routes will become areas of unauthorized dumping, shooting, or partying.

6) I recommend that the NEPA analysis describe and analyze a reasonable range of route designation alternatives. These alternatives should include a "green" one where the presumption is that routes should be closed unless there is a strong user need to keep them open and those have little or no anticipated impacts or user conflicts, and a "brown" one where routes should be open even with low user need

unless there is a strong case of a specific resource impact or user conflict. The alternatives should describe routes both by mileage and by the density of routes per square mile. The NEPA analysis should provide the best available scientific information on how different levels of road densities per square mile affect native species, hydrology, invasive or noxous weeds, and road maintenance costs. Where native species exist that are sensitive to road density, one or more alternatives should propose densities that are below the level of disturbance or harm for those species.

7) As invasive and noxious weeds expand and alter fire and runoff patterns, these changes will affect the costs in maintaining routes. Increased soil erosion may require more frequent route blading or crown restoration, and culverts may more frequently fill with sediment. To the extent that these increased costs can be predicted or modelled in different areas, this data should be included in the route designation alternatives.

8) I recommend that proposed implementation of route signage and closure work be prioritized based on the relative urgency of resource or user problems and related costs. This is necessary to make the best "triage" use of limited staff and funds. I also recommend that special attention be paid to where routes cross utility corridors (now or in the future) and sandy washes. These are places where ORV riders often take off to explore. As they do so, they may travel some distance along the utility corridor or sandy wash before they leave it and create new unauthorized routes in more remote areas. As such, effective blockage should be considered at these key locations to prevent ORV access.

9) When temporary routes are created as part of a use authorization (logging, laying optical cable, etc.), they must be effectively removed when that use has ended. There is a sad history where federal agencies have promised in environmental documentation that such temporary roads or routes would be removed upon completion of the use, but there was not effective monitoring and many of these routes remained open for subsequent public use. I recommend that use authorizations include clear stipulations on temporary route removal, that the federal agency adequately monitor and enforce these stipulations, and that performance bonds be required if there is a risk that a permittee may leave before effectively closing the route. The taxpayers at large should not have to pay to close temporary routes created for commercial purposes.

10) Given the growing concerns about global warming as well as obesity, a greater emphasis should be placed on creating non-motorized trails for hiking and equestrian use. In some cases, it may be appropriate to close an existing route for

ORV uses (with appropriate blockage) while allowing continued non-motorized use. Indeed, these situations should be maximized first, before any new non-motorized trails are constructed.

I hope that these comments are helpful.

Thank you very much for your consideration.

Sincerely,

Richard Spotts
1125 W. Emerald Drive
St. George UT 84770-6026
spotts@infowest.com

From: George M. Straw
Date: Tuesday, April 10, 2007 9:59:54 AM
Posted At: Scoping Comments 2007
Conversation: BLM Comments
Subject: BLM Comments

From George Straw: my partners and I own a small ranch in Morrison Creek over Lynx Pass - our view is the critical component of recreation issues is restricting ATV's to very limited and existing roads/trails - these machines can and will (with their owners) go almost anywhere a horse can go and the noise and racket absolutely destroys any enjoyment of hiking in the forest and disturbs wildlife far from the established roads. If they want recreation, then need to learn to walk or ride a horse. "Noise" is not an asset but a debtriment. As a sidenote to this comment, I spend a lot of time hunting in Africa and am constantly amazed at what the natives hear that I don't. The answer is they have not been raised with this unending background noise Americans are subjected to and hear vastly lower levels of sound then our deafened ears can pick up. Thanks, George Straw

From: BLM Form Mailer
Date: Tuesday, May 01, 2007 4:15:45 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Robert**
lastName	**Stumpus**
address	**0614 Escalante Road**
city	**Carbondale**
state	**Colorado**
zipCode	**81623**
phone	**970-928-8610**
email	**rstumpus@comcast.net**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**I want to thank you for the work BLM has done in the Crown area as well as Red Mountain, be it for hiking, mountain biking camping and general outdoor use. I personally would like to promote increased areas mounain bikers can use.**
Question_2	**I aften consider my self as a mountain biker concierge. I am very villigent in making sure that all users view mountain biking as another way to enjoy the outdoors with out taking away the rights of other users.**
Question_3	**with the percentage of overweight people in this country, I feel that making a trail system that encourages multi users, to take advantage of this beautiful area we call home.**

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name Bill Thompson Date 4/11/07

Mailing Address Box 826 / Kremmling City/State/Zip

Telephone (optional) 970-724-3853 E-Mail Address (optional)

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☒ No ☐

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

☐ Individual (no affiliation) ☒ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

Name of organization, government, group, or agency (if applicable) Middle Park Stockgrowers

The BLM wants to hear from you!

The Kremmling and Glenwood Springs Field Offices are committed to listening to and learning from our neighbors, friends, and stakeholders, each of whom belong to a *community of interest* defined by a common concern for the future of our public lands. Your answers to the following questions will be helpful at this point in the planning process, as are any other comments. Thank you for taking the time to provide your input.

1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

I would like to see a moratorium on Land trades for 10 years. The trades that have gone through have created many problems for private neighbors.
The Blue Valley Land exchange should allow Thompson to graze the land acquired for 2 mos in summer.

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

1 Shut off motorized use on BLM lands North of Kremmling
2. Keep cattle grazing a multiple use concern on all BLM lands
3. Please respond to Blue Valley Land exchange and all concerns on Sec 36 Thompson.

(Continue your comments on the other side.)

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3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

I realize that consolidating land is good for BLM but the Native ranchers have gotten along for years with BLM inside their property lines. The new millionaires that move here seem to get more done with BLM simply because they have more money to acquire and trade lands.

4) Any other issues, comments, or suggestions?

(1 mile S of Kremmling) Thompson The BLM Duck unlimited property should be hayed and grazed so that the custom and culture of the valley can be preserved. Fall grazing to the original tenant (Thompson heirs) should be allowed for 1 month in fall. The elk and ducks are not good because they cause car wrecks - Force them down too soon in winter No hunting in January is bad.

Need to keep up all water tanks and help keep cattle from riparian areas.

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

Place First Class Stamp Here

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

From: BLM Form Mailer
Date: Thursday, April 26, 2007 12:30:30 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response	
username123	
firstName	**George**
lastName	**Trantow**
address	**320 Sopris Circle**
city	**Basalt**
state	**colorado**
zipCode	**81621**
phone	**970-618-4498**
email	**gtrantow@aol.com**
Mailing_List	**yes**
Affiliation	**Citizens_Group**
Other_Affiliation	
Question_1	**1. Limited access to BLM lands due to private land blocking easy access and limited trailheads at public access points. Ex. No access to Crown area from Rock Bottom Ranch despite Rio Grande Trail completion in this area. 2. Need for more designated mountain biking trails. Ex. Red Hill (Mushroom Rock) and Prince Creek are very very popular and appreciated by the biking and hiking community. We need more of these.**
Question_2	**1. More soft trails near population centers. 2. More BLM lands promoted for mountain bike use.**
Question_3	**1. Recreation opportunities. 2. Appreciation for nature and environment.**

Question_4	**1. Stop the NIMBYS from derailing community benefits.**
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Monday, April 30, 2007 11:22:21 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Chris**
lastName	**VanValkenburg**
address	**12353 st .hwy. 14**
city	**Coalmont**
state	**Co**
zipCode	**80430**
phone	
email	
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**kremmling field office**
Question_2	**limited use of heavey 4- wheel drives on open ground and unmaintaind roads.**
Question_3	**i wish not to limeted or restick any recreation for the communitys econimics.**
Question_4	**I would have great consurns and objection to your roadless and restricted travel on BLM land .If it stop the use of equiment by leaseas to maintain fences ,ditches and just for your property. Salt and minreal in key locations it insist it will apply to all leaseas of the BLM including agricalture, mining,gas and oil ,and all agents of the blm.**
Submit	**Submit Comments**

USDI, Bureau of Land Management – Kremmling and Glenwood Springs Field Offices
Resource Management Plan

We encourage you to provide your comments by filling out and submitting this comment form ***by May 2, 2007.*** Please fax your completed form to (970) 724-9590 or mail it to the address on the opposite side.

Your Name DENNIS VEIZON Date 4/25/07

Mailing Address P.O. Box 32 City/State/Zip FRASER, CO 80442-0032

Telephone (optional) (303) 819-4390 E-Mail Address (optional) _____

Would you like to be added to this project's mailing list to receive future project-related information? Yes ☒ No ☐

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

☒ Individual (no affiliation) ☐ Private Organization ☐ Citizen's Group

☐ Federal, State, or Local Government ☐ Elected Representative ☐ Regulatory Agency

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

The BLM wants to hear from you!

The Kremmling and Glenwood Springs Field Offices are committed to listening to and learning from our neighbors, friends, and stakeholders, each of whom belong to a *community of interest* defined by a common concern for the future of our public lands. Your answers to the following questions will be helpful at this point in the planning process, as are any other comments. Thank you for taking the time to provide your input.

1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)*

Not enough public fishing opportunities on our rivers and streams

1. Making existing BLM access "catch and release"
2. Trading for additional access
3. Getting access to existing properties: just outside Granby, at the mouth of the Fraser River Canyon. There is BLM land on the river with no public access - except to pay the golf course - and they limit access.

2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?

No physical changes would be necessary.

(Continue your comments on the other side.)

Public comments submitted, including names and street addresses of respondents, will be available for public review at the Glenwood Springs and Kremmling Field Offices during regular business hours (8:00 AM to 4:30 PM), Monday through Friday, except holidays. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be made available for public inspection in their entirety.

3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?

Increased recreation use of our rivers & streams. Economical benefit through more public use. More access equals a better quality of recreation, especially with the increased development on the front range and in Grand County.

4) Any other issues, comments, or suggestions?

Feel free to attach additional information.

(Please tri-fold this sheet & tape shut before mailing – Do not staple)

BLM
PO Box 68
Kremmling, CO 80459

DENVER CO 802

25 APR 2007 PM 9 T

RECEIVED
APR 26 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

From: BLM Form Mailer
Date: Friday, April 27, 2007 8:29:28 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Joseph**
lastName	**Villacci**
address	**PO Box 1851**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	
email	**polyachi@hotmail.com**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	
Question_1	**I believe Thompson Creek Climbing Area should stay open if climbers show respect to this area as our group has for other climbing areas in the roaring fork.**
Question_2	**The changes in the landscape would be limited to foot traffic. If erosion became an issue, perhaps check steps. Which, I am sure a volunteer group of climbers would be available.**

Question_3	**The Thompson Creek climbing area has increased a sense of community among local climbers. This group of local climbers has a great respect for this area and will certainly care for it if access is permited. Thompson Creek climbing area is one of the only ways some climbers can enjoy the sport during the work week. I work very hard in this valley to make a living because of the great access to beutiful public lands. I hope my access to one of my favorite parts of our land is not denied.**
Question_4	**Thank you for your time.**
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Wednesday, April 25, 2007 10:52:57 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Richard**
lastName	**Wahl**
address	**2575 Briarwood Drive**
city	**Boulder**
state	**CO**
zipCode	**80305**
phone	**303-499-8638**
email	**richard.wahl@yahoo.com**
Mailing_List	**yes**
Affiliation	**Citizens_Group**
Other_Affiliation	
Question_1	**Prevent unauthorized motorized entry onto non-motorized trails from existing roadways - such as FS 104 and 107 and from private lands (e.g., Matheson Reservoir)**
Question_2	**Better enforcement and maintainance of nonmotorized use signs - sometimes removed illegally by trespassing motorized users. Clean up mound of garbage from informal hunter camp south of E. Sheep Mth (E of ridge that is E. of FS 107). One likely source is from inholding bordering BLM lands, Matheson Reservoir, and FS lands.**

Question_3	**FS plan for FS part of Troublesome emphasizes outstanding opportunities for solitude. The BLM part of Troublesome should complement these goals**
Question_4	**Friends of the Troublesome has participated in public planning activities within both the BLM and FS areas of Troublesome drainages. As of 2007, incorporated as a nonprofit. Support maintaining existing uses in area and preventing any additional motorized or logging incursions, especially illegal motorbike and/or ATV use.**
Submit	**Submit Comments**
MM_insert	**form1**

From: Joe_Stout@blm.gov
Date: Wednesday, May 09, 2007 9:56:56 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling RA RMP Comments
Subject: Fw: Kremmling RA RMP Comments

----- Forwarded by Joe Stout/KRFO/CO/BLM/DOI on 05/09/2007 09:56 AM -----

Dennis Gale/KRFO/CO/BLM/DOI
05/02/2007 09:45 AM

To
"Linda and Art Wilson" <awilson@coloradoweblink.com>
cc
Joe Stout/KRFO/CO/BLM/DOI@BLM, Peter McFadden/KRFO/CO/BLM/DOI@BLM, John Ruhs/EYFO/NV/BLM/DOI@BLM
Subject
Re: Kremmling RA RMP Comments (Document link: Joe Stout)

Thank you for your comments. Your views and "flights of fancy" are important to us and will be helpful in the RMP efforts. Also appreciate the kind words about the Wolford Plan. Good to hear that you are enjoying this unique resource!

Dennis H. Gale
Assistant Field Manager
dennis_gale@blm.gov
(970) 724-3005

"Linda and Art Wilson" <awilson@colorado

To

weblink.com> <Dennis_Gale@co.blm.gov>
cc
05/02/2007 09:31
AM Subject
Kremmling RA RMP Comments

LINDA S. WILSON
P O BOX 580/41 CR 5211
TABERNASH CO 80478
970-887-2283

May 2, 2007

Dennis Gale, Joe Stout, RMP Planning Team
BLM Kremmling Field Office
P O Box 68
Kremmling CO 80459

Dear Planning Team Members:

Firstly, I would like to say thank you for the travel plan you created for the Wolford Mountain area. My family and I enjoy the hike to the summit of Wolford Mountain several times each summer.

I am also very interested in the Kremmling Resource Area RMP and appreciate the direction you are going with this plan. A few of my particular concerns for this area are:

the prospect of oil, gas, and other mineral development, and logging
disruption of wildlife habitat concerns me
any access roads built for these purposes should be
restored
unauthorized motorized trails should be closed
keep the area as natural as possible (making it a "destination area"
for motorized travel would definitely have

adverse impacts)
wildlife winter range and migration corridors should be protected

If you will excuse a bit of "flight of fancy," when I look at the area around Kremmling, I almost expect John Wayne or Joel McCrea to come riding down off the cliffs and into the sagebrush. This is one area which can truly give people a sense of the "old west." How wonderful that you have the opportunity to preserve and protect this valuable resource.

Thank you for the opportunity to express my views on this important matter.

Sincerely,

Linda Wilson

From: BLM Form Mailer
Date: Monday, April 23, 2007 7:21:12 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response	
username123	
firstName	**James**
lastName	**Wolf**
address	**3704 N. Charles St. (#601)**
city	**Baltimore**
state	**MD**
zipCode	**21218**
phone	**4102359610**
email	**cdtsociety@yahoo.org**
Mailing_List	**yes**
Affiliation	**Citizens_Group**
Other_Affiliation	
Question_1	**Off-highway routing of Continental Divide National Scenic Trail in the Muddy Pass area.**
Question_2	
Question_3	
Question_4	
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Wednesday, April 11, 2007 8:39:52 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**David**
lastName	**Wynn**
address	**PO Box 3120**
city	**Sunriver**
state	**OR 97707**
zipCode	**97707**
phone	
email	
Mailing_List	**no**
Affiliation	**individual**
Other_Affiliation	
Question_1	**I do not want to see any more drilling, mining or development of any kind on these public lands.**
Question_2	**If I had it my way, I would like to dismantle all of the development, drilling and mining operations currently in place and return the land to its natural state. This would benefit wildlife, which have already been stressed by developments. Small groups of people(less then 5) should be allowed on to these lands as long as they practice leave no trace ethics.**

Question_3	**Education, eco-tourism, light impact hiking and camping; these are all beneficial activities that help sustain the health of these lands. Of course, they also add substantial dollars to the local economy.**
Question_4	
Submit	**Submit Comments**
MM_insert	**form1**

From: BLM Form Mailer
Date: Friday, April 27, 2007 4:15:10 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Len**
lastName	**Zanni**
address	**0176 Deer Trail Avenue**
city	**Carbondale**
state	**CO**
zipCode	**81623**
phone	**970-963-2045**
email	**lenzanni@comcast.net**
Mailing_List	**yes**
Affiliation	**individual**
Other_Affiliation	**Aspen Cycling Club member, IMBA member**
Question_1	**I would like to thank you for your current and future efforts to improve and increase the mountain bike and multi-use trail opportunities on BLM lands within your district. I am an avid cyclist, professional category mountain bike racer, Colorado business owner and father of two. As you work on this RMP I highly encourage you to take the considerations of mountain bikers into consideration. Specifically, areas such as Red Hill and the Crown are of high interest to me. A good portion of my annual recreation takes place on these and other BLM lands to the west. You have the opportunity to retain these lands as quality mountain bike riding**

	areas while addressing the interests of the land and other user groups. Please work with organizations such as the Aspen Cycling Club and International Mountain Bike Association (I am a member of both) so that their voices may be heard.
Question_2	I would encourage you to improve and increase the number of trails that are legally available to the mountain bike community. Your efforts working with the Red Hill Council are remarkable and you have helped create a high quality area for riding, trail running, hiking, dog walking and more. If you feel the need to work with other groups like this in other areas please contact me. I believe a similar group could be created for the Crown trails area to help with trail maintenance, behavior observation and coordination. Multi-use trails with few restrictions on user limits, group size, behavior should be encouraged until there are true management or user conflict issues to address.
Question_3	The benefits of improved and increased recreation opportunities for mountain bikers and other trail users in this area are numerous. More people recreating on more trails in the Roaring Fork Valley will increase the economic growth of the area, disperse users across a greater area to reduce user conflicts and enhance the user experience overall. Of course, any improvements or new trails should be undertaken utilizing the latest in erosion resistant trail building techniques.

Question_4	**Mountain biking is a way of life for many of us on the Western Slope and I encourage you to keep this in mind when working on the RMP. My children are young but I can't wait for the day that I can share some of our local trails, including the amazing trails of the Red Hill, Crown and other areas on BLM lands, with them. Communication between users groups is paramount to creation of a successful plan and I trust that you will take comments into consideration. With use on BLM so diverse, mountain bikers, motorcyclists, hikers, dog walkers, hunters, grazing cattle, mineral and gas extraction, it's time to create a forward looking plan that makes concessions for all users. Please contact me to discuss these issues if you like. Len Zanni**
Submit	**Submit Comments**
MM_insert	**form1**

Law Firms

BJORK • LINDLEY • LITTLE • PC

LAWYERS

PETER A. BJORK†
LAURA LINDLEY
DAVID R. LITTLE
ROBERT C. MATHES†*
DARIN B. SCHEER†
KATHLEEN S. CORR
JILL D. CANTWAY†
KELLY A. REES†
CHRISTOPHER G. HAYES*
ANN M. EASTBURN†

*Of Counsel
*Special Counsel
†Also admitted in Wyoming
*Also admitted in the District of Columbia

RECEIVED
MAY - 2 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

April 30, 2007

Joe Stout, RMP Project Manager
Bureau of Land Management
Kremmling Field Office
P.O. Box 68
Kremmling, Colorado 80459

Re: Notice of Intent to Prepare Resource Management Plans for the Kremmling and Glenwood Springs Field Offices and Associated Environmental Impact Statement, Colorado

Dear Mr. Stout:

We represent a number of oil and gas producers which explore and operate on the public lands in Colorado and submit these scoping comments regarding the Resource Management Plan for the Kremmling and Glenwood Springs Field Offices and the associated Environmental Impact Statement. We would like to thank the Bureau of Land Management for the opportunity to submit scoping comments regarding this project.

The planning area is located in several different counties in Colorado and contains 964,000 acres of BLM-administered public lands. With continued geopolitical instability, the need for reliable, domestic sources of clean burning fuel continues to grow. Areas within the Piceance Basin, one of the nation's largest oil and gas reserves, as well as areas within the North Park Basin, must be utilized to their full extent for energy development. As gas produced from traditional supply sources decline, the untapped oil and gas potential in the areas of the Glenwood Springs and Kremmling Field Offices, as well as other federal lands, must take a larger role in meeting the nation's continually increasing energy needs. We encourage the BLM to impose only reasonable restrictions on oil and gas leasing and development, as required by Section 363 of the Energy Policy Act of 2005, 42 U.S.C. § 6323 (2006).

1600 STOUT STREET • SUITE 1400 • DENVER, COLORADO 80202-3110
TELEPHONE: 303-892-1400 • FACSIMILE: 303-892-1401 • www.bjorklindley.com

Please place our office on the mailing list for all future information regarding the Notice of Intent to Prepare a Resource Management Plan Revision and associated Environmental Impact Statement for the Glenwood Springs and Kremmling Field Offices.

Very truly yours,

BJORK LINDLEY LITTLE PC

Kathleen S. Corr

Kathleen S. Corr

McDermott
Will & Emery

Boston Brussels Chicago Düsseldorf London Los Angeles Miami Munich
New York Orange County Rome San Diego Silicon Valley Washington, D.C.
Strategic alliance with MWE China Law Offices (Shanghai)

Shirley S. Fujimoto
Attorney at Law
sfujimoto@mwe.com
202.756.8282

May 1, 2007

RECEIVED
MAY - 4 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

VIA FACSIMILE AND U.S. MAIL

Joe Stout
RMP Project Manager
Kremmling Field Office
Bureau of Land Management
PO Box 68
Kremmling, CO 80459

Re: Union Telephone Company, Inc.; Comments on Resource Management Plans and Asociated Environmental Impact Statement for Kremmling and Glenwood Springs Field Offices, CO-120-1610-DO-022C

Dear Mr. Stout:

Enclosed for filing with the Bureau of Land Management, please find the Comments of Union Telephone Company in response to the "Notice of Intent to Prepare Resource Management Plans for the Kremmling and Glenwood Springs Field Office and Associated Environmental Impact Statement, Colorado."

Also, enclosed for filing please find a CD-ROM containing an electronic copy of Union's Comments and supporting exhibits in PDF format.

In addition, we request that you please date-stamp the additional copy provided and return it in the attached envelope.

Thank you for your assistance in this matter.

Very truly yours,

Shirley S. Fujimoto

Attorney for Union Telephone Company

Enclosures

RECEIVED
MAY - 4 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

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

In the Matter of	)	
	)	
Notice of Intent to Prepare Resource Management Plans for the Kremmling and Glenwood Springs Field Office and Associated Environmental Impact Statement, Colorado	)	**CO-120-1610-DO-022C**

To: The Kremmling and Glenwood Springs Field Offices

COMMENTS OF UNION TELEPHONE COMPANY

Union Telephone Company ("Union"), through its undersigned counsel, respectfully submits these Comments in response to the *Notice of Intent* in the above-captioned matter,[1] pursuant to section 1610.2 of the Bureau of Land Management's ("BLM") rules.[2] In this *Notice of Intent*, the BLM proposed to prepare revised Resource Management Plans ("RMPs") and an associated Environmental Impact Statement ("EIS") for the Kremmling and Glenwood Springs Resource Areas. Although the Kremmling and Glenwood Springs Field Offices will adopt separate RMPs for their respective Resource Areas, they will prepare a single EIS.[3]

Union commends the BLM for its efforts to update the RMPs for the Kremmling and Glenwood Springs Resource Areas. Although the BLM has incorporated piecemeal amendments to these RMPs since their adoption in 1984, the BLM should revisit the RMPs to ensure that they reflect the nation's evolving priorities and the greater importance of wireless communications in

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[1] Notice of Intent to Prepare Resource Management Plans for the Kremmling and Glenwood Springs Field Office and Associated Environmental Impact Statement, Colorado, 72 Fed. Reg. 9584 (Mar. 2, 2007) ("*Notice of Intent*").

[2] 43 C.F.R. § 1610.2 (2006); *see* 43 U.S.C. § 1712(f) (1986).

[3] *Notice of Intent*, 72 Fed. Reg. at 9585.

modern life.[4] In particular, Union urges the BLM to revise the RMPs to facilitate the availability of federal lands for the construction and use of wireless communications infrastructure. While Union recognizes that the BLM must balance the management of various land uses, it recommends that the BLM designate additional utility corridors for the siting of wireless communications infrastructure and continue to follow a flexible approach to the siting of such infrastructure in areas outside of utility corridors.

The BLM should enhance the availability of federal lands for wireless communications infrastructure because it would satisfy numerous federal laws and policies. Specifically, the revised RMPs should comply with the executive and legislative directives supporting the construction and use of wireless communications infrastructure on federal lands. The siting of communications towers on federal lands would also further federal policies concerning the enhancement of public safety and emergency communications and the expansion of telecommunications services to rural areas. Finally, the siting of wireless communications infrastructure is otherwise consistent with the BLM's management priorities under the Federal Land Policy and Management Act of 1976 ("FLPMA") and the National Environmental Policy Act of 1969 ("NEPA").

I. BACKGROUND

Union was founded in 1914 and has a long-standing history of providing vital telecommunications services in underserved rural areas. Based in Mountain View, Wyoming, Union provides local telephone service to approximately twenty-five rural communities in parts

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[4] U.S. Department of the Interior, Bureau of Land Management, Preparation Plan for the Resource Management Plan Revisions for the Kremmling and Glenwood Springs Field Offices 9, 10 (2005), *available at* http://www.blm.gov/rmp/co/kfo-gsfo/documents/Prep-Plan-Public-Copy-2-22-06.pdf ("Decisions will also be evaluated and revised as necessary to reflect changing conditions and resource demands or protection needs.") ("*Preparation Plan*").

of Wyoming, Colorado, and Utah. In 1990, Union expanded to wireless telecommunications service and now provides, or is licensed to provide, coverage to an area encompassing over 123,611 square miles of mostly rural country. Although Union commenced operations with only eight cell sites, the demand for cellular service has caused this number to multiply to over 200 cell sites placed throughout Wyoming, northwestern Colorado, and parts of Utah. Besides basic telephone and cellular service, Union also offers long distance, Internet, and cable television service.

Union has a strong interest in the *Notice of Intent* because the Kremmling and Glenwood Springs Resource Areas are within its licensed wireless service area. As depicted on a map of Union's Global System for Mobile Communications ("GSM") home coverage area, Union already provides coverage to portions of the Kremmling Resource Area.[5] Although Union has constructed or otherwise uses several wireless communications towers in the Kremmling Resource Area,[6] it will need to construct other towers in this Resource Area in the future. Union also intends to install wireless communications sites in the Glenwood Springs Resource Area. Thus, any revision to the Kremmling and Glenwood Springs RMPs would directly impact Union's existing and proposed operations.

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[5] Union Wireless, Union Wireless GSM Home Coverage Map, *available at* http://www.unionwireless.com/pdf/GSMHomeMap.pdf (last visited Apr. 16, 2007) (attached as Exhibit 1). GSM is a state-of-the-art digital wireless communications service, which is used by AT&T/Cingular Wireless and T-Mobile, as well as Union.

[6] For example, Union constructed a communications site on BLM-managed land at Sentinal, as well as several other sites on Forest Service land in the Kremmling Resource Area. In December 2005, Union filed an application with the BLM for a wireless communications site at Owl Ridge.

II. FEDERAL LAW COMPELS BLM TO MAKE THE KREMMLING AND GLENWOOD SPRINGS RESOURCE AREAS AVAILABLE FOR THE SITING OF WIRELESS COMMUNICATIONS INFRASTRUCTURE

The BLM has received directives from the President and Congress to implement the nation's strategy for wireless communications. Over the past twelve years, the executive and legislative branches have prodded land management agencies to encourage and facilitate the siting of wireless communications infrastructure on federal property. These directives initially appeared in the mid-1990s in (1) an Executive Memorandum; (2) the Telecommunications Act of 1996; and (3) a General Services Administration Bulletin. The BLM's Washington Office subsequently issued an Instruction Memorandum providing guidance to its field offices on rights-of-way planning. President Bush also issued an Executive Memorandum reiterating the importance of expanding the deployment of telecommunications infrastructure on federal lands.

A. The Executive and Legislative Branches Encourage the Siting of Wireless Communications Infrastructure on Federal Land

On August 10, 1995, President Clinton issued an Executive Memorandum directing the BLM and other executive departments and agencies to facilitate the siting of "mobile services antennas" on federal property.[7] Specifically, the Executive Memorandum indicates that "[u]pon request, and to the extent permitted by law and where practicable, executive departments and agencies shall make available Federal Government buildings and lands for the siting of mobile service antennas."[8] The Executive Memorandum predicts that the siting of these antennas on

---

[7] Memorandum of August 10, 1995, Facilitating Access to Federal Property for the Siting of Mobile Services Antennas, 60 Fed. Reg. 42023, 42023 (Aug. 14, 1995).

[8] *Id.*

federal property would foster new technologies, stimulate economic growth, and create new jobs.[9]

In the Telecommunications Act of 1996, Congress further attempted to spur the deployment of wireless telecommunications services by directing federal agencies to support the siting of antennas on federal property. Section 704(c) requires "the President or his designee [to] prescribe procedures by which federal departments and agencies may make available . . . property, rights-of-way, and easements under their control" for the siting of wireless communications infrastructure.[10] The FCC's Wireless Telecommunications Bureau interprets this provision as requiring the federal government to help wireless licensees to "get access to *preferred* sites for their facilities."[11]

In response to the Executive Memorandum and the Telecommunications Act, the General Services Administration published a Bulletin in the Federal Register outlining the guiding principles and actions necessary for federal agencies to implement the antenna siting program.[12] The Bulletin notes that "[r]equests for the use of property, rights-of-way and easements by telecommunications service providers . . . should be granted, unless there are unavoidable conflicts with the department's or agency's mission, or current or planned use of the property or

---

[9] *Id.*

[10] Telecommunications Act of 1996, Pub. L. No. 104-104 § 704(c), 110 Stat. 56, 152 (1996) (codified at 47 U.S.C. § 332 note (2001)); H.R. Rep. No. 104-458 at 207-209 (1996) (Conf. Rep.), *as reprinted in* 1996 U.S.C.C.A.N. 124.

[11] Federal Communications Commission, Wireless Telecommunications Bureau, New National Wireless Tower Siting Policies, Fact Sheet, http://wireless.fcc.gov/siting/fact1.html (Apr. 23, 1996) (emphasis added).

[12] Placement of Commercial Antennas on Federal Property, 72 Fed. Reg. 11881 (Mar. 14, 2007). The GSA published prior versions of these policies in March 1996 and June 1997. Placement of Commercial Antennas on Federal Property, 62 Fed. Reg. 32611 (June 16, 1997); Placement of Commercial Antennas on Federal Property, 61 Fed. Reg. 14100 (Mar. 29, 1996).

access to that property."[13] Thus, the GSA's implementation guidelines call for federal departments and agencies, including the BLM, to support the siting of commercial antennas on federal property.

B. The BLM Requires Its Field Offices to Facilitate the Siting of Wireless Communications Infrastructure as Part of the Land-Use Planning Process

In 2002, the BLM issued an Instruction Memorandum regarding the incorporation of communications rights-of-way ("ROW") into the land-use planning process.[14] In this Instruction Memorandum, the BLM's Washington Office advises the field offices that "each RMP should consider a general RMP goal statement or ROW corridor decision which emphasizes that BLM will encourage use of the designated ROW corridors and ROW Use Areas *to the extent possible*."[15] Although the BLM encourages the use of designated ROW corridors, it also requires field offices to consider "site specific needs."[16]

C. President Bush Reiterated the Importance of Deploying Communications Infrastructure on Federal Lands

In 2004, President Bush elaborated on the policy of wireless infrastructure deployment in an Executive Memorandum.[17] Specifically, the Executive Memorandum declares that "a key to widespread broadband deployment is ensuring that broadband providers have timely and cost-effective access to rights-of-way so that they can build out their networks across the Nation."[18]

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[13] Placement of Commercial Antennas on Federal Property, 72 Fed. Reg. at 11883.

[14] U.S. Department of the Interior, Bureau of Land Management, Instruction Memorandum No. 2002-196, ROW Corridors, ROW Use Areas, Land Use Planning (June 25, 2002), *available at* http://www.blm.gov/nhp/efoia/wo/fy02/im2002-196.html.

[15] *Id.* (emphasis added).

[16] *Id.*

[17] Memorandum on Improving Rights-of-Way Management Across Federal Lands To Spur Greater Broadband Deployment, 40 Weekly Comp. Pres. Doc. 696, 697 (Apr. 26, 2004).

[18] *Id.*

Because these wireless networks "often need to cross large areas of land owned or controlled by the Federal Government," the Administration created a Federal Rights-of-Way Working Group to "identify and recommend changes in Federal policies, procedures, regulations, and practices that would improve the process of granting rights-of-way for broadband communications networks on lands under Federal jurisdiction."[19]

The Working Group issued a Report with its recommendations to encourage broadband deployment throughout all regions of the nation. The Working Group also sought to "improve access to rights-of-way for other interested stakeholders."[20] Although the Working Group recommended that federal agencies encourage the use of utility corridors whenever practicable, it explicitly "recognize[d] that "utility corridors may not always present the most efficient or cost-effective route for rights-of-way applicants and [that] applicants should retain the flexibility to apply for other routes."[21] The Working Group also advised federal agencies to "give special consideration to potential broadband use for extending service to rural communities."[22] In the Executive Memorandum, President Bush directs executive departments to implement the Working Group's recommendations.[23]

These recommendations will assist Union in deploying wireless broadband and other communications services to rural areas in the Kremmling and Glenwood Springs Resource

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[19] *Id.*

[20] U.S. Department of Commerce, National Telecommunications and Information Administration, Improving Rights-of-Way Management Across Federal Lands: A Roadmap for Greater Broadband Deployment, *Report by the Federal Rights-of-Way Working Group* at 2, 10 (Apr. 2004), *available at* http://www.ntia.doc.gov/reports/fedrow/FROWReport_4-23-2004.pdf.

[21] *Id.* at 25-26.

[22] *Id.* at 27.

[23] Memorandum on Improving Rights-of-Way Management across Federal Lands to Spur Greater Broadband Deployment, 40 Weekly Comp. Pres. Doc. at 697.

Areas. Although Union currently provides non-broadband data services over Enhanced Data rates for GSM Evolution ("EDGE") and General Packet Radio Service ("GPRS") technologies, it plans to upgrade to a broadband technology, High-Speed Downlink Packet Access ("HSDPA"), in the future. Union also has acquired FCC spectrum licenses for 700 MHz and Advanced Wireless Services frequencies, which authorize Union to provide broadband data services throughout its service area. In rural areas, these services will probably constitute the only cost-effective way for the public to receive broadband services, including Internet access.

III. EMERGENCY COMMUNICATIONS DEPEND ON THE SITING OF WIRELESS COMMUNICATIONS INFRASTRUCTURE ON FEDERAL LANDS

The BLM would advance the national interest in public safety, homeland security, and emergency communications by revising the Kremmling and Glenwood Springs RMPs to facilitate the siting of wireless communications infrastructure. Although the BLM already considers safety management in its decision-making process, Congress has enacted several statutes emphasizing the deployment of wireless communications infrastructure as a means of enhancing emergency communications.[24] The siting of communications towers on federal land also would respond to requests by private, governmental, and industrial users for improved

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[24] In addition to legislative action, the executive branch has launched several initiatives to develop a secure and robust infrastructure for critical utilities, including telecommunications. *E.g.*, The National Strategy for the Physical Protection of Critical Infrastructures and Key Assets at 47-49 (Feb. 2003). The National Park Service also specifically requires Park Superintendents to "consider the potential benefit of having telephone access to emergency law enforcement and public safety services" when reviewing applications for wireless telecommunications facilities. National Park Service, Management Policies 2006 § 8.6.4.3 (2006), *available at* http://www.nps.gov/policy/MP2006.pdf ("*NPS Management Policies*"); *see* National Park Service, Director's Order #53: Special Park Uses § 10.3 (2000), *available at* http://www.nps.gov/policy/DOrders/DOrder53.html ("*NPS Director's Order #53*"); National Park Service, Reference Manual to Director's Order #53 Special Park Uses at A5-46 (2000), *available at* http://www.nature.nps.gov/RefDesk/index.cfm#Executive%20Orders ("*NPS Reference Manual*").

emergency communications. Finally, recent events confirm that wireless communications are indispensable in emergency situations, especially in remote areas.

A. Federal Statutes Encourage the Deployment of Wireless Communications to Enhance Emergency Communications

The BLM should give substantial weight to public safety considerations in its preparation of the RMPs for the Kremmling and Glenwood Springs Resource Areas. Although the BLM already considers safety issues when ruling on individual right-of-way applications,[25] Congress has enacted several other statutes to encourage and facilitate the deployment of wireless communications infrastructure for public safety purposes. The BLM should incorporate the policies reflected in these statutes into the RMPs for the Kremmling and Glenwood Springs Resource Areas.

1. Communications Act of 1934

Congress has long emphasized the public safety aspects of wireless communications. Section 1 of the Communications Act of 1934 ("Communications Act") indicates that a purpose of the statute is to "make available, so far as possible, to all the people of the United States . . . a rapid, efficient, Nation-wide . . . wire and radio communication service with adequate facilities . . . *for the purpose of promoting safety of life and property through the use of wire and radio communications*."[26] To achieve this statutory purpose, wireless communications providers will need to install their infrastructure on federal lands.

2. Wireless Communications and Public Safety Act of 1999

This vital national interest was further underscored by the enactment of the Wireless Communications and Public Safety Act of 1999. The purpose of this Act is "to encourage and

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[25] 43 U.S.C. § 1763.

[26] 47 U.S.C. § 151 (2001) (emphasis added).

facilitate the prompt deployment throughout the United States of a seamless, ubiquitous, and reliable end-to-end infrastructure for communications, including wireless communications, to meet the Nation's public safety and other communications needs."[27]

In the legislative history, the House of Representatives found that the traveling public increasingly relies on wireless telephones to "provid[e] themselves with an extra measure of security."[28] The House noted that the traveling public "us[e] these phones to call for help when they need it, to report other drivers' accidents or injuries, and to report erratic or aggressive drivers to authorities before those drivers have an opportunity to injure others."[29] Although the public depends on these wireless phones, the House observed that the existing wireless infrastructure is insufficient.[30] The House found that "in many areas across the country, there are 'holes' or 'dead zones' in the wireless network where a wireless call cannot be transmitted due to the absence of a nearby cellular or personal communications services (PCS) antenna."[31] Even though the House recognized that "the siting of antennas on Federal property will not patch every hole in the wireless network," it asserted that antenna siting on federal lands "will provide coverage to areas where there are few other alternatives."[32] The BLM should facilitate additional siting of communications towers in the Kremmling and Glenwood Springs Resource Areas because these Areas lack any other feasible alternatives to satisfy this statutory mandate.

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[27] *Id.* § 615 note (b).

[28] H.R. Rep. No. 106-25, at 5 (1999); *see* S. Rep. No. 106-138, at 1 (1999) (noting that many Americans "subscribe to wireless telephone service . . . for safety reasons, especially when traveling.").

[29] H.R. Rep. No. 106-25, at 5 (1999).

[30] *Id.* at 4.

[31] *Id.*

[32] *Id.* at 6.

3. ENHANCE-911 Act

In 2003, Congress adopted the Ensuring Needed Help Arrives Near Callers Employing 911 Act of 2004 ("ENHANCE 911 Act") to provide federal funding and coordination of wireless 911 deployment.[33] Congress found that "enhanced 911 is a high national priority and it requires Federal leadership, working in cooperation with . . . numerous organizations dedicated to delivering emergency communications services."[34]

In the legislative history, the House found that "[a]n increasing number of emergency calls are placed from wireless rather than wireline telephones."[35] The House pointed to the millions of wireless customers in the United States, "many of whom witness or experience accidents when they are in reach of their wireless phones but miles from a wireline telephone."[36] The House stated that "[w]ireless phones present the opportunity to drastically reduce emergency response time and save even more lives."[37]

Union has committed to the deployment of emergency communications throughout its service area. To provide these communications, however, Union will need to construct wireless communications infrastructure. Thus, the BLM should revise the Kremmling and Glenwood Springs RMPs to encourage and facilitate the siting of this infrastructure on federal lands.

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[33] Ensuring Needed Help Arrives Near Callers Employing 911 Act of 2004, Pub. L. No. 108-494 § 102(4), 118 Stat. 3986 (codified at 47 U.S.C. § 942 note (Supp. 2006)).

[34] *Id.*

[35] H.R. Rep. No. 108-311, at 4 (2003). As of 2003, the Senate estimated that the public places more than 56 million 911 calls each year from wireless telephones. S. Rep. No. 108-130, at 2 (2003).

[36] H.R. Rep. No. 108-311, at 4 (2003).

[37] *Id.*

B. The Siting of Communications Towers on Federal Land Responds to Public Requests for Emergency Communications

The BLM would enhance public safety and emergency communications if it revised the Kremmling and Glenwood Springs RMPs to facilitate the siting of wireless communications infrastructure. Although Union offers commercial service in Wyoming, Utah, and Colorado, its subscribers expect to receive access to emergency communications as part of this service. As explained below, Union needs to construct and use wireless communications infrastructure on BLM-managed land throughout its service area, including the Kremmling and Glenwood Springs Resource Areas, to ensure the availability of such emergency communications.

Union has received many requests to enhance its system coverage. For example, wireless telephone subscribers have long complained to Union about the lack of coverage in certain parts of its service area, especially parts in and adjacent to BLM-managed lands. These subscribers consist of Union's own local customers, as well as customers of other carriers who rely on Union for roaming coverage.

In addition, Union has received requests for improved coverage from local and federal governmental and public safety agencies in its service area.[38] While these governmental agencies want residents in their jurisdictions to have access to wireless communications during emergencies, many of these agencies also have had to rely on Union's network for their own

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[38] In a separate proceeding, the Board of Fremont County (Wyoming) Commissioners stated that:

> [W]e believe the people who feel poor or non-existent cell coverage is a "minor inconvenience" compared to a possible intrusion on the scenic values have never been in a life threatening situation between Lander and Rawlins, especially along the area from Beaver Rim to Jeffrey City. It is our position that public safety takes higher priority than occasional visual enjoyment, especially in this situation.

Letter from Douglas L. Thompson, Vice-Chairman, Board of Fremont County Commissioners, to Bob Ross, Field Manager, Lander Field Office, BLM (Nov. 1, 2006).

communications in certain emergency situations. As discussed below, even the BLM, National Park Service, and Forest Service have contacted Union to request the provision of communications services during range fires and other emergencies.

Business users also have asked Union to establish a sound wireless network for emergency communications. In particular, Union provides wireless communications service to many companies that work, travel, and commute in the Kremmling and Glenwood Springs Resource Areas. These wireless subscribers include energy-related companies that rely on Union to provide service for their employees and subcontractors. Energy companies require wireless communications for access to emergency 911 services when working in remote areas and, without this service, will not commence operations.[39]

Although Union has attempted to accommodate these requests, its capacity and terrain coverage are not sufficient to provide the necessary level of emergency communications services required by subscribers. For example, Union has identified several coverage gaps along U.S. Highway 40, as well as along other smaller state and county roads in the Kremmling Resource Area. Union also seeks to extend its coverage to include the Glenwood Springs Resource Area. These dead zones raise public safety concerns regarding the lack of access to emergency communications arising from accidents, range fires, medical emergencies, and winter storm conditions. To provide the capacity and terrain coverage necessary to make emergency communications available in these and other areas, Union will need to construct wireless communications infrastructure on BLM-managed land in the Kremmling and Glenwood Springs Resource Areas.

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[39] Although energy companies use land mobile radio services, they have found that Union's wireless services are more reliable for emergency communications.

C. Wireless Communications Are Indispensable in Emergency Situations

Wireless communications often are the difference between life and death in remote areas of the United States. As discussed below, Union cooperates extensively with local and federal public safety agencies to provide critical emergency communications in rural areas. Individual subscribers also rely on Union's wireless communications service in emergency situations. Wireless communications have undeniably contributed to fire management operations and the rescue of lost or injured individuals on federal lands.

1. Union Provides Emergency Wireless Communications to Public Safety Agencies and Individuals

Union cooperates extensively with local and federal public safety agencies during emergencies. For example, at the request of the BLM and Forest Service, Union erected a wireless communications tower to provide emergency communications during the Mustang Ridge Fire, which was the most destructive of the 2002 fire season.[40] In addition, the National Park Service asked Union to provide emergency wireless facilities during a fire at Yellowstone National Park. Union also cooperates with law enforcement whenever possible, including through the provision of wireless communications service for a missing-person search in Jackson County, Colorado.

Union also provides emergency wireless communications to individual subscribers. Although Union cannot know exactly how many people have relied on its service during emergencies, it is aware of at least one instance in which its wireless coverage helped save

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[40] Susan Whitney, *Order May Have Aided Utah Fire*, Deseret (Salt Lake City) News, Apr. 4, 2003.

someone's life near Steamboat Springs, Colorado.[41] In September 2004, local and federal public safety agencies responded to a request for emergency medical assistance involving a bowhunter who had seriously injured himself by puncturing his leg with an arrow.[42] A fellow bowhunter used his wireless telephone to call the injured hunter's father who, in turn, called 911.[43] The emergency dispatcher directed the uninjured bowhunter to meet paramedics at the nearest road to expedite the rescue effort.[44] The uninjured hunter "was thankful for the cell phone he had bought just several days before the accident . . . to ensure he'd have reception in remote areas."[45]

2. Wireless Communications Provide Invaluable Assistance to Federal Agencies

Wireless communications have contributed to fire management operations and to search and rescue missions on federal lands. Although information for the Kremmling and Glenwood Springs Resource Areas are not readily available, the BLM has indicated that the Upper Colorado River fire management staff and resources rely on commercial wireless service.[46] Although the BLM also uses interagency land mobile radios, it states that "[c]ell phones should

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[41] *E.g.*, Tamera Manzanares, *Resident Injured with Arrow: 18-Year-Old Flown to Denver after Stepping on Hunting Arrow*, Steamboat Pilot & Today (Steamboat Springs, CO), Sept. 27, 2004; *see* David Mirhadi, *The Whole Town's Talking: Saved by the Cell: Cody Woman Lucky to Be Alive after Harrowing Trip*, Casper Star-Tribune, Nov. 14, 2006 (reporting that a woman placed a cell phone call to request emergency assistance after wrecking her car).

[42] *E.g.*, Tamera Manzanares, *Resident Injured with Arrow: 18-Year-Old Flown to Denver after Stepping on Hunting Arrow*, Steamboat Pilot & Today (Steamboat Springs, CO), Sept. 27, 2004.

[43] *Id.*

[44] *Id.*

[45] *Id.*

[46] U.S. Department of the Interior, Bureau of Land Management, Fire Management Plan: Wildland Fire Management & Prescriptive Vegatation Treatment Guidance 18 (2004).

be used by initial and extended attack resources for lengthy conversations regarding operational tactics, logistical needs and coordination and other matters."[47]

The National Park Service ("NPS") has frequently mentioned the importance of wireless communications to the rescue of lost or injured individuals at Grand Teton National Park over the past fourteen months. In August 2006, NPS rangers responded to at least two 911 cell phone calls requesting emergency medical assistance for life-threatening injuries.[48] In one instance, two septuagenarian horseback riders placed a 911 cell phone call after being bucked off their horses in Granite Canyon.[49] When rangers arrived at the scene, one of the riders "was experiencing serious respiratory difficulties, and his condition was deteriorating quickly."[50] The cell phone call enabled rangers to locate the riders quickly, provide emergency assistance, and evacuate them by helicopter.[51] Cell phone calls also have helped NPS rangers rescue lost or non-critically injured snowboarders, snowshoers, skiers, bicyclists, and climbers.[52]

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[47] *Id.*

[48] Press Release, Nat'l Park Serv., Bicyclist Seriously Injured While Riding Near Jenny Lake in Grand Teton National Park (Aug. 17, 2006), http://www.nps.gov/archive/grte/news/2006/06-47.pdf; Press Release, Nat'l Park Serv., Rangers Evacuate Injured Horseback Riders by Helicopter from Granite Canyon in Grand Teton National Park (Aug. 8, 2006), http://www.nps.gov/archive/grte/news/2006/06-44.pdf.

[49] Press Release, Nat'l Park Serv., Rangers Evacuate Injured Horseback Riders by Helicopter from Granite Canyon in Grand Teton National Park (Aug. 8, 2006), http://www.nps.gov/archive/grte/news/2006/06-44.pdf.

[50] *Id.*

[51] *Id.*

[52] *E.g.*, Press Release, Nat'l Park Serv., Out-of-Bounds Snowboarder Rescued from Granite Canyon (Mar. 1, 2007), http://www.nps.gov/archive/grte/news/2007/07-05.pdf; Press Release, Nat'l Park Serv., Cyclist Collides with Parked Van on Highway 26/89/191 (July 11, 2006), http://www.nps.gov/archive/grte/news/2006/06-33.pdf; Press Release, Nat'l Park Serv., Injured Climber Rescued from Garnet Canyon (Mar. 3, 2006), http://www.nps.gov/archive/grte/news/2006/06-10.pdf; Press Release, Nat'l Park Serv., Search and Rescue Conducted for Lost Skiers in Teton Backcountry (Feb. 24, 2006),

(continued...)

Even though some federal lands have reasonably good cell phone coverage, they typically do not have enough communications towers to eliminate all dead zones within their boundaries. For example, in the Grand Teton National Park, the NPS has reported that some injured recreationalists or their companions have had to trek great distances through the Park to find a spot with adequate coverage to place a 911 call for medical assistance.[53]

The NPS has not identified the wireless telecommunications provider that carried these emergency calls in the Grand Teton National Park. Based on the coverage map, attached as Exhibit 1, Union's wireless network covers portions of these Parks. Thus, Union may have provided invaluable assistance in these or similar search and rescue operations.

IV. THE SITING OF WIRELESS COMMUNICATIONS INFRASTRUCTURE ON FEDERAL LANDS WOULD PROMOTE THE DEPLOYMENT OF SERVICE TO RURAL AREAS

The BLM also should encourage and facilitate the siting of communications towers on federal lands because it would advance significant public policy goals. As mentioned above, a purpose of the Communications Act is to promote "communication by wire and radio so as to make available . . . to all the people of the United States, . . . a rapid, efficient, Nation-wide, and world-wide wire and radio communication service."[54] The siting of communications towers

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http://www.nps.gov/archive/grte/news/2006/06-08.pdf; Press Release, Nat'l Park Serv., Injured Backcountry Skier Rescued Near Taggart Lake (Feb. 22, 2006), http://www.nps.gov/archive/grte/news/2006/06-07.pdf; Press Release, Nat'l Park Serv., Search Conducted for Lost Snowshoer in Granite Canyon (Feb. 13, 2006), http://www.nps.gov/archive/grte/news/2006/06-05.pdf.

[53] *E.g.*, Press Release, Nat'l Park Serv., Park Rangers Rescue Injured Climber from Garnet Canyon (July 23, 2006), http://www.nps.gov/archive/grte/news/2006/06-37.pdf; Press Release, Nat'l Park Serv., Injured Climber Flown from Death Canyon (July 11, 2006), http://www.nps.gov/archive/grte/news/2006/06-34.pdf.

[54] 47 U.S.C. § 151.

would coincide with the efforts of other federal agencies to promote the deployment of telecommunications in rural areas.

The BLM should revise the Kremmling and Glenwood Springs RMPs to assist other federal agencies in facilitating the deployment of wireless telecommunications to rural areas. As mentioned above, a purpose of the Communications Act is to promote the availability of wireless communications in rural areas.[55] In the Telecommunications Act of 1996, which revised the Communications Act, Congress also created a federal Universal Service Fund to promote connectivity in rural areas through financial incentives to institutions that provide telecommunications and information services.[56] In addition, the FCC has adopted several measures "to promote access to spectrum and facilitate capital formation for entities seeking to serve rural areas or improve service in rural areas."[57] The FCC also has initiated programs to increase access to communications in rural areas.[58]

Several other federal agencies also have initiated programs designed to offer discounts and other incentives for the development of telecommunications infrastructure. In particular, the

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[55] *Id.*

[56] *Id.* § 254. The Telecommunications Act of 1996 also authorized the creation of the Telecommunications Development Fund as a venture capital corporation that seeks to increase the emergence of telecommunications businesses by providing capital and management expertise to entrepreneurs. *Id.* § 614.

[57] In re Facilitating the Provision of Spectrum-Based Services to Rural Areas and Promoting Opportunities for Rural Telephone Companies to Provide Spectrum-Based Services, WT Docket Nos. 02-381, 01-14, 03-202, *Report and Order and Further Notice of Proposed Rule Making*, 19 FCC Rcd 19078, 19080 ¶ 1 (2004).

[58] *E.g.*, Federal Communications Commission, Consumer & Governmental Affairs Bureau, Lands of Opportunity: Bringing Telecommunications Services to Rural Communities (2006), *available at* http://www.fcc.gov/indians/opportunity.pdf; *see* Federal Communications Commission, Consumer & Governmental Affairs Bureau, Telecommunications Service in Rural America, http://www.fcc.gov/cgb/rural/welcome.html#facts (Mar. 9, 2007) (listing documents related to the FCC's efforts to promote the deployment of telecommunications and information services in rural areas).

U.S. Department of Agriculture ("USDA") has created a Distance Learning and Telemedicine Loan and Grant Program,[59] a Community Connect Grant Program,[60] a Rural Broadband Access Loan and Loan Guarantee Program,[61] an Expedited Telecommunications Loan and Loan Guarantee Program,[62] and a Rural Business Enterprise Grant Program.[63] The USDA also has entered into a partnership with the FCC and private industry, known as the Federal Rural Wireless Outreach Initiative, "to encourage greater access and deployment of wireless services to enhance economic development throughout rural America."[64] Other federal initiatives include, or have included, (1) the National Telecommunications and Information Administration's initiative for the planning and construction of public telecommunications facilities;[65] (2) the U.S.

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[59] U.S. Department of Agriculture, Distance Learning and Telemedicine Program, http://www.usda.gov/rus/telecom/dlt/dlt.htm (last visited Apr. 8, 2007); *see* 7 C.F.R. §§ 1703.100-1703.147 (2006).

[60] U.S. Department of Agriculture, Rural Development Community Connect Grant Program, http://www.usda.gov/rus/telecom/commconnect.htm (last visited Apr. 8, 2007); *see* 7 C.F.R. pt. 1739.

[61] U.S. Department of Agriculture, Rural Development Broadband Loan and Loan Guarantee Program, http://www.usda.gov/rus/telecom/broadband.htm (last visited Apr. 8, 2007); *see* Farm Security and Rural Investment Act of 2002, Pub. L. 107-171, 116 Stat. 134, 415-418 § 6103 (2002) (codified at 7 U.S.C. § 950bb (Supp. 2006)); 7 C.F.R. pt. 1738.

[62] U.S. Department of Agriculture, Expedited Telecommunications Loan and Loan Guarantee Program, http://www.usda.gov/rus/telecom/documents/epedited-loanprocessing-app-guide.pdf (last visited Apr. 8, 2007); *see* 7 C.F.R. pts. 1735, 1737.

[63] U.S. Department of Agriculture, Rural Business Enterprise Grants, http://www.rurdev.usda.gov/rbs/busp/rbeg.htm (last visited Apr. 8, 2007).

[64] U.S. Department of Agriculture, Joint Federal Rural Wireless Outreach Initiative, http://www.usda.gov/rus/jointoutreach/ (last visited Apr. 8, 2007).

[65] U.S. Department of Commerce, National Telecommunications and Information Administration, Public Telecommunications Facilities Program, http://www.ntia.doc.gov/ptfp/ (last visited Apr. 8, 2007).

Department of Education's initiative on community technology centers;[66] and (3) the U.S. Department of Health and Human Services's initiative on rural telemedicine grants.[67]

These federal initiatives and programs are limited in the degree to which they can advance the deployment of telecommunications and broadband services to rural areas. In particular, wireless providers often need to site communications infrastructure on federal lands to ensure that rural areas receive access to mobile wireless services. Union also requires access to federal lands to install infrastructure for its fixed wireless communications service. Union provides this fixed wireless service to many ranches and other remote residents for which the cost of building wireline service is prohibitive. Thus, the BLM should revise the Kremmling and Glenwood Springs RMPs to facilitate the deployment of wireless communications infrastructure to permit the provision of these much-needed telecommunications and broadband services.

V. THE SITING OF COMMUNICATIONS TOWERS ON FEDERAL LANDS IS CONSISTENT WITH THE BLM'S MANAGEMENT PRIORITIES

The BLM should revise the Kremmling and Glenwood Springs RMPs to facilitate the siting of wireless telecommunications infrastructure on federal lands because it would further the statutory and regulatory goals of land-use planning. Although the BLM must balance the management of various land uses in the Kremmling and Glenwood Springs Resource Areas, the siting of wireless communications infrastructure would (1) be consistent with the existing RMPs; (2) not compromise public resources; (3) support other uses of federal lands; (4) correspond to

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[66] U.S. Department of Education, Community Technology Centers, http://www.ed.gov/programs/comtechcenters/index.html (last modified Sept. 5, 2006).

[67] U.S. Department of Health and Human Services, Health Resources and Services Administration, Fiscal Year 2007 Justification of Estimates for Appropriations Committee, http://www.hrsa.gov/about/budgetjustification07/Telehealth.htm (last visited Apr. 8, 2007).

the policies of other governmental entities; and (5) benefit the local economy and the use of adjacent non-federal areas.

A. The BLM Should Continue to Allow the Siting of Major Utility Systems throughout the Kremmling and Glenwood Springs Resource Areas

The BLM currently allows the siting of wireless communications infrastructure almost anywhere in the Kremmling and Glenwood Springs Resource Areas. In the RMP materials, the BLM has requested comment on the siting of wireless communications facilities. The BLM asked whether it should identify (1) existing and potential utility corridors, and (2) existing and potential right-of-way development sites such as communications sites.[68]

In the existing Kremmling RMP, the BLM allows rights-of-way for utility and communications facilities throughout most of the Resource Area, provided the facilities will not interfere with other resource values.[69] In the existing Glenwood Springs RMP, the BLM similarly permits the siting of wireless communications infrastructure on a large majority of the Resource Area.[70] The BLM declined to designate specific utility corridors in the Glenwood Springs Resource Area "so that management decisions based on the plan would not inadvertently

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[68] U.S. Department of the Interior, Bureau of Land Management, Scoping Information Packet for Glenwood Springs Field Office 7 (2007) ("*Glenwood Springs Scoping Packet*"); Bureau of Land Management, Scoping Information Packet for Kremmling Field Office 7 (2007) ("*Kremmling Scoping Packet*"); *Preparation Plan* at 28.

[69] U.S. Department of the Interior, Bureau of Land Management, Kremmling Resource Management Plan Record of Decision 19-29 (1984), *available at* http://www.co.blm.gov/nepa/rmpdocs/kfodocs/Kremmling/KRRMRD/KRRMRD.pdf ("*Kremmling RMP*").

[70] U.S. Department of the Interior, Bureau of Land Management, Record of Decision and Resource Management Plan: Glenwood Springs Resource Area 41-44 (rev. 1988), *available at* http://www.co.blm.gov/nepa/rmpdocs/gsfodocs/Glenwood_Springs/GSRDRM/GSRDRM.pdf ("*Glenwood Springs RMP*").

constrict or preclude future sitings of utility and communication infrastructure."[71] The BLM instead chose to "provide[] greater flexibility for utility companies, BLM, and local decision makers in determining suitable locations for utilities."[72] The BLM further noted that this approach was preferable because "[t]here are no heavy concentration of avoidance areas in the Glenwood Springs Resource Area."[73] Thus, even though the BLM has identified a few specific portions of the Kremmling and Glenwood Sprints Resource Areas as unsuitable for wireless communications infrastructure, applicants generally have substantial flexibility for their siting activities.

In the revised Kremmling and Glenwood Springs RMPs, the BLM should continue to leave most of the area open for utility and communication facilities. This approach is consistent with the executive and legislative directives that require the BLM to make federal land available for the siting of wireless communications infrastructure. Furthermore, this infrastructure siting promotes the federal policies favoring emergency communications and the deployment of telecommunications to rural areas.

The BLM also should adopt a more flexible approach for the siting of major utility systems. In particular, the BLM should be aware that existing utility corridors often were not designed to accommodate the type of infrastructure necessary to provide modern wireless telephone operations. For example, the existing corridors are typically used for the siting of point-to-point microwave systems, which have different technical and operational requirements

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[71] U.S. Department of the Interior, Bureau of Land Management, Final Environmental Impact Statement on the Glenwood Springs Resource Management Plan 227 (1983) ("*Final Glenwood Springs EIS*").

[72] *Id.*

[73] *Id.*

than mobile wireless systems. The use of these existing corridors frequently results in dead zones within a wireless network. Although the BLM should designate additional utility corridors and right-of-way development sites, it should retain the Glenwood Resource Area's more flexible siting approach for facilities outside of utility corridors. The BLM also should adopt this flexible approach for the Kremmling Resource Area.

B. The BLM May Authorize the Siting of Wireless Communications Infrastructure without Compromising Public Resources

The BLM could protect public resources while continuing to permit the siting of wireless communications infrastructure in the Kremmling and Glenwood Springs Resource Areas. In the preparation of a revised RMP, section 202 of the FLPMA requires the BLM to "use and observe the principles of multiple use and sustained yield set forth in this and other applicable law."[74] The term "multiple use" refers to "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people," including wildlife and historical values.[75] The BLM also must "give priority to the designation and protection of areas of critical environmental concern" ("ACECs").[76]

The siting of wireless communications infrastructure would not have an adverse impact on environmental or cultural resources in the Kremmling and Glenwood Springs Resource Areas. As mentioned above, the BLM previously concluded that the siting of wireless communications infrastructure is permissible throughout most of these Resource Areas. Although the BLM must intensively manage any surface-disturbing activities in ACECs and

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[74] 43 U.S.C. § 1712(c)(1).

[75] *Id.* § 1702(c); *see* 43 C.F.R. § 1601.0-5(i).

[76] 43 U.S.C. § 1712(c)(3).

other similarly protected areas to prevent irreparable damage to public resources, the BLM has identified only two ACECs in the entire Kremmling Resource Area.[77]

The BLM also allows the routine siting of wireless communications facilities in the Glenwood Springs Resource Area. In particular, the BLM has designated only 20,756 acres, or four percent, of the Glenwood Springs Resource Area as completely unsuitable for utility and communication facilities.[78] The BLM routinely processes applications for the siting of wireless communications facilities on 443,993 acres, or seventy-eight percent, of the Glenwood Springs Resource Area on a case-by-case basis.[79] Finally, even for the 101,293 acres, or eighteen percent, of the Glenwood Springs Resource Area that the BLM has designated as a sensitive zone, the BLM allows applicants to site wireless communications infrastructure after mitigating the potential impact of the proposed facility on the identified sensitive resources.[80]

The BLM should continue to evaluate applications for wireless communications infrastructure on a case-by-case basis rather than adopting any blanket prohibitions. Wireless providers should have the opportunity to conduct studies demonstrating that their proposed wireless communications infrastructure would not interfere with public resources due to minimal surface disturbance, the absence of continued human presence, or other mitigating factors.[81]

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[77] *Kremmling RMP* at v, 24.

[78] *Glenwood Springs RMP* at 41. "Unsuitable zones are areas where existing fragile or unique resource values preclude location of utilities and communication facilities." *Id.*

[79] *Id.* at 41, 44.

[80] *Id.*

[81] For example, when applying for a right-of-way in an ACEC in the Lander Resource Area of Wyoming, Union engaged the services of third-party consultants to conduct field studies of various proposed communications sites. These consultants collaborated with the BLM and Indian tribes to identify any potential environmental or cultural concerns and to modify the site, as needed, to mitigate those concerns. Eventually, the third-party consultants determined that

(continued…)

C. The Siting of Wireless Communications Infrastructure Would Support Other Uses of Federal Lands

The BLM would satisfy the management requirements of the FLPMA by permitting the siting of wireless communications infrastructure on federal lands.[82] As mentioned above, section 202 of the FLPMA requires the BLM to "use and observe the principles of multiple use and sustained yield" in the revision of RMPs.[83] The term "multiple use" includes recreation, grazing, mineral extraction, and timber extraction, among others.[84]

The siting of wireless communications infrastructure would support and enhance these uses of BLM-managed lands. In the existing Kremmling RMP, the BLM found that utility and communication facility management "truly support[s] the day-to-day administration of other resource area programs."[85] The BLM noted that "communication facility authorization provides a service to all administrative program functions[,] as well as interagency and community needs."[86]

Wireless communications are essential to resource-extraction activities, such as mineral extraction, grazing, logging, and recreation. As mentioned above, energy and energy-support companies have repeatedly asked Union to establish a sound wireless network for their

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sites could be located on Beaver Rim without having any impact either on threatened or endangered species or on cultural sites.

[82] The siting of wireless communications infrastructure also addresses several "major issues" raised in the scoping notice, such as oil and gas development, increased recreation demands and uses, comprehensive travel management and transportation, and rapidly expanding urban interface areas. *Notice of Intent*, 72 Fed. Reg. at 9585.

[83] 43 U.S.C. § 1712(c)(1).

[84] *Id.* § 1702(c); 43 C.F.R. § 1601.0-5(i).

[85] *Kremmling RMP* at 15.

[86] *Id.*

emergency communications. These companies also rely on Union's wireless communications services for their day-to-day operations, such as the flow of materials and delivery of progress reports. Energy and energy-support companies would like to receive wireless broadband communications, such as e-mail and other data applications.

Wireless communications are also critical to the transmission of emergency communications. As discussed above, the traveling public has come to rely on wireless phones for emergency 911 calls. These communications are also indispensable to fire management operations and search and rescue missions involving lost or injured recreationalists on or near federal lands.

D. The Revised Kremmling and Glenwood Springs RMPs Should Complement the Policies of Other Governmental Entities

The BLM should ensure that the revisions to the Kremmling and Glenwood Springs RMPs are consistent with the policies of other governmental entities. Section 202 of the FLPMA requires the BLM to "coordinate the land use inventory, planning, and management . . . with the land use planning and management programs of other Federal departments and agencies and of the States and local governments."[87] In its FLPMA regulations and Handbook, the BLM commits to avoiding inconsistencies with the resource-related plans, policies, and programs of other governmental entities.[88] Sections 101 and 102 of the National Environmental Policy Act similarly require the BLM to prepare analyses and documentation "in cooperation with State and local governments" and other agencies with jurisdiction by law or special expertise.[89]

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[87] 43 U.S.C. § 1712(c)(9).

[88] 43 C.F.R. §§ 1610.3-1, 1610.3-2, 1610.4-4(e); U.S. Department of the Interior, Bureau of Land Management, Land Use Planning Handbook, BLM Handbook H-1601-1 at 5-9 (2005), *available at* http://www.blm.gov/nhp/200/wo210/landuse_hb.pdf.

[89] 42 U.S.C. §§ 4331(a), 4332(2) (2003); *see* 40 C.F.R. §§ 1501.6, 1508.5 (2006).

To comply with these statutory requirements, the BLM should join other federal agencies in implementing the national policy toward the deployment of wireless communications infrastructure on federal lands.[90] For example, the National Park Service requires Park Superintendents to "consider the potential benefit of having telephone access to emergency law enforcement and public safety services," underlining the importance of public safety and emergency communications on and adjacent to federal lands.[91] Park superintendents also must "consider whether the proposal would cause *unavoidable conflict* with the park's mission," indicating that the National Park Service would prohibit only those wireless communications towers that are incapable of mitigating potential harm.[92]

The BLM also should coordinate its revision of the Kremmling and Glenwood Springs RMPs with local governments. As discussed above, Union has received requests for improved coverage and emergency communications from local governmental entities in several portions of its service area.

E. The Siting of Communications Towers Would Benefit the Local Economy and the Use of Adjacent Non-Federal Areas

The BLM should provide more opportunities to site wireless communications infrastructure on federal lands because it would improve the local economy and the uses of adjacent areas. Although the BLM must weigh various principles of resource management in its

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[90] Although the FCC and the USDA are not traditional federal land use agencies, the BLM should consider their efforts to promote the deployment of telecommunications infrastructure to rural areas.

[91] *NPS Management Policies* ¶ 8.6.4.3; *see NPS Director's Order #53* § 10.3 (stating that park superintendents must consider the visiting public's telephonic access to emergency law enforcement and public safety services when reviewing applications for wireless telecommunications facilities); *NPS Reference Manual* at A5-46.

[92] *NPS Management Policies* § 8.6.4.3 (emphasis added).

preparation of an RMP, section 1601.0-8 of the BLM's rules also requires the consideration of "the impact on local economies and uses of adjacent or nearby non-Federal lands."[93]

The executive and legislative branches have already concluded that the siting of wireless communications infrastructure would benefit the local economy. For example, when President Clinton issued an Executive Memorandum directing executive departments and agencies to facilitate the siting of "mobile services antennas" on federal property, he stated that "the Federal Government shall encourage the efficient and timely implementation of . . . new technologies *and the concomitant infrastructure buildout* as a means of stimulating economic growth and creating new jobs."[94] In addition, Congress required federal agencies to make property available for the siting of wireless telecommunications facilities in the Telecommunications Act of 1996, which has the express purpose of "promot[ing] competition and reduc[ing] regulation in order to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies."[95]

In Union's service area, the siting of wireless communications infrastructure would benefit the local economy.[96] As mentioned above, Union provides wireless communications service to many companies, including energy-related companies, that work, travel, and commute in the Kremmling and Glenwood Springs Resource Areas. Wireless infrastructure would help

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[93] 43 C.F.R. § 1601.0-8. While the existing RMP for the Kremmling Resource Area "emphasizes the expansion of local and regional economies," *Kremmling RMP* at vii, the BLM announced that the new planning effort would address "[r]apidly expanding urban interface areas." *Notice of Intent*, 72 Fed. Reg. at 9585.

[94] Memorandum of August 10, 1995, Facilitating Access to Federal Property for the Siting of Mobile Services Antennas, 60 Fed. Reg. 42023, 42023 (Aug. 14, 1995).

[95] Telecommunications Act of 1996, Pub. L. No. 104-104, Preamble, 110 Stat. 56, 56 (1996).

[96] The BLM also has observed that the "[d]esignation of zones to guide placement of utility and communication facilities could have beneficial economic impacts by reducing administrative and processing time and costs for both BLM and applicants." *Final Glenwood Springs EIS* at 136.

ensure that these companies have adequate service for their day-to-day and emergency communications. These companies generate substantial revenue and jobs for the local economy.

Furthermore, wireless infrastructure would support the growing recreation and tourism aspects of the local economy. In the *Notice of Intent*, the BLM stated that it would address the "[i]ncreased recreation demands and uses" in the revised RMPs.[97] The BLM also has noted that "[r]ecreation has grown to become the predominant use of local public lands"[98] and that "[r]ecreation-based tourism generated dollars contributes significantly to the local/regional economies."[99] While the Kremmling Resource Area has approximately 308,700 visits per year,[100] the Glenwood Springs Resource Area has approximately 800,000 visits per year.[101] As discussed above, recreationalists and other visitors require wireless telephone access to ensure their safety.

The siting of wireless communications infrastructure also would benefit the use of adjacent non-Federal lands. For example, the BLM has previously committed to pursuing a flexible policy toward the siting of rights-of-way in the Glenwood Springs Resource Area to avoid "a de facto zoning of adjacent and interspersed private lands."[102] The BLM further found that a flexible siting policy would not "restrict the options available to local decisionmakers and private landowners in their determination of suitable locations on adjacent private lands."[103]

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[97] *Notice of Intent*, 72 Fed. Reg. at 9585.

[98] *Kremmling Scoping Packet* at 9; *Glenwood Springs Scoping Report* at 9.

[99] *Preparation Plan* at 19.

[100] *Kremmling Scoping Packet* at 9.

[101] *Glenwood Springs Scoping Packet* at 9.

[102] *Final Glenwood Springs EIS* at 227.

[103] *Id.*

This flexible policy should remain in place in the revised RMPs, especially because "eighty percent of public lands managed by the [Glenwood Springs Field Office] are within 1 mile of private property."[104]

The BLM should also follow a flexible siting policy to expand wireless communications service to rural areas. As mentioned above, Union has identified several coverage gaps along US-40 in the Kremmling Resource Area, as well as along other smaller state and county roads. Union also seeks to extend its coverage to include the Glenwood Springs Resource Area.

VI. CONCLUSION

Union supports the preparation of revised RMPs for the Kremmling and Glenwood Springs Resource Areas to facilitate the availability of federal lands for the siting of wireless communications towers in utility corridors and elsewhere. As discussed above, this proposal would (1) comply with numerous executive and legislative directives supporting the construction and use of wireless communications towers on federal lands; (2) enhance public safety and emergency communications; (3) promote the deployment of telecommunications to rural areas; and (4) be consistent with the management priorities of the BLM.

WHEREFORE, THE PREMISES CONSIDERED, Union respectfully requests that the BLM consider these Comments and proceed in a manner consistent with the views expressed herein. Specifically, in preparing revised RMPs and an EIS for the Kremmling and Glenwood Springs Resource Areas, the BLM should conclude that:

1. Wireless communications play an increasingly critical role in day-to-day aspects of modern life, particularly in rural areas and in support of recognized uses of BLM-managed lands;

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[104] *Preparation Plan* at 24.

2. The siting of wireless communications infrastructure is essential to provide the public with telephonic access to emergency law enforcement and other public safety services in areas on and adjacent to BLM-managed lands;

3. The siting of wireless communications infrastructure would ensure the availability of wireless communications in rural areas;

4. The siting of wireless communications infrastructure would improve the local economy and the uses of adjacent areas, stimulating economic development and creating new jobs;

5. Wireless providers should have the flexibility to site their wireless communications infrastructure outside of designated utility corridors;

6. When necessary, the designation of utility corridors and ROW development sites would facilitate the siting of wireless communications infrastructure.

Respectfully submitted,

UNION TELEPHONE COMPANY

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May 2, 2007

VIA EMAIL: Joe_Stout@blm.gov

Mr. Joe Stout
RMP Manager
Bureau of Land Management
Kremmling Field Office
P.O. Box 68
Kremmling, Colorado 80459

Re: Scoping Comments for Kremmling Field Office and Glenwood Springs Filed Office Resource Management Plan and Associated Environmental Impact Statement

Dear Mr. Stout:

The Kremmling Field Office (KFO) and Glenwood Springs Field Office (GSFO) of the Bureau of Land Management (BLM) are soliciting scoping comments for the joint revisions of the Resource Management Plan (RMP) and associated Environmental Impact Statement (EIS) for the Kremmling and Glenwood Springs planning areas, as noticed in the March 2, 2007 Federal Register, 72 Fed. Reg. 9584-01. According to the KFO website, http://www.blm.gov/rmp/co/kfo-gsfo, and materials found thereon, scoping comments are due by May 2, 2007. These comments are being provided electronically via email pursuant to the instructions on the above-referenced website.

We represent Galloway, Inc., owner of Blue Valley Ranch ("BVR"). BVR owns property in Grand County and Summit County. BVR is within the KFO planning area, and owns land along the Blue River from roughly somewhat upstream of Spring Creek Road to Trough Road. Land owned by BVR also abuts land currently owned by the BLM. As a property owner in the KFO planning area, BVR is an interested stakeholder in the RMP revision process. Representatives of BVR have attended BLM work shops and have to the extent time has permitted, tried to follow the process.

We have been asked by BVR to submit the following comments regarding the scope of the RMP revision process.

1. The RMP process should result in a plan that reduces and minimizes the conflicts between private property owners and users of the public lands;

2. The RMP process should result in a plan that contains measures to reduce and minimize human injuries and fatalities and wildlife mortalities and associated property loss associated with collisions between motor vehicles and wildlife;

3. The RMP process should result in proactive resource management measures to address the need for extensive re-forestation in the wake of the beetle kill being experienced in the KFO planning area.

4. The RMP process should not interfere or delay the development and implementation of a Blue River Management Plan designed for resource protection. The Blue River Management Plan development process began in 2006 and should not be delayed or be on the lengthy timetable of the RMP Process. If the stakeholders in this process can pull together a plan, its implementation should not be tied to the timetable of a revision to the RMP.

5. The RMP process should not result in the delay of needed responses and decisions from the BLM. BVR operations include those of an active working ranch and conservation enterprise. As a "neighbor" to the BLM, it is in frequent communication with the BLM on management, recreation, resource and property issues. As one of many "BLM neighbors" in the KFO planning area, we ask that needed responses and decisions not be delayed as a result of the RMP planning process being underway. That is, we request that ongoing "business of the BLM" continue during the lengthy planning process and associated environmental/NEPA reviews being pursued by the two BLM field offices.

Finally, BVR and the undersigned intend to closely follow your process and hereby request that you add the following individuals to the contact list for the planning process:

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Kremmling, CO 80459
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Phone: 970-724-3768
Fax: 970-724-0210

Thank you for the opportunity to provide this input to the RMP planning process scoping effort. The BLM's favorable consideration of these suggestions will be appreciated. During the planning process BVR will provide additional input as the process unfolds.

Sincerely,

James W. Sanderson
For the Firm

JWS\kj

cc: Perry Handyside – *Via Email*

Organizations

From: BLM Form Mailer
Date: Wednesday, May 02, 2007 6:23:40 PM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Dawnie**
lastName	**Baldo**
address	**PO Box 76**
city	**Hot Sulphur Springs**
state	**CO**
zipCode	**80451-0076**
phone	**970.725.3556**
email	**dja@rkymtnhi.com**
Mailing_List	**yes**
Other_Affiliation	**National Scenic Byway**
Question_1	**Over use of the resources on Grand County Road 1/Trough Road, particularly in the summer with river activites, i.e., rafting, fishing, etc. that creates impact to the driving route and resources. BLM does a great job now, but I would hate to see the use increased.**
Question_2	**Changes to the landscaep would significantly degrade the beauty of this resource. Continue to limit river use and guided hunt permits and hold permit holders to high accountability standards in good stewardship of the resource. Coninued partnership with CDOW is essential to preserve the wildlife resources along the river cooridor.**

Question_3	**Continue to work with Colorado River Headwaters National Scenic Byway for planning and interpretive opportunties.**
Question_4	**I support the wild and scenic river designation.**
Submit	**Submit Comments**
MM_insert	**form1**

* The Wilderness Society *
* Colorado Environmental Coalition *
* American Rivers, Inc.*
* Wilderness Workshop *

RECEIVED
MAY - 3 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

May 2, 2007

Via e-mail (cormpkg@blm.gov) and overnight mail (with attachments)

Bureau of Land Management
Kremmling Field Office
Joe Stout, RMP Project Manager
P.O. Box 68
Kremmling, CO 80459

Re: Area of Critical Environmental Concern and Special Recreation Management Area Proposal for the Glenwood Springs and Kremmling RMPs

With this letter, The Wilderness Society (TWS), the Colorado Environmental Coalition (CEC), American Rivers, Inc., and the Wilderness Workshop are submitting their proposal for special management areas to be designated during the Glenwood Springs and Kremmling Resource Management Plan (RMP) revisions. In accordance with the issues identified in BLM's Notice of Intent, this proposal identifies areas that meet the criteria for designation as Areas of Critical Environmental Concern (ACECs), as well as exhibiting naturalness and providing opportunities for solitude, primitive recreation (Special Recreation Management Areas (SRMAs)), and habitat management for animal and plant species. This proposal is in addition to general scoping comments submitted separately and to the proposal submitted separately by the conservation groups for protection of lands with wilderness characteristics.

At the outset, the conservation groups urge BLM to retain the ACECs and other special management areas currently designated in the RMPs governing BLM-managed lands in the Glenwood Springs and Kremmling planning areas. The attached sets out more specific proposals for additional protection of lands, including but not limited to those contained in the Citizens' Wilderness Proposal, through nomination as ACECs, Special Recreation Management Areas (SRMAs) and/or other special management prescriptions.

The Federal Land Policy and Management Act (FLPMA) requires BLM to "give priority to the designation and protection of areas of critical environmental concern [ACECs]." 43 U.S.C. § 1712(c)(3). All of the areas identified in our submissions for designation as ACECs qualify as ACECs in accordance with FLPMA, applicable regulations (43 C.F.R. 1610.7-2) and BLM Manual 1613. They are uniquely wild and unspoiled, with resulting intact plant and wildlife habitat and protected cultural sites. These areas all contain important historic, cultural or scenic values, plant and wildlife resources or other natural systems or processes that are relevant (having significant values) and important (having

special significance and distinctiveness by being more than locally significant and/or especially rare, fragile or vulnerable), and require special management attention to protect and prevent damage to these values.

In addition, we have included SRMA proposals for a number of areas. These areas present exceptional opportunities for primitive recreation, which can provide important benefits to the nearby expanding urban areas and other users of the public land, but must be specially managed to preserve their distinctive character and setting. In accordance with BLM's Land Use Planning Handbook, Appendix C, Section II.C, BLM should identify and designate SRMAs, including their recreation "niches," recreation management objectives, character setting conditions and management strategy. The SRMAs proposed in this submission should be identified in the Glenwood Springs and Kremmling RMPs and managed to protect the natural setting that supports outstanding opportunities for primitive recreation.

The detailed information on values and threats, as well as the proposal for best management of these areas, constitute significant new information that was not considered during the preparation of the previous Glenwood Springs and Kremmling RMPs. It is vital that BLM fully assess this proposal and consider the impact of alternative management decisions on the special areas we have identified.

We are available to answer questions and provide further information regarding our proposal and look forward to continuing to discuss the protection of these valuable resources throughout the planning process.

Sincerely,

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* The Wilderness Society * Colorado Environmental Coalition *
Center For Native Ecosystems * American Rivers, Inc. *
* Colorado Mountain Club * Wilderness Workshop *

May 2, 2007

RECEIVED
MAY - 3 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Via e-mail (cormpkg@blm.gov) and overnight mail (with attachments)

Bureau of Land Management
Kremmling Field Office
Joe Stout, RMP Project Manager
P.O. Box 68
Kremmling, CO 80459

Re: Scoping Comments – Glenwood Springs and Kremmling RMPs

Please accept and fully consider these scoping comments on behalf of The Wilderness Society (TWS), the Colorado Environmental Coalition (CEC), Center for Native Ecosystems (CNE), American Rivers, Inc., the Colorado Mountain Club (CMC) and the Wilderness Workshop.

The Wilderness Society has been involved in land management since 1935, and has a vested interest in the Glenwood Springs and Kremmling RMP Revisions. With over 300,000 members and supporters nation-wide, TWS represents a diverse range of citizens. Our goal at TWS is to ensure that land management practices are sustainable and based on sound science to ensure that the ecological integrity of the land is maintained.

The Colorado Environmental Coalition is the largest state-based citizens' group committed to conserving our clean air, water and open spaces for generations to come. By strengthening the effectiveness of Colorado's environmental community, the Coalition has a legacy of success for our state's wild places and quality of life. With the help of our thousands of members across the state who recognize that the economic value our wild places offer is as important to Colorado as the spiritual fulfillment these public lands provide residents and visitors, the Coalition is a powerful voice for our state.

Center for Native Ecosystems is dedicated to the conservation and recovery of native and naturally functioning ecosystems in the Greater Southern Rockies. We value the clean water, fresh air, healthy communities, sources of food and medicine, and recreational opportunities provided by native biological diversity. We also passionately believe that all species and their natural communities have the right to exist and thrive. CNE uses the best available science to forward its mission through participation in policy, administrative processes, legal action, public outreach and organizing, and education. We have commented extensively on natural resource issues in the Glenwood Springs and Kremmling Field Offices.

American Rivers is the national voice for rivers and river communities. Headquartered in Washington, D.C., American Rivers has eight field and regional offices and more than 50,000 members throughout the country. Founded in 1973, American Rivers has a long history of

promoting designations of and providing protection for the National Wild and Scenic Rivers System.

The Colorado Mountain Club is one of Colorado's oldest and largest outdoor organizations. With a membership of 10,000 people in 15 chapters around the state, the Colorado Mountain Club works to protect and educate people about the habitats, species, wildness, and quiet backcountry experiences in the Southern Rockies region. Members recreate in lands administered by the Glenwood Springs and Kremmling Offices and have a deep interest in the protection and sustainable management of these lands.

The Wilderness Workshop's mission is to protect and conserve the wilderness and natural resources of the Roaring Fork Watershed, the White River National Forest, and adjacent public lands. The Workshop is a non-profit organization that engages in research, education, legal advocacy, and grassroots organizing to protect the ecological integrity of local landscapes and public lands with a focus on the monitoring and conservation of air and water quality, wildlife species and habitat, natural communities and lands of wilderness quality.

We appreciate this opportunity to comment and commend the Bureau of Land Management in undertaking this planning process to address the circumstances and values inherent in management of the public resources within Grand, Eagle, Jackson, Larimer, Summit, Garfield, Mesa, Pitkin, Rio Blanco, and Routt Counties. Some of the above groups are submitting these comments in addition to Special Management Area Proposals and Wilderness Proposals, both of which will be submitted separately.

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PUBLIC PARTICIPATION OPPORTUNITIES

Thus far, the Glenwood Springs and Kremmling BLM offices have done a very good job of maximizing public participation opportunities. We commend BLM for holding six public

meetings during the public scoping period and for providing a generous 60 day scoping period. We also appreciate the very useful and informative website that has been established for the RMP revisions. We hope BLM continues this openness and transparency throughout the RMP development process. We provide the following recommendations in the hope that BLM will continue to build on the public participation it has encouraged up to this point.

We encourage BLM to maximize public involvement in preparation of the revised Glenwood Springs and Kremmling RMPs. In addition to the public comment periods required by the National Environmental Policy Act (NEPA) and BLM's regulations, there are other opportunities throughout the planning process for public involvement, which are used by many BLM offices. Public involvement allows the public to provide useful information and bring concerns to BLM's attention throughout the planning process. We encourage BLM to hold public meetings to present its management alternatives prior to publishing the Draft RMP. We would also encourage the BLM to provide for public input into the management situation analysis and identification of planning issues, and on a preliminary range of alternatives prior to preparing the Draft RMP - steps other BLM offices have taken to expand opportunities for public comment.

The planning teams for these RMP revisions have identified the need to ensure sufficient data is available. In this context, we would also note that other BLM offices have made inventory data available to the public to assist in identifying new data needs and also made base data available for public use. We encourage the BLM's planning teams to take similar action for these RMP revisions. By way of example, along with its release of the Draft RMP, the BLM's Arizona Strip Field Office provided zipped GIS files for all data layers needed to create the maps contained in the Draft RMP (and can be viewed on-line at http://www.blm.gov/az/GIS/files.htm#strip). This same office also provided zipped GIS files for all data layers needed to create the maps contained in the Final/Proposed RMP/EIS (available online at: https://www.blm.gov/az/GIS/files.htm#strip). The server space required for this operation is minimal and without this information, effective public participation in this process is severely hampered. This type of public participation is also consistent with the BLM's Land Use Planning Handbook (H-1601-1), which states that, "Documentation supporting the AMS [analysis of the management situation] should be maintained in the field office for public review" (Section III.A.4) and that, "Alternatives should be developed in an open, collaborative manner, to the extent possible" (Section III.A.5). We hope to see these types of opportunities provided to the many members of the public who are interested in the development of the Glenwood Springs and Kremmling RMPs.

Recommendation: The BLM should make every attempt to encourage the public to participate in the RMP revision including holding workshops, making a preliminary range of alternatives available for public comment prior to preparing Draft RMPs, and posting GIS files to the RMP revision website.

COOPERATING AGENCIES

Based on the recent revisions to BLM's regulations governing cooperating agencies (43 C.F.R. Part 1600), cooperating agencies will have an even stronger presence throughout the RMP planning process. In order to permit the public to better understand the roles of these agencies,

we request that BLM identify those agencies and tribal and local government entities that have been granted cooperating agency status, and disclose the areas of expertise or other qualifications that form the basis of their cooperating agency status.

Recommendation: The BLM should identify the agencies and tribal and local government entities granted cooperating agency status and post this information on the RMP revision website.

FLPMA REQUIRES PROTECTION OF NATURAL RESOURCES

The Federal Land Policy and Management Act ("FLPMA"), 43 U.S.C. § 1701 *et seq.*, imposes a duty on BLM to identify and protect the many natural resources found in the public lands governed by these RMPs. FLPMA requires BLM to inventory its lands and their resource and values, "including outdoor recreation and scenic values." 43 U.S.C. § 1711(a). FLPMA also obligates BLM to take this inventory into account when preparing land use plans, using and observing the principles of multiple use and sustained yield. 43 U.S.C. § 1712(c)(4); 43 U.S.C. § 1712(c)(1). Through management plans, BLM can and should protect wildlife, scenic values, recreation opportunities and wilderness character present in the public lands through various management decisions, including by excluding or limiting certain uses of the public lands. See 43 U.S.C. § 1712(e). This is necessary and consistent with the definition of multiple use, which identifies the importance of various aspects of wilderness characteristics (such as recreation, wildlife, natural scenic values) and requires BLM's consideration of the relative values of these resources but "not necessarily to the combination of uses that will give the greatest economic return." 43 U.S.C. § 1702(c).

Under FLPMA, BLM is also obligated to "give priority to the designation and protection of areas of critical environmental concern [ACEC]." 43 U.S.C. § 1712(c)(3). ACECs are areas where special management attention is required "to protect and prevent irreparable damage." 43 U.S.C. § 1702(a). Protection of existing ACECs and due consideration of proposed ACECs must be a priority in the RMP planning process.

Further, FLPMA requires that: "In managing the public lands the [Secretary of Interior] shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands." 43 U.S.C. §1732(b). In this context, when the imperative language "shall" is used, "Congress [leaves] the Secretary no discretion" in how to administer FLPMA. *NRDC v. Jamison*, 815 F.Supp. 454, 468 (D.D.C. 1992). BLM's duty to prevent unnecessary or undue degradation under FLPMA is mandatory, and BLM must, at a minimum, demonstrate compliance with the UUD standard. *See*, *Sierra Club v. Hodel*, 848 F.2d 1068, 1075 (10th Cir. 1988) (the UUD standards provides the "law to apply" and "imposes a definite standard on the BLM.").

Recommendation: The BLM must uphold its responsibility to protect the abundant natural values present in the Glenwood and Kremmling Field Offices when developing management alternatives in these RMPs and evaluating their environmental consequences, as required by both FLPMA and the National Environmental Policy Act (NEPA), 42 U.S.C. § 4321 *et seq.*).

SCOPE OF OIL AND GAS LEASING

The Roan Plateau planning area is not included in the Glenwood Springs Field Office portion of the Glenwood Springs and Kremmling RMPs planning areas and BLM personnel have indicated that the remainder of the planning areas does not contain significant areas of known high potential for oil or gas. Not including the Roan Plateau, approximately 366,000 acres of federal mineral estate are currently leased for fluid minerals in the Glenwood Springs Field Office. In the Kremmling Field Office, approximately 171,000 acres of federal mineral estate are currently leased for fluid minerals. When combined, almost 540,000 acres of fluid mineral estate are already leased in the planning area. Of the 540,000 acres under lease, a full 430,000 acres are not currently held in production (108,070 acres held in production in GSFO and 11,795 acres held in production in KSFO – a total of 120,000 acres)[1]. This means that of the federal minerals already leased by energy companies, less than 22% are actively being developed. Further, 19 leases encompassing over 11,500 acres in the Glenwood Springs Field Office and 17 leases encompassing over 10,000 acres were allowed to expire by the companies which held them or were terminated by BLM for failure of the company to pay its annual fee since the year 2000 alone. Four leases, totaling almost 850 acres will expire in what remains of 2007 if oil and gas companies do not begin the Application for Permit to Drill (APD) process, apply for an extension, or apply for unitization with another lease. BLM must include this trend analysis as it moves forward with creating its Reasonable Foreseeable Development (RFD) scenario and when deciding which areas should remain open to fluid mineral leasing.

BLM must consider the following when deciding which areas to allow fluid mineral leasing and development: 1) the BLM has a multiple use mandate and must manage its lands for a variety of uses, not primarily for oil and gas development. 43 U.S.C. § 1712(c)(1); 2) BLM must consider a *reasonable* range of alternatives in regards to areas open to oil and gas leasing. 40 C.F.R. § 1502.14; and 3) any decision which leaves the vast majority of the Field Offices open to oil and gas development will preclude the effectiveness or long term viability of any conservation measures as there is always the potential that those conservation measures could be jeopardized by oil and gas development, regardless of how low the potential for development is currently.

1. <u>The BLM has a multiple use mandate and must manage its lands for a variety of uses, not primarily for oil and gas development.</u>

FLPMA obligates the BLM to abide by the principles of multiple use and sustained yield, especially during the land use planning process. Specifically, multiple-use is defined as:

> ...the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and non-renewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and

[1] All acreage figures and leasing data collected using the LR2000 system. See **attached** leasing statistics for each Field Office.

not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output. 43 U.S.C. § 1702(c).

The definition of multiple use makes it clear that the BLM is obligated to manage the land for a number of resources other than oil and gas leasing, and states specifically that the BLM should manage some land for less than all of the resources and should not always be concerned with managing the land in order to receive the greatest economic return. The definition of multiple-use makes it clear that simply because a particular resource exists does not mean that the BLM needs to be able to extract that resource for a profit. Because Roan Plateau is not included in this planning effort and because of the large amount of existing leases not currently held in production, the realistic future for an economically extractable supply of oil and gas is low, particularly in the Kremmling Field Office. It is well within the realm of BLM's multiple-use mandate to not have a significant portion of these Field Offices open to oil and gas leasing. Further, BLM should consider alternatives which choose not to re-lease areas formerly leased when those leases expire or are terminated. Areas where there are specific resource concerns or that are identified as important habitat should be considered for other uses besides oil and gas leasing. These areas may include, but are not limited to: Areas of Critical Environmental Concern, Special Recreation Management Areas, Potential Conservation Areas, critical habitat, areas with cultural resources, proposed wilderness and lands with wilderness characteristics.

BLM's answer to charges that it is not adequately protecting resources from oil and gas impacts is often to provide leasing with No Surface Occupancy (NSO) stipulations. While NSO stipulations are a marked improvement over offering leases with standard lease terms, it is important to note that NSO stipulations do not necessarily resolve the wildlife and other resource concerns associated with oil and gas leasing. There are adverse consequences to wildlife associated with oil and gas development, regardless of whether or not there is an NSO stipulation on the lease. An example of this, noted by Clait Braun (2006) in *A Blueprint for Sage-grouse Conservation and Recovery*, a copy of which has been provided along with these comments, is that "oil and gas development influenced the rate of nest initiation of sage-grouse in excess of 3 km of construction activities. Clearly, the amount and (likely) frequency of noise associated with development has major negative effects on greater sage-grouse."

Further, BLM often offers companies exceptions, modifications or waivers from the application of NSO stipulations. Having NSO stipulations on a majority of the lands within the Field Offices is better than allowing surface occupancy in terms of wildlife and resource concerns, but that does not supplant the BLM's obligation to manage for a variety of resources, of which oil and gas is only one.

2. <u>NEPA requires the BLM to consider and evaluate a reasonable range of alternatives for oil and gas development.</u>

The range of alternatives is "the heart of the environmental impact statement." 40 C.F.R. § 1502.14. NEPA requires BLM to "rigorously explore and objectively evaluate" a range of alternatives to proposed federal actions. *See* 40 C.F.R. §§ 1502.14(a) and 1508.25(c). "An agency must look at every reasonable alternative, with the range dictated by the nature and scope of the proposed action." <u>Northwest Envtl Defense Center v. Bonneville Power Admin.</u>, 117 F.3d 1520, 1538 (9th Cir. 1997). An agency violates NEPA by failing to "rigorously explore

and objectively evaluate all reasonable alternatives" to the proposed action. City of Tenakee Springs v. Clough, 915 F.2d 1308, 1310 (9th Cir. 1990) (quoting 40 C.F.R. § 1502.14). This evaluation extends to considering more environmentally protective alternatives and mitigation measures. *See, e.g.*, Kootenai Tribe of Idaho v. Veneman, 313 F.3d 1094,1122-1123 (9th Cir. 2002) (and cases cited therein). For this Draft RMP, the consideration of more environmentally protective alternatives is consistent with the requirement of FLPMA to "minimize adverse impacts on the natural, environmental, scientific, cultural, and other resources and values (including fish and wildlife habitat) of the public lands involved." 43 U.S.C. §1732(d)(2)(a).

NEPA requires that an actual "range" of alternatives is considered, such that the Act will "preclude agencies from defining the objectives of their actions in terms so unreasonably narrow that they can be accomplished by only one alternative (i.e. the applicant's proposed project)." Colorado Environmental Coalition v. Dombeck, 185 F.3d 1162, 1174 (10th Cir. 1999), citing Simmons v. United States Corps of Engineers, 120 F.3d 664, 669 (7th Cir. 1997). This requirement prevents the EIS from becoming "a foreordained formality." City of New York v. Department of Transp., 715 F.2d 732, 743 (2nd Cir. 1983). *See also*, Davis v. Mineta, 302 F.3d 1104 (10th Cir. 2002).

In order to comply with NEPA, BLM must consider a broad spectrum of alternatives in regards to which lands will be available for oil and gas leasing. A Draft RMP which leaves all the lands within the planning area open to oil and gas leasing or only allows for very slight differences between the alternatives in this regard fails to meet the "reasonable range of alternatives" directive. BLM has an obligation to rigorously explore and evaluate a range of alternatives.

3. A decision which leaves the vast majority of the Field Offices open to oil and gas development necessarily negates the effectiveness or long term viability of any conservation measures as there is always the potential that those conservation measures could be jeopardized by oil and gas development, regardless of how low the potential for development is.

BLM has an opportunity in these RMPs, due to the lesser oil and gas potential of much of the area, to make great strides in conservation and habitat restoration. However, the long term viability of these strategies, programs and goals could be severely impacted by oil and gas development. Oil and gas development is known to cause a variety of problems that are detrimental to wildlife, and by leaving nearly the entire planning area open to leasing, the BLM may undermine any conservation efforts or goals it identifies in the RMPs. The West is pockmarked with many places which were left open to oil and gas leasing based on the belief that these areas had low potential for development. As a result, when an economically recoverable reservoir of oil and/or gas was discovered, the area had insufficient protection measures in place.

This lack of forethought has created many problems for wildlife and other resources. The impacts from oil and gas development are now well known, as such, areas of high ecological or cultural resource density should simply not be available for leasing. For example, Clait Braun, a leading researcher on sage grouse in the west, has stressed the impacts that oil and gas development can have on sage grouse populations:

> Road building, well pad construction, and noise disturbance associated with oil and gas development can fragment effective sage grouse habitat and compromise the quality of seasonal use areas. In addition, by creating more linear areas and smaller habitat patches, energy development can boost predation rates on sage grouse. So, for a variety of reasons, major oil and gas development reduces the area useable by sage grouse, which often leads to greater isolation of populations and a reduced ability to handle droughts, severe winters, or other natural disturbances[2]

BLM simply cannot expect to have ecologically effective sage grouse habitat, or any other type of important wildlife habitat, and unlimited oil and gas development in the same area. A situation arrives in which the goals, programs, and designations BLM uses to protect a valuable resource is only effective until such time that the right technology and/or price of oil and gas reaches a point that a previously non-economically extractable supply becomes economically extractable, or until a previously unknown supply not thought to exist is discovered. The Kremmling Field Office, for instance, recently received and is planning to offer leases on the border of the Troublesome WSA and on Wolford Mountain, areas BLM geologists do not believe contains significant oil or gas resources. History tells us that BLM must consider the impacts of oil and gas development across the planning area and close areas which have important wildlife, cultural, or wilderness values.

Recommendations: In order for the BLM to comply with FLPMA and NEPA the agency should, at a minimum, consider and "rigorously explore" the possibility and design alternatives which do not leave a significant portion of these Field Offices open to oil and gas leasing. *See* 43 U.S.C. § 1712(c)(1) and 40 C.F.R. §§ 1502.14(a) and 1508.25(c). Since the BLM does not believe that the potential for significant oil and gas development is very likely, we recommend, at a minimum, that the areas identified as having "low" oil and gas potential be removed from consideration for leasing. Further, BLM must consider a range of alternatives that will address what to do with currently leased lands which are not developed and are either terminated or expire. Not allowing oil and gas leasing in these areas would help the BLM move towards meeting its goal of managing the federal lands within its jurisdiction for a variety of uses, not primarily for oil and gas leasing. For lands which area identified as appropriate for leasing, a variety of non-waivable stipulations, conditions of approvals (COAs), and Best Management Practices (BMPs – discussed later) should be developed to protect the many resources present in the planning area.

ADDITIONAL IMPACTS OF OIL AND GAS DEVELOPMENT

NEPA requires that federal agencies take a "hard look" at the direct and indirect environmental impacts of oil and gas development before any action that will lead to such development takes place. *See, e.g., Pennaco Energy, Inc. v. U.S. Department of the Interior*, 377 F.3d 1147 (10th Cir. 2004); *Conner v. Burford*, 848 F.2d 1441 (9th Cir. 1988); *Sierra Club v. Peterson*, 717 F.2d

[2] This paragraph is adapted from detailed scoping comments on Upper Green sage grouse population trends and management issues prepared by Dr. Braun and submitted to the Pinedale BLM in October, 2002. Contact Linda Baker, Upper Green River Valley Coordinator (307-360-7198) to receive a copy of his 14 page comment letter.

1409 (D.C. Cir. 1983). NEPA's regulations further provide that the "effects" on the environment that agencies must consider include those that are "direct, indirect, or cumulative." 40 C.F.R. § 1508.8. The NEPA regulations define "cumulative impact" as:

> the impact on the environment which results from the **incremental impact of the action when added to other past, present, and reasonably foreseeable future actions** regardless of what agency (Federal or non-Federal) or person undertakes such other actions. **Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.**

40 C.F.R. § 1508.7. (emphasis added). The analysis of impacts included in the FEIS must adequately address the cumulative impacts of oil and gas operations within the region or the impacts inherent in the proposed action.

Federal caselaw amplifies that agencies must disclose the direct and indirect environmental effects a federal action will have on non-federal lands. *See* *City of Davis v. Coleman*, 521 F.2d 631, 677-81 (9th Cir. 1975) (where federal approval of highway project likely to have impacts on development of surrounding area, agency must analyze development impacts in EIS); *Coalition for Canyon Preservation v. Bowers*, 632 F. 2d 774, 783 (9th Cir. 1980) (same); *Sierra Club v. Marsh*, 769 F.2d 868, 877-89 (1st Cir. 1985) (striking down EA where agency failed to account for private development impacts likely to result from its approval of causeway and port facility); *Mullin v. Skinner*, 756 F.Supp 904, 920-22, (E.D. N.C. 1990) (striking down EA where agency failed to account for private development impacts likely to result from agency approval of bridge). Such impacts must be disclosed, particularly where facilitating private development may be the project's "reason for being," *See* *Citizens Comm. Against Interstate Route 675 v. Lewis*, 542 F.Supp. 496, 562 (S.D. Ohio 1982).

1. BLM must consider impacts from local gravel pit operations.

Local gravel pit operations will likely continue to increase due to the booming oil and gas extraction on BLM lands in Western Colorado. Specifically, we urge the BLM to examine the social, economic, and environmental impacts related to the increase in local gravel pit operations within the Colorado River corridor. It is well documented that the increase in oil and gas development in the region has motivated a frenzy of new and expanded gravel pits between Glenwood and Grand Junction.[3] The proliferation of gravel pits is directly connected to increasing oil and gas development on public lands and promises significant impacts.[4]

The impacts associated with gravel pits promise to be various and wide-ranging; and will result from oil and gas development not only in the Glenwood Springs and Kremmling Field Offices,

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[3] *See* Donna Gray, "P & Z Approves Gravel Pit Near Silt," Glenwood Springs Post Independent, January 17, 2007; Donna Gray, "Commissioners Approve Gravel Pit Near Silt," Glenwood Springs Post Independent, April 3, 2007; Donna Gray, "Mayors, Commissioners Mull Gravel Pits," Glenwood Springs Post Independent, February 9, 2007; Donna Gray, "No Satisfaction for Downvalley Towns at Gravel Pit Meeting," October 31, 2006; Heidi Rice, "A Toll Booth to Pay for Gravel Pit Impacts," Glenwood Springs Post Independent, February 2, 2007; Donna Gray, "County P & Z Delays Approval on Gravel Pit Near Silt," Glenwood Springs Post Independent, October 25, 2006; Donna Gray, "Gravel Pits Growing Along the Colorado," Vail Daily, March 22, 2006.

[4] *See* Donna Gray, "P & Z Approves Gravel Pit Near Silt," Glenwood Springs Post Independent, January 17, 2007.

but also throughout this region. An adequate analysis will take into account economic impacts of such unsightly development at the front door of towns like Silt, Rifle, and Newcastle.[5] The economic implications of extensive mining in proximity to these towns remains unknown and unanalyzed, but decisions made by the BLM on public lands which are fueling the need for this flurry of gravel development guarantee significant impacts on the economic wellbeing of various municipalities. In fact, ongoing approval of oil and gas development without further knowledge may jeopardize the historic and economic character of communities that BLM lands have traditionally served.

There are also environmental and social health issues that remain unknown and unquantified. Increased gravel mining will likely result in degradation of air and water quality and will impact human residents as well as fish, wildlife, and vegetation. The BLM's analysis of environmental impacts associated with ongoing oil and gas development must extend beyond wellheads, such an analysis must scrutinize all cumulative and connected actions. The infrastructure necessary to support permitted activities may come at a significant cost to local people and the environment. These costs should be accounted for in planning and permitting processes. The BLM should understand and articulate these impacts before allowing further development. NEPA mandates such analysis.

Recommendation: BLM should assess the potential impacts of use of gravel pits to support oil and gas development, and develop alternatives that avoid or mitigate these impacts.

2. BLM must consider impacts of region-wide development and also consider impacts on private lands.

While the planning areas for these RMPs do not encompass some of the most intensive current and expected oil and gas development, existing development from neighboring planning areas as well as development within the Field Offices affects the planning areas. Similarly, although the BLM may not have formal control over adjacent private lands, these lands can also be affected by oil and gas development. The impacts of oil and gas development do not recognize management boundaries.

Recommendation: In considering the need and ways to manage these lands to protect the many resources of these public lands, the agency must consider the cumulative impacts from regional oil and gas development and the cumulative impacts to adjacent lands from oil and gas development. This analysis should inform the manner in which BLM allocates lands as available or unavailable for oil and gas development and the conditions under which development may be permitted.

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[5] In fact, the impacts of gravel mining are already being felt within the Colorado River corridor. Mayors in several corridor municipalities have called for a moratorium on further applications for gravel pits until a plan for reclamation and environmental protection is developed for the entire corridor. *See* Donna Gray, "P & Z Approves Gravel Pit Near Silt," Glenwood Springs Post Independent, January 17, 2007.

BEST MANAGEMENT PRACTICES FOR OIL AND GAS

While we believe BLM should use its discretion to close ACECs, SRMAs, lands with wilderness characteristics, and vital wildlife and rare plant habitat to oil and gas development, we recognize that significant portions of the planning areas may well remain open to oil and gas development. It is vital that the RMPs require the use of best management practices (BMPs) for oil and gas exploration and development, which can drastically reduce the impacts of oil and gas development on the other natural resources of the public lands.

BLM's guidance requires consideration of BMPs for oil and gas development. BLM's Instruction Memorandum 2004-194 directs consideration of BMPs and both the IM and the recently updated Gold Book provide examples of BMPs that can be applied to both new and existing leases, in order to limit the damage from oil and gas development. It is critical that the RMPs consider and make BMPs mandatory in order to comply with BLM's guidance and obligations to protect the many natural values of these lands.

Recommendations: The Glenwood Springs and Kremmling RMPs must identify BMPs and make them mandatory, especially in sensitive areas. BMPs should include:

- Phased or strategic development - in terms of timing (developing one area, then restoring before moving to another), location (such as staying out of big game corridors), limiting amount of equipment in use at any given time, limiting amount of surface disturbance on a lease at any given time and requiring successful restoration before permitting additional disturbance;
- directional drilling;
- clustered drilling;
- closed loop drilling;
- interim reclamation;
- restoration standards;
- unitization; and
- increased bonding.

PROTECTION OF WILDERNESS CHARACTER

The Glenwood Springs and Kremmling Field Offices contain pristine wildlands, including those identified in the Citizens Wilderness Proposal (CWP), which are included in a report that will be submitted under separate cover in the near future. Section 201 of the Federal Land Policy and Management Act (FLPMA, 43 U.S.C. § 1701, et seq.) mandates that BLM inventory the resources of the public lands, their resources and values. 43 U.S.C. § 1711. In the land use planning process, including revision of RMPs, Section 202 of FLPMA requires that BLM take into account the inventory and determine which multiple uses are best suited to which portions of the planning area. 43 U.S.C. § 1712. BLM's mandate of multiple use and sustained yield, as well as other relevant law and BLM's current guidance, provides for inventory and protection of wilderness values. **BLM is obligated to inventory for and consider a range of alternatives to protect lands with wilderness characteristics.**

1. Wilderness character is a valuable resource and important multiple use of the lands governed by the Glenwood Springs and Kremmling RMPs.

BLM has identified "wilderness characteristics" to include naturalness or providing opportunities for solitude or primitive recreation. *See*, Instruction Memoranda (IMs) 2003-274 and 2003-275. These values should also be identified and protected through these planning processes. BLM should recognize the wide range of values associated with lands with wilderness character:

a. Scenic values – FLPMA specifically identifies "scenic values" as a resource of BLM lands for purposes of inventory and management (43 U.S.C. § 1711(a)), and the unspoiled landscapes of lands with wilderness characteristics generally provide spectacular viewing experiences. The scenic values of these lands will be severely compromised if destructive activities or other visual impairments are permitted.

b. Recreation – FLPMA also identifies "outdoor recreation" as a valuable resource to be inventoried and managed by BLM. 43 U.S.C. § 1711(a). Lands with wilderness characteristics provide opportunities for primitive recreation, such as hiking, camping, hunting and wildlife viewing. Most, if not all primitive recreation experiences will be foreclosed or severely impacted if the naturalness and quiet of these lands are not preserved.

c. Wildlife habitat and riparian areas – FLPMA acknowledges the value of wildlife habitat found in public lands and recognizes habitat as an important use. 43 U.S.C. § 1702(c). Due to their unspoiled state, lands with wilderness characteristics provide valuable habitat for wildlife, thereby supporting additional resources and uses of the public lands. As part of their habitat, many species are also dependent on riparian and other wetland habitats, especially during either seasonal migrations or seasons and years when surrounding habitats are dry and unproductive. Wilderness quality lands support biodiversity, watershed protection and overall healthy ecosystems. The low route density, absence of development activities and corresponding dearth of motorized vehicles, which are integral to wilderness character, also ensure the clean air, clean water and lack of disturbance necessary for productive wildlife habitat and riparian areas (which support both wildlife habitat and human uses of water).

Further, inventorying lands with wilderness characteristics will also provide important data on existing large blocks of habitat and how BLM can restore these blocks of habitat to better match the historic range of variability. Swanson et al. (1994) contend that managing an ecosystem within its range of variability is appropriate to maintain diverse, resilient, productive, and healthy ecosystems for viable populations of native species. Using the historical range of variability, they believe, is the most scientifically defensible way to meet society's objective of sustaining habitat. Patrick Daigle and Rick Dawson, Extension Note 07; Management Concepts for Landscape Ecology (Part 1 of 7). October 1996. http://www.for.gov.bc.ca/hfd/pubs/docs/en/en07.pdf; *citing* Swanson, F. J.; Jones, J. A.; Wallin, D. O.; Cissel, J. H. 1994. Natural variability--implications for ecosystem management. In: Jensen, M. E.; Bourgeron, P. S., tech. eds. Eastside Forest Ecosystem Health Assessment--Volume II: Ecosystem management: principles and applications. Gen. Tech. Rep. PNW-GTR-318. Portland, OR: U.S. Dept. of Agriculture, Forest Service, Pacific Northwest Research Station: pp 89-106.

Identifying, restoring and protecting substantial roadless areas in the Glenwood Springs and Kremmling planning area can provide crucial benefits to wildlife.

d. Cultural resources – FLPMA also recognizes the importance of "historical values" as part of the resources of the public lands to be protected. 43 U.S.C. § 1702(c). The lack of intensive human access and activity on lands with wilderness characteristics helps to protect these resources. There are important areas of overlap between the areas identified as rich in cultural resources and those containing wilderness characteristics, underscoring the added benefits of protecting these lands.

e. Economic benefits – The recreation opportunities provided by wilderness quality lands also yield direct economic benefits to local communities. According to the U.S. Fish & Wildlife Service, in 2001 State residents and non-residents spent $2 billion on wildlife recreation in Colorado. (USFWS 2002, *National Survey of Hunting, Fishing and Wildlife-associated Recreation* - http://www.census.gov/prod/2002pubs/fhw01-co.pdf). In addition, local communities that protect wildlands reap measurable benefits in terms of employment and personal income. For instance, a recent report by the Sonoran Institute (Sonoran Institute 2004, *Prosperity in the 21st Century West -The Role of Protected Public Lands*) found that:

> Protected lands have the greatest influence on economic growth in rural isolated counties that lack easy access to larger markets. From 1970 to 2000, real per capita income in isolated rural counties with protected land grew more than 60 percent faster than isolated counties without any protected lands.

These findings confirm earlier research, showing that wilderness is in fact beneficial for local economies. Residents of counties with wilderness cite wilderness as an important reason why they moved to the county, and long-term residents cite it as a reason they stay. Recent survey results also indicate that many firms decide to locate or stay in the West because of scenic amenities and wildlife-based recreation, both of which are strongly supported by wilderness areas. (Morton 2000, *Wilderness: The Silent Engine of the West's Economy*). Other "non-market" economic values arise from the ability of wildlands to contribute to recreation and recreation-related jobs, scientific research, scenic viewsheds, biodiversity conservation, and watershed protection. (Morton 1999, *The Economic Benefits of Wilderness: Theory and Practice*; Loomis 2000, *Economic Values of Wilderness Recreation and Passive Use: What We Think We Know at the Turn of the 21st Century*). All of these economic benefits are dependent upon adequate protection of the wilderness characteristics of the lands.

f. Quality of life – The wildlands located within the Glenwood Springs and Kremmling planning areas help to define the character of this area and are an important component of the quality of life for local residents and future generations, providing wilderness values in proximity to burgeoning urban and suburban areas such as Glenwood Springs and Kremmling. Their protection enables the customs and culture of this community to continue.

g. Balanced use – The vast majority of BLM lands are open to motorized use and development. FLPMA recognizes that "multiple use" of the public lands requires "a combination of balanced and diverse resource uses" that includes recreation, watershed, wildlife, fish, and natural scenic and historical values (43 U.S.C. § 1702(c)). FLPMA also requires BLM to prepare land use plans that may limit certain uses in some areas (43 U.S.C. § 1712). Many other multiple uses of

public lands are compatible with protection of wilderness characteristics – in fact, many are enhanced if not dependent on protection of wilderness qualities (such as primitive recreation and wildlife habitat). Protection of wilderness characteristics will benefit many of the other multiple uses of BLM lands, while other more exclusionary uses (such as off-road vehicle use and timber harvesting) will still have adequate opportunities on other BLM lands.

2. BLM must consider alternatives for managing lands managed by the RMP to protect their wilderness characteristics.

As discussed above, NEPA requires BLM to "rigorously explore and objectively evaluate" a range of alternatives to proposed federal actions. *See* 40 C.F.R. §§ 1502.14(a) and 1508.25(c).

Given the broad purpose of the preparation of the RMP revisions and the information compiled by the public regarding lands with wilderness characteristics, the range of alternatives for these lands should include alternatives to protect their wilderness values. This range of alternatives is also consistent with BLM's FLPMA obligations to inventory its lands and their resources, "including outdoor recreation and scenic values" (43 U.S.C. § 1711(a)), which by definition includes wilderness character. FLPMA also obligates BLM to take this inventory into account when preparing land use plans, using and observing the principles of multiple use and sustained yield. 43 U.S.C. § 1712(c)(4); 43 U.S.C. § 1712(c)(1). Through management plans, BLM can and should protect wilderness character and the many uses that wilderness character provides on the public lands through various management decisions, including by excluding or limiting certain uses of the public lands. *See*, 43 U.S.C. § 1712(e). This is necessary and consistent with the definition of multiple use, which identifies the importance of various aspects of wilderness character (such as recreation, wildlife, natural scenic values) and requires BLM's consideration of the relative values of these resources but "not necessarily to the combination of uses that will give the greatest economic return." 43 U.S.C. § 1702(c).

a. BLM should consider designating new Wilderness Study Areas.

We are aware of the April 2003 settlement agreement (Utah Settlement) between Secretary of the Interior Norton and the State of Utah (in which BLM abdicated its authority to designate any additional Wilderness Study Areas (WSAs)), and we maintain that this agreement is invalid and will ultimately be overturned in pending litigation.

The federal court in Utah revoked its approval of the Utah Settlement, stating that its approval of the initial settlement was never intended to be interpreted as a binding consent decree. Recognizing that the court's decision undermined the legal ground for the Utah Settlement, the State of Utah and the Department of Interior have now formally withdrawn the settlement as it was originally submitted. *See*, Motion to Stay Briefing and for a Status Conference, September 9, 2005, **attached**. This casts serious doubt upon BLM's current policy not to consider designating new WSAs. Because the State of Utah and the Department of Interior have withdrawn their settlement and do not intend to seek a new consent decree, there is currently no binding consent decree and the BLM has not even issued any updated guidance seeking to continue applying this misguided and illegal policy.

Even if the Utah Settlement is reinstated, not as a consent decree, it is illegal. The Utah Settlement is based on an interpretation of FLPMA §§ 201, 202, and 603 that is contrary to FLPMA's plain language. Section 603 did not supersede or limit BLM's authority under § 201 to undertake wilderness inventories, but rather relies explicitly on BLM having exactly that authority under § 201. Nor did § 603 in any way limit BLM's discretion under § 202 to manage its lands as it sees fit, including managing areas as § 202 WSAs in accordance with the Interim Management Policy (IMP). Every prior administration has created WSAs under § 202 and they plainly had authority to do so. This administration has such authority as well, making this a reasonable alternative deserving of consideration in this NEPA process.

The Utah Settlement is also illegal because the court in Utah lacked jurisdiction to prohibit designation of new WSAs nationwide, including in Colorado.

Recommendation: In light of the most recent ruling and subsequent action of the parties, we emphasize that the BLM can and should continue to designate new WSAs in these planning processes, including the areas identified in the Citizens Wilderness Proposal (submitted under separate cover). Further, if BLM fails to fulfill these obligations, it risks violating both FLPMA and NEPA, and jeopardizing the validity of these entire planning processes.

b. BLM should also consider other management alternatives for protecting lands with wilderness characteristics.

The Utah Settlement does not affect BLM's obligation to value wilderness character or, according to BLM directives, the agency's ability to protect that character, including in the development of management alternatives. In fact, BLM has not only claimed that it can continue to protect wilderness values, but has also committed to doing so. On September 29, 2003, BLM issued IMs 2003-274 and 2003-275, formalizing its policies concerning wilderness study and consideration of wilderness characteristics in the wake of the Utah Settlement. In the IMs and subsequent public statements, BLM has claimed that its abandonment of previous policy on WSAs would not prevent protection of lands with wilderness characteristics. The IMs contemplate that BLM can continue to inventory for and protect land "with wilderness characteristics," such as naturalness or providing opportunities for solitude or primitive recreation, through the planning process. The IMs further provide for management that emphasizes "the protection of some or all of the wilderness characteristics as a priority," even if this means prioritizing wilderness over other multiple uses. This guidance does not limit its application to lands suitable for designation of WSAs; for instance, the guidance does not include a requirement for the lands at issue to generally comprise 5000-acre parcels or a requirement that the lands have all of the potential wilderness characteristics in order to merit protection. IM 2003-274 states that "BLM may continue to inventory public lands for resource or other values, ***including wilderness characteristics***" and that the agency can "***manage them using special protections*** to protect wilderness characteristics." (emphasis added). Further, IM 2003-275, Change 1, reads:

> The BLM can make a ***variety of land use plan decisions*** to protect wilderness characteristics, such as establishing Visual Resource Management (VRM) class objectives to guide the placement of roads, trails, and other facilities; establishing

> conditions of use to be **attached** to permits, leases, and other authorizations to achieve the desired level of resource protection; and designating lands as open, closed, or limited to Off Highway Vehicles (OHV) to achieve a desired visitor experience. (emphasis added).

Accordingly, administrative protection can and should be considered for lands not currently protected. The Draft RMP should also consider management alternatives that provide administrative protection for the wilderness characteristics of those lands currently designated as WSAs if they are not ultimately designated as Wilderness by Congress; their wilderness characteristics are already acknowledged by the BLM.

Courts have confirmed the BLM's obligations to consider the value of wilderness characteristics and the potential impacts of decisions on this resource when making land use planning decisions. In a recent decision, a federal court found that BLM's failure to re-inventory lands for wilderness values and to consider the potential impact of decisions regarding management of a grazing allotment violated its obligations under NEPA and FLPMA, then enjoined any implementation of the decision until the agency reinventoried the lands at issue and prepared an environmental document taking into account the impacts of its decisions on wilderness values. In Oregon Natural Desert Association v. Rasmussen, CV 05-1616-AS, Findings and Recommendations (D.Or. April 20, 2006 – copy **attached**); Order (D.Or. December 12, 2006 – copy **attached**), the Oregon Natural Desert Association (ONDA) had submitted an updated inventory of wilderness values, but BLM declined to "revisit" its previous inventory or to consider the potential damage to wilderness values from the proposed grazing management decisions. The court found that BLM had violated NEPA by failing to consider significant new information on wilderness values and potential impacts on wilderness values, and had also failed to meet its obligations under FLPMA by failing to engage in a continuing inventory of wilderness values. The court concluded:

> The court finds BLM did not meet its obligation under NEPA simply by reviewing and critiquing ONDA's work product. **It was obligated under NEPA to consider whether there were changes in or additions to the wilderness values** within the East-West Gulch, **and whether the proposed action in that area might negatively impact those wilderness values**, if they exist. The court finds BLM did not meet that obligation by relying on the one-time inventory review conducted in 1992. **Such reliance is not consistent with its statutory obligation to engage in a continuing inventory so as to be current on changing conditions and wilderness values**. 43 U.S.C. § 1711(a).
>
> BLM's issuance of the East-West Gulch Projects EA and the accompanying Finding of No Substantial Impact (FONSI) in the absence of current information on wilderness values was arbitrary and capricious, and, therefore, was in violation of NEPA and the APA. (emphasis added)

BLM is similarly obligated to both consider additions to wilderness values and evaluate the potential impacts on those wilderness values from its management decisions.

In the most recent ruling on the Utah Settlement challenge (State of Utah v. Norton, Case No. 2:96-CV-0870, Order and Opinion (D.Utah September 20, 2006)), Judge Benson found against the Conservation Groups for a number of reasons, including agreeing with the legal interpretation of FLPMA put forth by the State of Utah and the BLM (a finding we continue to dispute). However, the ruling also justifies the court's interpretation by finding that the agency can provide virtually the same protection for lands with wilderness characteristics through administrative decisions as it can through designation of new WSAs, with the only material difference being that, while the agency can alter its own management decisions, only Congress can change a WSA designation. The court stated: "Both Utah and the BLM acknowledge that the BLM has the discretion to manage lands in a manner that is **similar to the non-impairment standard** by emphasizing the protection of wilderness characteristics as a priority over other potential uses." Order and Opinion, p. 41 (emphasis added - excerpt **attached**).

In a subsequent briefing to the U.S. Court of Appeals for the 10th Circuit, the Department of the Interior and the BLM reiterated that "the settlement does not preclude BLM from **inventorying public lands for wilderness-associated characteristics**" and that "the land management decision obtained through FLPMA § 202 process may **resemble management under FLPMA § 603's non-impairment standard**." In discussing how BLM will manage lands with wilderness characteristics, the brief refers to the "BLM's discretion under FLPMA § 202 to **preserve their wilderness-associated characteristics**." Brief of the Federal Appellees, State of Utah v. Kempthorne, Case No. 06-4240 (February 26, 2007), pp. 40, 43 (emphases added - excerpt **attached**). Similarly, the Glenwood Springs and Kremmling Field Offices can and should protect lands with wilderness characteristics from the damage likely to result from oil and gas development and uncontrolled ORV use, both of which the BLM has acknowledged are likely to occur if these activities are permitted to occur on lands with wilderness characteristics.

In addition, the information submitted regarding citizen-proposed wilderness constitutes significant new information that must be addressed in this RMP revision. This information has not yet been analyzed in the existing land use plan, so NEPA requires analysis of the potential environmental direct, indirect and cumulative effects of oil and gas development on these areas and consideration of protection for them. *See*, 40 C.F.R. § 1502.9(c); Marsh v. Oregon Natural Resources Council, 490 U.S. 360, 374 (1989). In a recent decision, the U.S. District for the District of Utah found that information regarding wilderness characteristics that was not considered in the existing land use plan was:

> **a textbook example of significant new information** about the affected environment (the **wilderness attributes and characteristics** of the Desolation Canyon, Floy Canyon, Flume Canyon, Coal Canyon, and Flat Tops unit) that would be **impacted by oil and gas development**; information that was **not reflected in BLM's existing NEPA analyses.**

Southern Utah Wilderness Alliance v. Norton, 457 F. Supp. 2d 1253 (D. Utah 2006) (**attached**). A compliant NEPA analysis requires not only assessment of potential impacts but also a consideration of potential mitigation measures, such as protecting lands with wilderness characteristics. 40 C.F.R. §§ 1502.14, 1502.16. The Glenwood Springs and Kremmling RMPs must consider protective measures tailored specifically to protect lands with wilderness characteristics.

BLM's Arizona State Office has recently issued guidance that elaborates upon this guidance by providing for identification of lands with wilderness characteristics and development of management prescriptions to protect and enhance these values (IM No. AZ-2005-007 – **attached** for your reference). Other RMPs that are being prepared in Colorado, Arizona, New Mexico and Utah include identification of lands with wilderness characteristics and include management of certain areas to maintain and enhance these values in management alternatives under consideration. For example, the Draft RMP for the Little Snake Field Office (released February 9, 2007 and available on-line at: http://www.co.blm.gov/lsra/rmp/index.htm) addressed management of lands with wilderness characteristics and/or backcountry characteristics. Most of the lands at issue in the Little Snake Draft RMP were identified as part of a citizens' wilderness proposal, which the BLM re-inventoried and considered for management of their naturalness and/or opportunities for primitive recreation or solitude. The Draft RMP identifies two ***specific management approaches***, one for "Lands with Wilderness Characteristics Outside Existing WSAs" and another for "Lands with Backcountry Characteristics Outside Existing WSAs." *See*, Draft RMP, pp. 2-158 – 2-161; 2-199 – 2-201 (**attached**). Management prescriptions include:

Lands with Wilderness Characteristics:

- Objective: "to protect naturalness, opportunities for semiprimitive recreation and solitude";
- closed to oil and gas operations and other minerals activities;
- off-road vehicles (ORVs) limited to designated routes;
- Class II or Class III Visual Resource Management (VRM) classification; and
- Some areas may be managed as a Special Recreation Management Area (SRMA) to "provide quality primitive recreation experiences in a largely natural setting.":
    - closed to oil and gas leasing (or to new oil and gas leasing);
    - closed to ORVs;
    - VRM Class II.

Lands with Backcountry Characteristics:

- Described as "backcountry areas";
- Objective: "to provide backcountry recreation experience in predominantly natural settings";
- closed oil and gas leasing;
- closed to ORVs; and
- VRM Class II.

The Preliminary Draft Alternatives for the Moab RMP also identify "Lands with or likely to have Wilderness Characteristics" and specifically set out management prescriptions for these lands. The lands at issue are identified from a combination of Utah BLM's 1999 inventory, citizen-proposed wilderness that the BLM made "reasonable probability determinations" for as lands likely to have wilderness characteristics, and additional lands identified by the public during scoping for the RMP. The Moab Field Office evaluated all of this information in order to make determinations that these lands have wilderness characteristics. The management prescriptions for these areas include:

- no surface occupancy stipulations for oil and gas leasing and other surface disturbing activities;

- closing portions of these lands to oil and gas leasing;
- vehicle use is limited to designated roads;
- no land disposals; and
- no new rights-of-way.

To ensure that wilderness values receive proper and sufficient attention as a critical aspect of land management in preparation of the Glenwood Springs and Kremmling RMPs, BLM must address wilderness as a separate and unique issue in the planning process including in its Planning Criteria, in the Analysis of the Management Situation and in each section of the RMPs. Protection of lands with wilderness character should be identified as a major issue in the scoping report. This will assist the public in understanding the values of wilderness-quality lands and the potential effects of other multiple uses on wilderness character, as well as in communicating comments or concerns regarding the management of these lands to BLM. Because comments on protection of wilderness values will be clearly identified, BLM will be in a better position to clarify any misconceptions and provide complete responses.

In preparing the revised RMPs and accompanying EIS, BLM should clearly present management alternatives in the context of protecting wilderness character and analyze environmental consequences to that character. The protection of wilderness character should also be identified as one of the major scoping issues in the RMPs. BLM has been aware of these proposed wilderness areas for some time, and the agency must attend to them. In the "Alternatives" section of the RMPs, BLM must include various ways to protect these lands in each of the management alternatives. In addition to considering designation of new WSAs, BLM should propose protective management prescriptions or other protective status (including mineral withdrawals, non-motorized recreation prescriptions, ACEC designations, and prohibitions on new road construction and erection of structures such as cell towers) for these lands. The Alternatives section must also discuss the implications of each alternative for the wilderness-quality lands governed by the Glenwood Springs and Kremmling RMPs. Finally, BLM must specify the "Environmental Consequences" of the resource management decisions on the wilderness-quality lands in the planning areas. This discussion should include, but not be limited to, an analysis of the cumulative impacts of other activities (including those undertaken by non-federal entities) within the planning areas on these unique lands. In short, in every major section of the RMPs, BLM must address wilderness-quality lands and citizen-proposed wilderness areas. BLM should then take appropriate actions to protect wilderness character in the preferred management alternative.

We look forward to seeing inventory for and protection of wilderness qualities comprehensively addressed as the preparation of the Glenwood Springs and Kremmling RMPs proceed.

Recommendation: BLM should include protection of lands with wilderness characteristics in the RMPs' management alternatives and thoroughly analyze this issue throughout the planning process. To ensure that wilderness values receive proper and sufficient attention as a critical aspect of land management in preparation of the RMPs, BLM must inventory for lands with wilderness characteristics (including those lands identified in the Citizens' Wilderness Proposal), consider alternatives for protecting lands with wilderness characteristics (including for those lands currently designated as WSAs if they are not ultimately designated as Wilderness by

Congress) and address wilderness as a separate and unique issue in the planning process in each section of the RMP, as described above. While we believe BLM has the authority to designate new WSAs as part of this planning process, we understand BLM is currently operating under direction not to do so. As such, BLM should use a combination of ACECs, SRMAs, other designations and specific management prescriptions such as those identified above to protect the wilderness characteristics present in the Glenwood Springs and Kremmling Field Offices. Further, low elevation helicopter flights and landings (such as those being proposed as part of the Colorado Army National Guard High-Altitude Army Aviation Training Site (HAATS)) should not be allowed in areas identified as possessing wilderness characteristics. The HAATS issue has been a serious and long-standing concern for the conservation community, and we believe BLM should preclude low elevation helicopter flights and landings in these areas to ensure the areas retain their wilderness characteristics.

CULTURAL RESOURCES

FLPMA obligates the BLM to protect cultural, geologic, and paleontologic resource values (43 U.S.C. §§ 1701(a)(8) 1702(c)). In the context of historical and cultural resources, the National Historic Preservation Act of 1966 ("NHPA") (16 U.S.C. § 470 et seq.) affords heightened protection to these resources, establishing a cooperative federal-state program for the protection of historic and cultural resources. In particular, the "section 106" (16 U.S.C. § 470f) review process obligates the BLM to consider the effects of management actions on historic and cultural resources listed or eligible for inclusion under NHPA. Additionally, Section 106 requires the BLM to consider the effects of its management actions on all historic resources and to give the Advisory Council on Historic Preservation an opportunity to comment before the BLM takes action. Section 110 of the NHPA requires the BLM to assume responsibility for the preservation of historic properties it owns or controls (16 U.S.C. § 470h-2(a)(1)), and to manage and maintain those resources in a way that gives "special consideration" to preserving their historic, archaeological, and cultural values. Section 110 also requires the BLM to ensure that all historic properties within the National Monument are identified, evaluated, and nominated to the National Register of Historic Places. *Id.* § 470h-2(a)(2)(A).

Further, the President's "Preserve America" initiative (*See* Exec. Order 13287, March 3, 2003) requires the BLM to advance the protection, enhancement, and contemporary use of its historic properties. The BLM must ensure that "the management of historic properties in its ownership is conducted in a manner that promotes the long-term preservation and use of those properties as Federal assets."

Therefore, the Kremmling and Glenwood Springs Field Offices must carefully consider the effects of all RMP decisions on the wealth of archaeological and cultural values located in the planning area. Since it will be difficult to evaluate the effect of decisions when the location of cultural resources is unknown, the BLM should undertake an archaeological inventory wherever necessary. In particular, in regards to travel planning, the BLM should consider where motorized and non-motorized routes are directing people, inventory cultural resources along those routes, and carefully consider the potential impacts to those resources.

Recommendations:

In terms of archeological and historical values:

- BLM's goal should be to protect, conserve, and where appropriate restore archeological and historical sites and landscapes.
- BLM should survey all known or discoverable cultural and historic sites, or those adjacent sites may be adversely affected.
- BLM should determine the sites or areas that are most vulnerable to current and future impact and adopt management actions necessary to protect, conserve, and restore cultural resources.
- BLM should complete a Cultural Resource Management Plan that coordinates with the objectives of the RMPs and seeks to provide for an appropriate proactive process of inventorying for cultural resources, making determinations of eligibility for the National Register, and seeking to nominate eligible properties to the National Register.
- BLM should outline specific management actions, such as stabilization, fencing, signing, closures, or interpretative development, to protect, conserve, and where appropriate restore cultural resources.
- BLM should adopt measures to protect cultural resources from artifact collectors, looters, thieves, and vandals.
- BLM should consult with the Native American community to determine whether there are sites or specific areas of particular concern, including sites of traditional religious and cultural significance.

In terms of geologic and paleontologic resources:

- BLM's goal should be to protect and conserve special geologic formations and paleontologic resources.
- BLM should determine the geologic and paleontologic sites or areas that are most vulnerable to current and future impact and adopt management actions necessary to protect, conserve, and restore these resources.
- BLM should prohibit the collection of any specimens.
- BLM should adopt measures to protect paleontologic resources from looters, thieves, and vandals.
- BLM should define the level of inventory needed to provide a basis for understanding the distribution, comparative importance, and potential uses of paleontologic resources (i.e., relative sensitivity, relative opportunities for interpretive development, relative scientific importance, relative potential for research and education).

TRAVEL MANAGEMENT PLANNING

1. Travel management decisions should be made in the RMPs.

It is our understanding that BLM intends to complete comprehensive travel management, including route designation as part of the RMP processes for the Glenwood Springs and Kremmling Field Offices. We believe this decision is appropriate and is in keeping with BLM direction, policy, and guidance. BLM's internal guidance states that "each RMP will divide planning areas into OHV area designations that are open, limited or closed." IM No. 2004-005;

see also 43 C.F.R. § 8342.2(b). This internal guidance was also incorporated into the updated version of BLM's *Land Use Planning Handbook.* H-1601, Appendix C, Section II.D (Comprehensive Trails and Travel Management). The *Land Use Planning Handbook* states that BLM should:

> Complete a defined travel management network (system of areas, roads and/or trails) during the development of the land use plan, to the extent practical. If it is not practical to define or delineate the travel management network during the land use planning process, a preliminary network must be identified and a process established to select a final travel management network. (emphasis added)

The *Land Use Planning Handbook* (Appendix C, Section II.D) also sets out requirements for travel management at both the land use and implementation planning levels:

- At the land use plan level, BLM must identify areas for use based on program goals and objectives, primary users, reason for "allowing travel" into an area, setting character to be maintained (including Visual Resource Management and Recreation Opportunity Spectrum classifications), and primary means of travel appropriate to meet objectives and keep setting character; and
- At the implementation level, BLM must define a detailed travel management network, "establish a process" to identify roads, trails, etc. with criteria for selections, guidelines for management, monitoring and maintenance, and indicators for future plan maintenance.

Further, the Colorado BLM has issued IM CO-2007-020, which identifies implementing comprehensive travel management as a "high priority" for the BLM. This IM also notes that the agency is "moving towards a system of limiting use to designated roads" and "not encouraging extensive cross-country travel." As a result, in Colorado, the BLM is now expected to "include a system of designated routes" in RMPs and, where designations cannot be completed for an entire planning area, this directive specifically encourages designating as many areas as possible and prioritizing sub-regions. We would also note that this directive emphasizes that travel management should address "all resource aspects" and modes and conditions of travel, and specifically mentions non-motorized recreation.

Recommendations: We urge BLM not to back away from its stated goal of completing travel management concurrently with the RMP processes and to seize the opportunity presented by this RMP process to complete comprehensive travel management plans in conjunction with these RMPs. At a minimum, BLM should complete travel plans for sensitive areas, such as ACECs, special recreation management areas and citizen-proposed wilderness. Priorities for sub-regions to receive comprehensive travel management planning are identified in the Draft RMP recently issued by the Little Snake Field Office (available on-line at: http://www.co.blm.gov/lsra/rmp/index.htm) and we would encourage you to prioritize areas in this manner as well. Please see Appendix F from the Little Snake Draft RMP, which sets out criteria for prioritizing areas to receive comprehensive travel management planning, including:

- Special management areas
- Areas identified as "limited to designated roads and trails"
- Areas that meet fragile soil criteria

- User and resource conflicts
- Excessive complaints
- Wildlife/wild horse population trends
- Evidence of trail/road proliferation
- Areas with high road densities
- Impacts on cultural resources
- Unacceptable erosion
- Degradation of water quality
- Impacts on visual resources
- Loss of trail integrity
- Habitat fragmentation and damage
- Impacts on sensitive plants
- Need to provide a variety of user experiences

If the agency does not complete travel management plans for all of the planning areas as part of the RMPs, then these RMPs must identify not only areas for use, but also reasons for permitting travel into an area and appropriate criteria for determining routes that will be made available for different uses, taking into account such factors as undeveloped recreation opportunities available and natural settings.

2. Landscape level planning.

Travel planning requires the agency to manage human travel across the landscape. The land use planning process, which addresses the broader landscape within a planning area, provides one of the best opportunities to make travel planning decisions in the appropriate context. While we understand that BLM does not have authority to close or relocate highways, major roads, or County roads, BLM must include these routes when analyzing the transportation network as they have a great impact on habitat fragmentation and reduction in core area size (discussed in length later in these comments and in Appendix 1). The placement and design of travel routes defines which areas will remain or become roadless, and which areas will be disturbed and how. In other words, route decisions determine the fragmentation of the landscape, and, thus, how naturally or unnaturally a landscape will behave in terms of water flow and quality, wildlife migration, and species composition and function.

As mentioned throughout these comments, NEPA requires federal agencies to assess the direct, indirect and cumulative environmental impacts of proposed actions, taking a "hard look" at environmental consequences and performing an analysis commensurate with the scale of the action at issue. 42 U.S.C. § 4321 et seq; 40 C.F.R. § 1508.8.[6] Travel planning affects the entire landscape and can only be thoroughly and properly assessed by considering potential impacts and making decisions at a comparable level. In terms of how to evaluate the potential impacts of travel management decisions, NEPA's definition of "cumulative impact" is instructive:

> the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of

[6] *See also* Metcalf v. Daley, 214 F.3d 1135, 1151 (9th Cir. 2000); Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 348 (1989).

> what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

40 C.F.R. § 1508.7. (emphasis added). BLM must account for the direct, indirect, and cumulative impacts of all roads in the planning area when completing a comprehensive travel management plan.

Recommendation: BLM should address travel management on a landscape-wide basis by addressing the impacts of all roads in the planning area and accounting for the landscape-wide impacts of these roads.

3. Legal definition of "Road."

BLM must apply a legal definition of "road" within the planning process, develop appropriate criteria to accurately gauge what is or is not a road, ensure that illegal "ghost roads" are not legitimized, and in fact, close and reclaim such "ghost roads." Some legal roads serve important travel needs and are appropriate for motorized use. However, routes that are not "roads" should not receive equal consideration. The agency has a definition of "road," and this definition should be adopted and used consistently in order to create a regular expectation and approach on BLM lands. We note however, that merely meeting the definition of a road is not sufficient to justify designating a route. In fact, the BLM must still consider whether a route has negative impacts to sensitive or protected resources, such as by the process recommended in this document, and should only designate those that do not impact these resources.

The legal definition of road for the BLM public lands is derived from the definition of "roadless" in the legislative history of FLPMA:

> The word "roadless" refers to the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road. (H.R. Rep. No. 94-1163 at 17 (1976)).

In addition, the Code of Federal Regulations (43 C.F.R. § 19.2(e)) establishes the following definition:

> An improved road that is suitable for public travel by means of four wheeled, motorized vehicles intended primarily for highway use.

IM 2006-173 ("Implementation of Roads and Trails Terminology Report"), which sets out and defines associated with transportation management, also includes a definition of a road as:

> A linear route declared a road by the owner, managed for use by low-clearance vehicles having four or more wheels, and maintained for regular and continuous use.

Therefore, it is incumbent upon BLM to exclude "user created" routes from the inventory presented in the Draft RMPs. To include these routes is to legitimize and "grandfather in"

illegally created routes and/or routes which have not been improved or maintained by mechanical means to ensure regular use. While BLM may benefit from obtaining input on areas that groups believe would be appropriate for their use, any inventory or proposal of routes to be included in the transportation system for the Glenwood Springs and Kremmling Field Offices should exclude user-created routes.

***Recommendations*:** BLM should use a legal definition of "road" (as defined above) when designating routes and exclude "user created" routes from the inventory.

4. Mapping of routes.

As part of comprehensive travel management planning, we anticipate that BLM will produce route maps to illustrate a base travel network, to generate various route designation proposals, and for purposes of receiving public comments. In these contexts, it is vital that the agency clearly mark on all maps or proposed maps areas with existing restrictions on motorized use, such as: wilderness areas, WSAs, current primitive non-motorized designations, Wild and Scenic Rivers, and ACECs. Depicting existing restrictions will ensure that public comments are informed by the knowledge that additional routes will not be permitted in certain areas. Further, maps should indicate resources that could be affected by motorized use, such as wilderness characteristics and wildlife habitat. Public comments will then be informed by the potential resource conflicts and the best opportunities for designating areas for non-motorized recreation.

***Recommendations*:** BLM should identify both existing restrictions on motorized access and other areas that can be damaged by motorized use on all maps used in travel planning.

5. Habitat fragmentation.

As mentioned in the beginning of this section of our comments, BLM must address travel management on a landscape level to ensure that BLM meets its responsibility as stewards of the public land and mitigates against habitat fragmentation. We have included The Wilderness Society's most recent Science and Policy Brief, "Habitat Fragmentation from Roads: Travel Planning Methods to Safeguard BLM Lands" (Appendix 1). Also included in Appendix 1 are four scientific reports prepared by TWS and discussed in the habitat fragmentation report. These include *Fragmenting Our Lands: The Ecological Footprint From Oil and Gas Development, Protecting Northern Arizona's National Monuments: The Challenge of Transportation Management, Wildlife at a Crossroads: Energy Development in Western Wyoming,* and *Ecological Effects of a Transportation Network on Wildlife.* In addition to summarizing the four reports included, "Habitat Fragmentation from Roads: Travel Planning Methods to Safeguard BLM Lands" provides a summary of available scholarly and government reports and studies on the impact of habitat fragmentation on wildlife, provides methods for calculating habitat fragmentation, and provides recommendations on how to integrate fragmentation analysis into travel management.

We also recommend you look at the travel planning criteria set out in the Record of Decision for the Dillon (MT) RMP (relevant sections **attached** and also available on-line at: http://www.mt.blm.gov/dfo/rod/contents.htm), as an example of criteria that incorporate key aspects of BLM's ORV regulations as well as ecological metrics. While this field office did not complete a comprehensive travel management plan as part of its RMP revision, it included road

density targets and included an appendix outlining the principles it will use when completing a comprehensive travel management plan during implementation.

Recommendation: BLM should use the information provided in Appendix 1 to measure habitat fragmentation, conduct a thorough fragmentation analysis, and inform decisions regarding road closure and other limitations on use in the Glenwood Springs and Kremmling RMPs.

6. Principles of travel management.

When completing a comprehensive travel management plan, it is vital to complete it in a systematic and transparent manner.

Key principles of travel planning

(1) Travel management is part of land use planning and should address both recreation and transportation needs from a landscape perspective.

(2) Prior to conducting an inventory or designation of routes, BLM should assess the present resources, requirements for protection, and which uses for recreation and development are compatible with these resources, requirements and other users.

(3) BLM should use a legal definition of "road" when designating routes.

(4) BLM's consideration of ORV use should take into account its potential damage to resources and other uses, including exclusion of other users.

(5) Where BLM presents a baseline travel system, it must present route maps in a responsible manner that does not legitimize illegally-created routes.

(6) BLM should include a detailed closure and restoration schedule in the plan.

(7) BLM should include and implement a monitoring plan.

(8) BLM should include and implement education and outreach in the plan.

(9) BLM should develop alternatives that incorporate the agency's ability to implement, monitor and enforce designated routes and areas in light of current budget trends.

The Wilderness Society and the Colorado Mountain Club have developed a template for conducting travel management planning, including a detailed discussion of these key principles of travel planning, which we have **attached** and recommend that the BLM incorporate into the RMPs as the process for further planning.

Recommendations: BLM should follow the nine travel planning principles listed above to ensure that only routes which truly serve a valid purpose for the public remain open. In addition, the BLM should conduct travel planning in accordance with the template provided with these comments.

WILD AND SCENIC RIVERS

The Wilderness Society and the Wilderness Workshop submitted comments on the Wild and Scenic River Eligibility Study (**attached**). BLM released its eligibility determinations for all

streams and rivers in this two field office planning area in March 2007. BLM must now determine whether eligible rivers are suitable for designation, and in making this determination, BLM must demonstrate that any barriers to designation are real and reasonably foreseeable, not theoretical or unsubstantiated. Rivers deemed eligible for inclusion in the Wild and Scenic Rivers System must be managed to protect their values until the suitability determination is made, and suitable rivers must be managed so as to protect their qualities until Congress has an opportunity to designate the river as part of the System. Given that water is the "lifeblood of the West" and that riparian areas are scarce but of tremendous value, BLM should fully protect these priceless resources via the Wild and Scenic Rivers Act and the Glenwood Springs and Kremmling RMPs.

Recommendation: The Glenwood Springs and Kremmling RMPs must adopt requirements to ensure eligible and suitable rivers are protected pending decisions on their designation, and ensure any designated rivers and river corridors are managed to preserve their values.

FIRE

The Glenwood Springs and Kremmling RMPs should establish an ecologically-based fire restoration program, so that fire can play its natural and necessary role in the planning area, such that the fire policy will:

- Focus fire suppression efforts and risk reduction management on the wildland-urban interface.
- Ecological restoration will require prioritization to allocate limited agency funding. We recommend that BLM determine restoration priorities by using communities as the anchor for setting a restoration agenda and then expanding outward from those communities as funding permits.
- Strongly regulate and/or prohibit mechanical vegetation treatments, road building, and other fire management activities in roadless areas and other areas with sensitive resources. The Glenwood Springs and Kremmling RMPs must contain provisions that will ensure that any temporary roads constructed to implement fire policy are in fact temporary.
- Be consistent with the 2001 Western Governor's Association's 10-year Comprehensive Wildfire Strategy.
- Fully comply with all existing legal requirements and obligations, including those arising under NEPA and the Endangered Species Act.

Recommendation: BLM should fully explain and incorporate answers to the following with respect to management of the use of fire in these RMPs:

a) how it intends to comply with applicable laws and regulations;
b) how it will incorporate travel management into its fire plan; and
c) how the suppression criteria will take into account sensitive species habitat and roadless areas.

LAND TENURE DECISIONS

Land tenure decisions will be an important element of the Glenwood Springs and Kremmling RMPs and future decisions will require special consideration. Previously, land tenure decisions may have been made with an eye towards disposing of public land to allow for growth and development given the considerably smaller population of the area. However, given present circumstances, BLM should review the previous plans and decisions and look at future land tenure decisions with an eye towards providing adequate open space for the growing public, maintaining key viewsheds and taking into consideration new proposals for open space and trails and special management areas. Section 102(a)(1) of FLPMA requires that BLM-managed lands be retained in federal ownership unless BLM determines through the land use planning process that disposal of a particular parcel will serve the national interest. 43 U.S.C. 1701. Land tenure decisions must achieve the goals, standards, and objectives outlined in the land use plan.

Along with the growing population of the major population centers within the planning areas has come a desire to develop more land, some of which may be appropriate. However, the BLM must retain land near sensitive and ecologically important areas, including those within existing or proposed ACECs or other special management areas, and including specifically those lands identified in our Special Management Areas proposal. Lands identified in new citizen proposals for open space and special management areas that include lands not owned by BLM should be given priority for acquisition.

Given the current population trends within the region, BLM should reconsider all previous decisions for disposal of public lands and re-evaluate whether or not those decisions still meet the needs of the public. As the agency moves forward it will be crucial that consideration be given to providing adequate open space and trails on public lands. Furthermore, as local entities are in the process of developing plans for such uses, the relationship between the RMPs and these plans will be important, since BLM's decisions can affect local open space, parks and trail plans. Now is the time to take the appropriate steps to plan for the future, otherwise the agency and the public will be forced to make decisions at a time when it may be too late or impossible to provide adequate parks, open space and trails.

Recommendations: The BLM should work with local governments and Tribes when identifying areas where disposal of public lands may be appropriate. However, BLM should identify areas such as ACECs, citizen wilderness proposals, or sensitive species habitat for retention and/or acquisition.

CLAIMS UNDER REVISED STATUTE 2477 (R.S. 2477)

As discussed above, BLM's Land Use Planning Handbook (H-1601-1) and the Executive Orders and federal regulations cited therein obligate the BLM to make travel management decisions, including, for instance, limiting use of ORVs to areas and routes where they will not damage natural resources or cause excessive conflicts with other users of the public lands. The regulations further require BLM to close routes or areas where ORVs are having considerable adverse impacts on other natural resources. 43 C.F.R. § 8341.2. Assertions of R.S. 2477 rights-of-way should not affect this decision-making process.

Instruction Memorandum (IM) 2006-159, which addresses non-binding determinations that may be made by field or state offices, is very clear that there is no requirement for the agency to conduct a non-binding determination as part of travel planning in general or even in relation to specific road closures. Further, as noted in the guidance and by the Tenth Circuit Court of Appeals, the BLM cannot make determinations as to the validity of R.S. 2477 claims – only a court can make a final determination.[7] The IBLA has recently confirmed that BLM is legally permitted to complete transportation plans for areas without addressing R.S. 2477 claims[8]. Where there is a valid R.S. 2477 claim, BLM still has the authority to manage the claim to ensure its compliance with environmental and other laws.

The Glenwood Springs and Kremmling RMPs will not affect valid existing rights, so if an R.S. 2477 right-of-way is ultimately found to exist, decisions in the RMP will be adjusted accordingly. In the interim, BLM should not make decisions recognizing R.S. 2477 rights-of-way as part of the resource management planning process. Alternative avenues exist – namely the federal courts – for those seeking recognition of R.S. 2477 rights and rights-of-way can be obtained under FLPMA for those seeking access.

Recommendation: BLM should neither make determinations regarding R.S. 2477 claims as part of this planning process nor permit those assertions to influence its decisions regarding permitting motorized use.

RECREATION AND SPECIAL RECREATION MANAGEMENT AREAS (SRMAS)

The recreation resource on public lands is becoming increasingly valuable: more people want to recreate on a finite amount of public land. Many recreationists desire solitude, clean air, clean water, vast undeveloped landscapes, and a place to witness healthy, natural systems thriving with native plants and wildlife. The Glenwood Springs and Kremmling RMPs should accommodate those desires.

In order to ensure the continued viability of these desired experiences, the BLM must manage public lands under the Recreation Opportunity Spectrum (ROS). Increasing recreation pressure dictates the need to include more lands within ROS classes that protect the land's undeveloped, wild character, i.e. primitive and semi-primitive non-motorized recreation classes. These designations allow for multiple activities of the sorts most desired by the public: camping, picnicking, hiking, climbing, enjoying scenery, wildlife or natural features viewing, nature study, photography, spelunking, hunting (big game, small game, upland birds, waterfowl), swimming, fishing, and non-motorized river running. All lands within WSAs and lands with wilderness characteristics, should be managed as ROS class primitive, while other spectacular and important

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[7] Southern Utah Wilderness Alliance v. Bureau of Land Management, 425 F.3d 735, 757 (10th Cir.2005)

[8] *See* Rainer Huck, 168 IBLA 365, 398-99 (April 18, 2006) ("BLM did not need to decide the validity of the R.S. 2477 assertions in order to make its route designations, especially since it did not intend its analysis to affect any R.S. 2477 validity determinations and indicated that the Plan would be adjusted to reflect any R.S. 2477 decisions."). The IBLA further declined to adopt the appellants' suggestion that "the Department must engage in a 10-year quest to inventory routes OHV users may have carved out of the public lands by virtue of repetitive use" as part of land management planning, particularly where claimants submitted little or no evidence. 168 IBLA at 399 n.17.

lands in the Glenwood Springs and Kremmling planning area, such as important wildlife habitat, special recreation management areas and ACECs should be managed as ROS primitive or semi-primitive, non-motorized.

The Land Use Planning Handbook (in Appendix C and as further defined in the Glossary) provides for BLM to establish special recreation management areas (SRMAs) in the lands governed by the RMP. Depending upon the anticipated use of each SRMA, BLM should adopt different management strategies. The Handbook identifies the following general types of recreational use:

- **Undeveloped** – These areas are managed to support dispersed recreation, maintaining their highly-valued, distinctive, undeveloped recreation setting character. Within the bounds of legal requirements and sound management practices, resource and visitor management actions exercise minimal regulatory constraint and exclude major investments in facilities and visitor assistance to preserve the visitor's freedom to choose where to go and what to do. Niches served by these high visibility areas may be comprised of national, regional, community, and/or local markets. Here the emphasis is on accommodating use and enjoyment, but prohibiting the kinds of recreation use, project, and other facility developments that would change the areas' distinctive open space setting character.
- **Community** – These areas adjoin communities and are managed to provide structured recreation opportunities in response to recreation-tourism demand generated by community and/or tourism growth and development. The areas are managed to maintain natural resource and/or community setting character, with appropriate restrictions on marketing, administration and other management actions. Major investments in facilities and visitor assistance are authorized in these areas. Here the emphasis is on meeting community, resident, and guest demand for open-space recreation opportunities and the stabilization of recreation-tourism industry and area economies through shoulder-season product development and promotion.
- **Destination** – These areas have distinctive, highly visible, or otherwise outstanding resource attractions that are managed to provide structured recreation opportunities in response to demonstrated national or regional recreation-tourism demand. The areas are managed to maintain natural resource and/or community setting character, with appropriate restrictions on marketing, administration and other management actions. Major investments in facilities and visitor assistance are authorized in these areas. Niches served by these prominent areas are comprised of national and regional recreation-tourism markets. Here the emphasis is on meeting demand for specific activity, experience, and benefit opportunities provided through these superlative natural and cultural settings.

BLM has recently issued a directive for implementation of its Unified Strategy on Recreation and the Colorado BLM is in the process of completing its own Recreation and Visitors Strategy. The agency has recognized the importance of identifying and providing quality recreation experiences on our public lands and we urge the BLM to identify quality, non-motorized recreation opportunities and commit to providing them in these RMPs.

Recommendation: BLM should make use of SRMA designation (including designating those SRMA proposals submitted separately by several of the groups submitting these comments) and ROS classification to support appropriate use of natural resources in the Glenwood Springs and Kremmling planning areas, preserving their special character while permitting local communities to receive the resulting economic benefits.

VISUAL RESOURCES

It is BLM policy that visual resource management (VRM) classes are assigned to all public lands as part of the Record of Decision for RMPs. The objective of this policy is to "manage public lands in a manner which will protect the quality of the scenic (visual) values of these lands." BLM Manual MS-8400.02. Under the authority of FLPMA, the BLM must prepare and maintain on a continuing basis an inventory of visual values for each RMP effort. 43 U.S.C. § 1701; BLM Manual MS-8400.06. In addition, NEPA requires that measures be taken to " . . . assure for all Americans . . . aesthetically pleasing surroundings." Once established, VRM objectives are as binding as any other resource objectives, and no action may be taken unless the VRM objectives can be met. *See* IBLA 98-144, 98-168, 98-207 (1998). The RMPs must make clear that compliance with VRM classes is not discretionary.

BLM should ensure that scenic value is a resource that is conserved and must establish clear management direction describing areas inventoried and possessing high scenic importance with clearly defined objectives that limit surface disturbance within important viewsheds, including:

1. Lands proposed for wilderness designation or with wilderness characteristics should be managed as Class I to "preserve the existing character of the landscape."
2. Lands within popular and easily accessible vantage points should be managed for visual resources, such as VRM Class II to "retain the existing character of the landscape," including clear provisions dealing with oil and gas development and other human disturbance.
3. ACECs and other special management designations and prescriptions should be used to protect scenic landscapes and lookout points within the resource area with stipulations specifically addressing and managing human development impacts, including VRM Class I to "preserve the existing character of the landscape" or VRM Class II to "retain the existing character of the landscape" as appropriate.

Recommendation: BLM must inventory for visual resources and designate all lands within the Glenwood Springs and Kremmling Field Offices with the appropriate VRM classification, as well as enforce these classifications during implementation.

WATER QUALITY

BLM should proactively manage both the quality and quantity of water resources. FLPMA establishes a general requirement that land use planning and the resulting plan provide for compliance with "pollution control laws." 43 U.S.C. § 1712(c)(8). Compliance with the Clean Water Act (CWA) is an important element of this requirement.

The CWA establishes many requirements that BLM must adhere to in the RMP process. It is imperative that BLM insure that waters on its lands comply with State water quality standards. It is critical to recognize that State water quality standards "serve the purposes" of the CWA, which, among other things, is to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters. . ." 33 U.S.C. §§ 1313(c)(2)(A), §1251(a). That is, a purpose of water quality standards is to protect aquatic ecosystems, and BLM must ensure this comprehensive objective is met by ensuring water quality standards are complied with. Water quality standards are typically composed of numeric standards, narrative standards, designated uses, and an antidegradation policy. All too often, however, only numeric standards are viewed as "water quality standards." That narrow view is incorrect. The Supreme Court held in PUD No. 1 of Jefferson County v. Washington Dep't of Ecology, 511 U.S. 700 (1994), that all components of water quality standards are enforceable limits. Consequently, the RMPs must ensure all components of State water quality standards are met, not just numeric standards.

Adopting this legally sanctioned view of water quality standards is important. For example, a typical designated use for a stream might state that the stream is "protected for cold water species of game fish and other cold water aquatic life, including necessary organisms in their food chain." Designated uses of this sort encompass a far more holistic, ecosystem-based view than focusing on, say, the concentration of chloride in the stream (a numeric standard). Consequently, the Glenwood Springs and Kremmling Field Offices RMPs should provide that designated uses be fully achieved, and if they are not, require prompt management changes even if numeric standards are otherwise being met. Similarly, narrative standards can often embody a better ecological synthesis than numeric standards, and thus BLM should ensure that they too are achieved. For example, a State's narrative standard might make it illegal to contaminate a stream with "floating materials or scum that create objectionable odors or cause undesirable aquatic plant growth." If the State water quality standards applicable to the these RMP areas have made narrative provisions a component of water quality standards, the RMPs should ensure these narrative standards are fully met, and modify management where they are not. In meeting the narrative provisions and designated uses of applicable water quality standards, the Glenwood Springs and Kremmling RMPs should clearly establish current conditions in the affected environment, goals, objectives and monitoring protocols for this and every watershed within the lands governed by the Glenwood Springs and Kremmling RMPs.

The State's antidegradation policy is also a critical component of water quality standards. *See* 40 C.F.R. § 131.12 and applicable State regulations. Of particular significance are Outstanding National Resource waters, where water quality must be maintained and protected. 40 C.F.R. §131.12(a)(3). Outstanding National Resource waters are waters that "constitute an outstanding National resource, such as waters of National and State parks and wildlife refuges and waters of exceptional recreational or ecological significance . . ." *Id.* (emphasis added). While States designate Outstanding National Resource waters, the Clean Water Action Plan makes it appropriate for BLM to identify waters that should be fully protected by this designation during its planning process, and to make recommendations to the State and EPA accordingly.

In addition to the antidegradation policy's protections for waters that are meeting water quality standards, where State water quality standards have not been achieved despite implementation of point source pollution controls, section 303(d) of the CWA requires a State to develop a list of

those still-impaired waters, with a priority ranking, and to set total maximum daily loads (TMDLs) of pollutants for the stream "at a level necessary to implement the applicable water quality standards. . . ." 33 U.S.C. §1313(d)(1)(C). Consequently, to the extent waters within the BLM's jurisdiction have been identified as water quality impaired segments, or contribute stream flow to such segments, the Glenwood Springs and Kremmling RMPs should include affirmative steps toward reducing that impaired status, regardless of whether the State has made a specific allocation of pollutant load to BLM lands at the time the these RMPs are prepared. If any specific load allocation has been made by the State for activities on BLM lands, BLM should obviously ensure that all activities are in compliance.

The Glenwood Springs and Kremmling RMPs should also ensure full compliance with sections 401 and 404 of the CWA. Section 401 requires State certification of compliance with State water quality standards prior to authorization of certain actions on BLM lands. 33 U.S.C. § 1341. These RMPs should fully implement this requirement. Section 404 requires permits before discharges of dredged or fill material can be made into navigable waters, and BLM, through the Glenwood Springs and Kremmling RMPs, should assist the EPA and Army Corps of Engineers with implementation and enforcement of this requirement, which, of course, is a powerful means for the protection of wetlands. See 33 U.S.C. § 1344.

Similarly, the RMPs should make provision for implementing BLM's Riparian-Wetland Initiative, and seek to implement the specific objectives established in that initiative, particularly the objective of restoring 75% of riparian areas to "proper functioning condition."

Recommendation: We urge the BLM to obtain sufficient information regarding water resources in the area governed by the Glenwood Springs and Kremmling RMPs and take this into account in developing management alternatives that include appropriate protections for this irreplaceable resource, as described in more detail above.

AIR QUALITY

It is our understanding that BLM is completing air quality modeling for the Glenwood Springs, Kremmling, Little Snake, and White River Field Offices. As part of this model, BLM should prepare an Air Quality Baseline and Analysis Report, to be incorporated as the baseline air quality of the EIS, and set air quality goals and objectives aimed at improving air quality both regionally and throughout the planning area. Given the amount of oil and gas activity projected in northwest Colorado, a comprehensive model is necessary.

The Glenwood Springs and Kremmling RMPs should seek to exceed local, State and Federal air quality standards, including meeting the requirements of applicable State implementation plans and ambient air quality standards and improving air quality in non-attainment areas. Protecting air quality should be a priority – not just an afterthought that is done if convenient or "feasible." FLPMA requires BLM to consider the relative value of the various resources, and clean air is quickly becoming (along with undeveloped landscapes) a most valued, yet dwindling resource. Therefore, BLM should take a proactive approach to managing air quality by, among other things: gathering baseline air quality data; setting aggressive standards; requiring any actions on public lands to meet those standards (i.e. no flaring, no two-stroke engine use on public lands,

etc); analyzing the cumulative impact of any proposed action with other past, present, and reasonably foreseeable actions; establishing an effective monitoring program; and halting any actions that contribute to air pollution if such monitoring reveals that standards have been exceeded.

The EIS should address the issue of regional haze and the destruction of viewsheds caused by haze (which may be caused by activities both within and outside the lands governed by the Glenwood Springs and Kremmling RMPs, but is a necessary part of cumulative impact analysis). Air pollution problems, perhaps more than any other environmental problem, are not subject to human-created, artificial boundaries. These RMPs should address the requirements in the Clean Air Act for the prevention of significant deterioration of air quality and protection of air quality in various airshed categories, particularly in Class I airsheds applicable to National Parks and wilderness areas. The EIS should address how prevention of significant deterioration requirements can be met, and the RMPs should require steps to ensure they are met.

Oil and gas development activities directly contribute to air pollution in several ways, and all should be addressed in the EIS. Oil and gas development activities produce large surface disturbances (pads and roads) and increase vehicle traffic, which contributes to particulate pollution. Oil and gas development activities also contribute to NO_x, SO_2, and volatile organic compound (VOCs) pollution, through activities like flaring, drilling, processing plants, and wellhead compressors and compressor stations, to name a few. It is extremely important to consider the effects of and impose appropriate controls on air pollution from oil and gas development activities in the Glenwood Springs and Kremmling RMPs.

Recommendations: The EIS must consider air pollution problems existing in the planning areas (whatever their source) at appropriately broad scales. Moreover, the preparation of a baseline air quality and analysis report will guide local communities and BLM in understanding air quality impacts associated with future development and mitigation measures.

NOISE

Remoteness and quiet are major reasons people seek out the public lands, and the Glenwood Springs and Kremmling RMPs should make provisions to ensure that lands in the planning areas remain remote and quiet. In addition, as noted in the literature provided on habitat fragmentation, noise also affects the ability of wildlife to use habitat Where a lack of noise is an important part of the experience of public lands or needed for protection of wildlife, such as in ACECs, primitive recreation SRMAs or critical habitat, the RMPs should carefully regulate and limit the noise from oil and gas compressors and compressor stations, and that resulting from exploration and well drilling. In addition, the Glenwood Springs and Kremmling RMPs must regulate and limit noise from ORVs.

Recommendation: The Glenwood Springs and Kremmling RMPs should identify noise as a potential impact of various activities and impose appropriate restrictions on those activities to protect recreation opportunities and wildlife habitat.

RECOMMENDATIONS FOR CONDUCTING SOCIOECONOMIC ANALYSIS

The analysis of the socio-economic impacts of the proposed resource management plan must be thorough and accurate in order to responsibly manage the public lands. We have **attached** a document entitled "**Socio-Economic Framework for Public Land Management Planning: Indicators for the West's Economy**," which details our expectations for the baseline analysis of the region's economy as well as the analysis of the potential impacts of proposed management alternatives on the area. We request that your analysis of alternatives in the Glenwood Springs and Kremmling RMP revisions follow the approach set out in this document, as well as the more specific considerations detailed below.

1. General approach.

In general, when looking at the economic implications of various management alternatives, BLM should do a full accounting of the costs and benefits. To facilitate informed investment decisions about publicly owned wildlands, economic analysis must take into consideration both market and nonmarket benefits and costs (Loomis 1993). To account for the full array of market and nonmarket wildland benefits, economists have derived the total economic valuation framework (TEV). TEV is the appropriate measure to use generally when evaluating the benefits of conserving wilderness character and wildlands. Figure 1 summarizes the seven categories of wildland benefits (Morton, 1999).

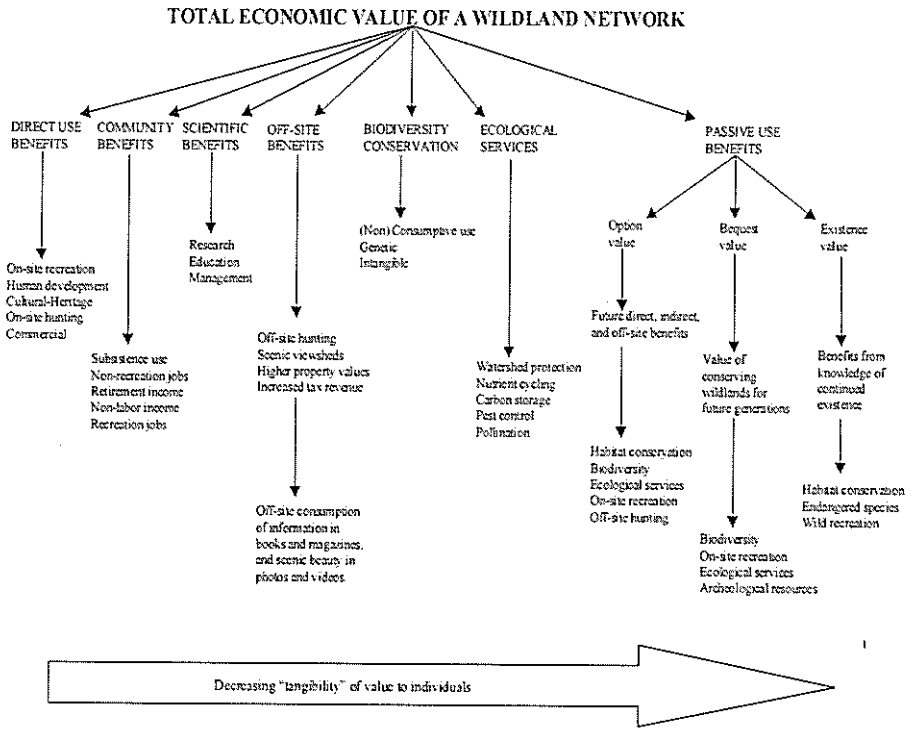

Figure 1. Total Economic Valuation Framework for Wildlands

Source: Morton, 1999

With respect to estimating the economic impacts (e.g. income to communities) of various management alternatives, the BLM should avoid the IMPLAN model or other input-output models that are grounded in economic base theory, as research has shown that IMPLAN is a static model that is inadequate for planning purposes. IMPLAN models also do not consider the impacts of many important variables that affect regional growth in the rural west, such as regional amenities like high quality hunting, fishing and recreational opportunities, open space, scenic beauty, clean air and clean water, a sense of community, and our overall high quality of life. Many of these amenities are associated with attracting new migrants as well as retaining long-time residents -- both of whom earn retirement and investment income. Unfortunately, most IMPLAN models completely fail to consider the important economic role of retirement and investment in the economy of a community – which can be a fatal flaw of the model. We recommend that the BLM rely on trend analysis of income and employment for the counties impacted using the EPS system developed by the Sonoran Institute (www.sonoran.org). We have **attached** an aggregate profile for the entire 10-county area.

2. The BLM should use Total Personal Income as a basis for examining economic impacts.

For the analysis of regional economic trends, the BLM should include an analysis of all sources of income, rather than relying solely on employment – which will dramatically overstate the importance of oil and gas industries to the local economy. A full accounting of income is necessary to an understanding of the important role that transfer payments and other sources of non-labor income, such as interest payments, rents, and profits have upon the regional economy. For example, in Colorado, investment and retirement income accounts for 23% of total personal income in the state. Therefore, an economic impact analysis that excludes non-labor income is totally inadequate and misleading.

3. To provide socio-economic context, the BLM should examine historic trends in county income and employment.

A growing number of economists are recognizing that protecting the quality of the natural environment is key in attracting new residents and business and therefore the environment is the engine propelling the regional economy. A letter to President Bush from 100 economists concludes "The West's natural environment is, arguably, its greatest, long-run economic strength…A community's ability to retain and attract workers and firms now drives it prosperity. But if a community's natural environment is degraded, it has greater difficult retaining and attracting workers and firms" (Whitelaw, et al. 2003). Given these findings, we request that the BLM economists fully consider the indirect role of wildlands in attracting non-recreational businesses and retirees when considering the economic impacts of the proposed natural gas development project. Research supports these assertions that the amenities of the rural West attract business and economic opportunities (Lorah, 2001; Rasker, 1994; Johnson and Rasker, 1993 and 1995; Rudzitis and Johansen, 1989 and 1991)

Completing an analysis of income and employment trends and the role of wildlands in those trends is especially relevant given the growing body of literature suggesting that the future diversification of rural economies is dependent on the ecological and amenity services provided by public lands in the west (Power 1996, Johnson and Rasker 1995, Haynes and Horne 1997). These services (e.g. watershed protection, wildlife habitat, and scenic vistas) improve the quality of life, which in turn attracts new businesses and capital to rural communities.

Public lands in the West represent natural assets that provide communities with a comparative advantage over other rural areas in diversifying their economies. Public land management can contribute to decreasing dependence/specialization and diversifying local economies by de-emphasizing resource extraction and emphasizing management and budgets on providing high-quality recreation and conserving habitat for the region's biological resources.

As noted by (Freudenburg and Gramling 1994):

> it needs to be recognized as a serious empirical possibility that the future economic hope for resource-dependent communities of...the United States could have less to do with the consumption of natural resources than with their preservation.

Resource managers, economic planners and community leaders must become aware of this potential. **We therefore request our concerns be fully addressed and our recommendations followed as part of the NEPA process analyzing different uses of these public lands.**

4. <u>The socio-economic impacts of oil and gas development must be fully accounted for in alternatives which include such development in these RMP revisions.</u>

Oil and gas development has important impacts (both positive and negative) on the surrounding communities. These impacts need to be assessed accurately and completely by the BLM when considering any potential oil and gas development for the Glenwood Springs and Kremmling Field Offices. We have **attached** a document entitled **"The Economic and Social Impacts of Oil and Gas Development"** which describes in detail some of these impacts, along with our recommendations for assessing the impacts and mitigating them.

Oil and gas development is subject to cycles of boom and bust. The instability and lack of local control associated with oil and gas drilling are a source of both economic and social distress for communities that are too dependent on the oil and gas industry. Currently many communities in the Rocky Mountain region are experiencing the "boom." While there are benefits to the local communities, there are also costs. Landowners are incurring considerable expense to protect their homes, ranches and other property from the impacts of drilling on or near their lands. Local governments are experiencing increased costs to provide services to the expanding populations, along with increased costs due to increased traffic, crime, drug use, and demands on emergency services. Labor shifts also have costs to local communities. For example, workers may leave city or county jobs for oil and gas jobs, placing a strain on the government workforce at a time when agencies are stretched thin to handle the increased workload brought on by the boom (such a labor shift was documented in the Powder River Basin by Pederson Planning Consultants, 2001).

Along with socio-economic impacts, oil and gas, and especially coalbed methane, production poses serious additional environmental concerns which will have impacts on the local communities. Water produced during the initial stages of coalbed methane production increases the potential for damage to water quality (USGS, 1995), as well as the damage associated with surface disposal in an otherwise arid region. In Wyoming for example, where coalbed methane production has been ongoing for several years, these impacts have been well documented. Wells

in Wyoming discharge between 20,000 to 40,000 gallons per day per well (Darin, 2000). The disposal of the produced water not only affects the economics of development, but also poses serious environmental concerns. The total amount of water discharged from CBM wells in Wyoming has skyrocketed in recent years, increasing from approximately 43.5 million gallons (134 acre feet) in 1990, to 18 billion gallons (56,000 acre feet) in 2005 (Wyoming Oil and Gas Conservation Commission, 2006).

The discharging of 56,000 acre feet of water in the arid West is wasteful in the short-term (generally an acre-foot of water will supply a family of four for one year), and has potentially devastating economic impacts for affected communities in the long-term. Dewatering of deep aquifers may upset the hydrologic balance, eliminating or reducing the availability of this water for future agricultural and domestic uses, and impacting the recharge of shallow aquifers and surface water. The process of releasing natural gas from coal formations (fracturing) has the potential to contaminate household water wells (USGS 2000). Colorado, and the Glenwood Springs and Kremmling Field Offices can expect similar impacts if coalbed methane development is pursued.

5. Highlights from the EPS Profile for the Glenwood Springs and Kremmling RMPs.

Population in the 10 counties falling wholly or partially within the Glenwood Springs and Kremmling Field Offices grew 193% in the last three decades. These counties saw population growth rates ranging from 24% in Rio Blanco County to 790% in Summit County. The exception is Jackson County which saw a net decrease in population of 20%. In most cases these counties' population growth has been faster than that of the rest of the state and the U.S. as a whole.

Overall housing is still affordable in the 10-county area, however it has become less so in the last 15 years, and it is not distributed evenly throughout the area. Housing in Eagle, Pitkin, Summit, Grand, Garfield and Routt Counties is not considered affordable by households earning the median county income.

Since 1970 the area has seen steady job growth. Most counties in the area show a steady upward trend. Two exceptions are Rio Blanco County which shows a peak in employment in the early 1980's followed by a marked decline, and Jackson County which has highly variable employment throughout the period.

Personal income has also increased in the last three decades and, as seen with employment trends, Rio Blanco County experienced a marked peak in income which corresponded with its employment peak, and Jackson County's income trend mirrors its erratic employment trend. The average earnings per job and per capita income have risen in 9 of the 10 counties since the 1970s, the exception being Jackson County where average earnings have fallen, although even here the per capita income as risen.

Non-labor income makes up nearly 30% of the total personal income in the area. Jackson County is noteworthy in that non-labor income makes up 57% of the total for the county with a larger portion of total personal income in the form of income support transfer payments like welfare and unemployment benefits.

The number of professional and service firms has risen markedly in the 10-county area, as has the number of jobs and the total income from this sector. This is true even in Jackson County although the next most dominant industry is agriculture in this county.

The 10-county area is overall economically diverse, with most of the individual counties also showing a greater diversity of economic activity. Again, the exception is Jackson County which is highly specialized – most of the counties economic activity is concentrated in one sector: agriculture.

As can be seen by these selected highlights, the area impacted by the proposed RMPs is very diverse and should not be viewed as a homogenous whole. We have included an Economic Profile which aggregated the ten counties in the affected area for illustration purposes (**attached**), however we recommend that the BLM make a detailed analysis of the economic trends in each of the affected counties in the Glenwood Springs and Kremmling Field Offices.

Recommendations: BLM should analyze the socioeconomic impacts of the proposed management alternatives in accordance with the approach set out in "Socio-Economic Framework for Public Land Management Planning: Indicators for the West's Economy," including the more specific considerations detailed above. BLM must also conduct a thorough assessment of the impacts of oil and gas and coalbed methane development on the social and economic wellbeing of the communities included in the Glenwood Springs and Kremmling Field Offices. We recommend that such analyses be based on the issues and methods outlined in "The Economic and Social Impacts of Oil and Gas Development." We also request that the RMPs require that any proposed oil and gas development includes adequate measures to mitigate negative socioeconomic impacts and protect the local communities, property owners and the landscape from such harms.

ADAPTIVE MANAGEMENT

We understand that BLM may employ adaptive or "outcome-based" management in different aspects of the Glenwood Springs and Kremmling RMPs. We believe that adaptive management should only be used where it can strengthen BLM's ability to conserve resources within the multiple use mandate and should not be employed to relieve BLM of specific obligations, restrictions on development, or use of appropriate management tools such as special designations. Adaptive management can provide a method for BLM to fully and actively manage resources beginning with inventory, continuing through monitoring and analysis of impacts, to modifying management based on the results of monitoring and evaluation.
Since BLM has not yet issued any comprehensive formal guidance on adaptive management, we are providing the following recommendations in considering use of adaptive management based on existing guidance, studies and other uses of adaptive management that we have observed:

- **Adaptive management should start small and pace development with level of learning.**

In the early stages of implementing the Glenwood Springs and Kremmling RMPs, actions that may cause environmental impact should be limited until such a time where inventory, monitoring, and analysis can confirm that the resources are tending toward the desired goal.

- **Define in detail what the adaptive management process will and will not address.**

BLM should prepare a monitoring protocol that guides whether or not BLM plans to use adaptive management with specific resources. The Draft EIS should also describe the resources and specific indicators that will be measured and used to determine adaptive management so that the public can provide meaningful comments on BLM's proposed approach to adaptive management.

- **Ensure adequate baseline prior to starting adaptive management.**

BLM should prepare detailed analysis of current inventory status to accompany the EIS that clearly specifies resources and locations for which BLM lacks inventory data and establishes a timeframe to accomplish inventories for resources or locations where data is lacking.

- **Ensure agency commitment to fund monitoring.**

Commitment of adequate resources for administration of this adaptive management process should be firm and sufficient to support the full implementation of adaptive management. Funding for adaptive management should not be dependent on shifting the financial and personnel burden to various user interests or other cooperating community groups.

- **Have a "fallback" plan should monitoring or other aspects of the adaptive management process not be fully carried out.**

Adaptive management must include requirements for when and how the proposed outcome will be reevaluated if it is not being met. The agency's ability to reevaluate or amend desired outcomes should not be the sole fallback if either the adaptive management process is not working or outcomes are not being met. BLM should build into the Glenwood Springs and Kremmling RMPs provisions to address situations based on new information, circumstances, regulatory requirements, or discontinued agency funding for monitoring that would trigger a plan amendment or revision under a new EIS.

- **Process should be managed so citizens can actively and effectively participate.**

The adaptive management process should be managed so that the public can actively and effectively participate. These resource areas are broad; citizens interested in the resources governed by the RMPs reside across nine counties; and, involvement of citizens in adaptive management processes can be both timely and costly to individuals. BLM should, in addition to seeking funding commitments for fund monitoring and analysis, seek funding for citizen participation. BLM should also begin planning now as to how citizen involvement in adaptive management will meet the requirements of the Federal Advisory Committee Act, and such planning should not be left only to those citizens or community groups wishing to collaborate or advise BLM.

Recommendations: The BLM should limit use of adaptive management to appropriate situations (where the risk of failure will not cause harm to sensitive resources). An adaptive management program should comply with the guidelines set out above and the RMPs must fully explain, with sufficient detail, how BLM will employ adaptive management, what the "triggers" are for its use, and what opportunities the public will have to participate in adaptive management decisions.

Thank you for your consideration of our scoping comments. We look forward to seeing these issues addressed as the Glenwood Springs and Kremmling RMP revisions processes continue.

Sincerely,

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RED HILL COUNCIL

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GLENWOOD SPRINGS, CO.
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April 28, 2007

Mr. Brian Hopkins
50629 Hwy 6 & 24
Glenwood Springs, CO 81601

Dear Mr. Hopkins:

I am writing on behalf of the Red Hill Council a (501(c)3) to provide input to the Glenwood Springs/Kremmling Resource Management Plan revision currently in process with the BLM. The Red Hill Council has worked collaboratively with the BLM since 1995 and under a memorandum of understanding (MOU) since 2000. Jointly, we developed a plan for the 3,000 acre Red Hill Area located just outside Carbondale, Colorado. This community planning process culminated in establishment of the Red Hill Area as a Special Recreation Management Area (SRMA). This very popular non-motorized recreation area is documenting over 50,000 annual user days largely from the local area population and in particular Carbondale. The BLM lands around Carbondale play an increasing role in the economic and physical health of the community. This upward trend is a direct result of the Roaring Fork Valley's population increases, but also Carbondale's recognition of the value of the surrounding public lands as a precious and sustainable community resource. The Red Hill SRMA public process has established a model of community planning and cooperative management that could be replicated for one or more of the BLM lands near Carbondale: Barber Gulch, Thompson Creek, The Crown, Fisher Creek, Light Hill, Lower Basalt Mountain. Decisions made for these BLM lands will have a direct impact on Red Hill. Each of these areas represents an important part of the public land complex that should incorporate Carbondale's values of outdoor recreation, open space preservation, viewshed protection, wildlife protection and sustainable environments.

We offer the following comments for consideration as part of the Resource Management Plan Revision Process.

Trails - The Red Hill Council supports planning and development of additional connecting trail systems on the public lands around Carbondale. Trail development in other areas will relieve the substantial pressure on the Red Hill trail system by dispersing use over a larger area. Locations that should be given particular attention include The Crown, Barber Gulch, Light Hill and Fisher Creek. The Roaring Fork Valley has a very strong interest in trails as is evidenced by the demand for, dollars expended on and use of the RFTA trail from Carbondale to Aspen and the efforts to construct a trail up the Crystal Valley. Trails that may be planned on BLM land obviously serve a different need an experience, but strong support for trails exists throughout the Roaring Fork Valley.

Economic Benefit - The BLM lands around Carbondale historically have provided economic benefit to the community from hunters and outfitters. While this use continues, BLM public lands now attract increasing numbers of hikers, mountain bikers, equestrians, runners, skiers, campers and other lovers of the outdoors. The 50,000 user days on Red Hill alone infuse new dollars to the Valley economy. The "Carbondale Economic Roadmap" developed by EPS Consulting identifies recognition of and utilization of Carbondale's natural assets (Red Hill,

Resource Management Plan should take into account these economic benefits as supporting evidence for evaluating and including additional trails, recreational activities, and environmental protection around Carbondale.

The following comments are more specific to the Red Hill SRMA as part of the Resource Management Plan Revision.

Alternate Access - Red Hill is presently served by only one public access point. All use is forced to this single ingress/egress. A second access point would reduce the pressure on the existing access and provide an opportunity for dispersing use. In addition, a second access point would provide a completely different experience on Red Hill. An alternative access point is in keeping with the plan for Red Hill as an identified need. The existing Glenwood Springs 1982 Resource Management Plan shows a possible access across private property. The identified access would connect to County Rd. 112; a short distance from County Rd. 113. Another benefit of an access in this area is an easy connection to the Fisher Creek BLM lands. A connection from the east end of the Fisher Creek area to Red Hill would offer a continuous public lands route from the upper reaches of Missouri Heights all the way to Carbondale. Again, this would offer better dispersion of use and a very interesting experience for the recreational user. The non-motorized designation for Fisher Creek and Red Hill would minimize impacts to trails, vegetation and wildlife. This connection will tie together two distinct and very interesting trail networks.

Completion of the Master Planning Process for the Red Hill Area - The Red Hill Plan that was put together in 1996 was intended as a first step toward an overall area master plan. The time and effort required to complete the initial plan, establish the SRMA, plan and construct trails stalled the process of developing a total plan for Red Hill. The Red Hill Council feels strongly that a full master plan should be finished for the Red Hill Area that addresses possible additional trail loop connections, current/future demands, environmental impacts, and other issues. The Red Hill Council is willing and able to take the lead to develop the details of a master plan in coordination with BLM. The Red Hill Council has already proven itself capable of this task and the Council is willing to solicit matching funds with BLM to bring a master plan project to conclusion.

Replication of the Red Hill Planning Concept - The citizen initiated community-planning effort executed in conjunction with BLM for Red Hill received the prestigious BLM "Making a Difference Award". This project has been held as a model of a cooperative citizen effort that has resulted in a substantial public benefit that otherwise could not have been achieved. This model could be implemented on BLM lands in other areas of the Roaring Fork Valley as well as points beyond. The Council is willing to work with BLM and other citizen groups to help accomplish similar positive results in other areas. The Red Hill Council recommends that this type of approach be included in the resource management plan implementation actions as a method to achieve enhanced public benefits that otherwise could not be accomplished by BLM alone.

The Red Hill Council applauds BLM for moving forward with a revision to the Glenwood/Kremmling Resource Management Plan. We strongly support broad-based community involvement and participation in this process. Broad-based community participation will ensure that the final recommendations and implementation actions reflect the strongly held Carbondale area community values of environmental protection, outdoor recreation, sustainable systems/economies/environment, open space and good stewardship of public lands. The Council will continue to work closely with BLM with volunteer labor, fund raising, technical planning, and implementation. This approach will result in maximum public benefit, support of community values and sustainable management of the public resource.

Sincerely,

Davis Farrar
Red Hill Council President

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To: The Bureau of Land Management
Re: Travel management plans
April 12, 2007

The North Park Visitors Bureau voted unanimously at its regular meeting on April 11 to encourage the Bureau of Land Management to continue to allow open riding on snow during winter months.

We are concerned that the "designated routes" rule for off-highway vehicles (OHVs) mighi be imposed during winter months in travel management plans now being written. Requirin snowmobiles to follow designated routes during winter months would represent a huge problem for both snowmobiles and the BLM.

Presumably, the BLM would have to mark designated routes. Otherwise, there would be no way for a snowmobiler to know if he or she was in violation of the designated routes ru In Jackson County alone, there are perhaps 300 miles of routes that could designated for snowmobile travel. We have found such routes need to be marked at least every 60 feet so a snowmobile can follow a route even in snowstorms. That would mean the BLM woulc have to place about 26,400 markers each fall in Jackson County alone, and pick them up each spring. We would guess the route-marking problem would be much, much larger in other counties, and the enforcement problem would be monumental. If local riders in a certain county couldn't tell if they were on or off designated routes, how could BLM ranger make that determination?

The BLM's problem with designated routes would be far simpler in summer when roads and trails are fairly obvious even without markers, but that clearly is not the case in winter There is no good reason to disallow open riding in winter. Snowmobiles don't touch the ground, and therefore don't do resource damage to the surface. The Forest Service has a good rule - you can't ride snowmobiles on Forest Service land until there is at least one fo of snow on the ground. The BLM should consider adopting the same rule. Such a regulati is relatively self-enforcing; riding on thinner snow increases exponentially the odds of damaging the snowmobile and injuring the rider.

Snowmobiles will become quieter and cleaner in the future - it's inevitable as popular ridin locations such as Yellowstone Park impose new noise and pollution regulations.

Motorized off-road travel is among the fastest-growing sports in the West, yet that kind of recreation on public lands is being restricted on almost all fronts. The BLM should make a distinction between winter and summer OHV activities because the two sports have entirely different impacts on the environment.

Both for the benefits to the BLM, and to the snowmobile recreationist, open riding should be allowed during winter months.

Sincerely

David C. Hendrix 4-12-07

President, North Park Visitors Bureau

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Colorado's voice for
conservation since 1965

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May 2, 2007

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BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Via priority mail

Bureau of Land Management
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Re: Citizens' Wilderness Proposal and Lands with Wilderness Characteristics for the Glenwood Springs and Kremmling RMPs

With this letter, The Wilderness Society (TWS), the Colorado Environmental Coalition (CEC), American Rivers, Inc., Center for Native Ecosystems (CNE), the Colorado Mountain Club (CMC), and the Wilderness Workshop are submitting their proposal for designation of Wilderness Study Areas and identification of lands with wilderness characteristics as part of the scoping process for the Glenwood Springs and Kremmling Resource Management Plans (RMPs) revisions. In accordance with the issues identified in BLM's Notice of Intent, this proposal identifies areas which possess naturalness and provide opportunities for solitude and primitive and unconfined recreation. This proposal is in addition to general scoping comments submitted separately by all of the above groups and to the proposal submitted separately by five of the six groups for Areas of Critical Environmental Concern (ACEC) and Special Recreation Management Areas (SRMA). CNE will submit a separate ACEC proposal in the near future.

Please find enclosed Wilderness Inventory Reports for the following proposed wilderness areas: Troublesome, Platte River Addition, Castle Peak, Bull Gulch, Pisgah Mountain, Flat Tops Addition, Deep Creek, Thompson Creek, Maroon Bells-Snowmass Wilderness Addition and Grand Hogback.

As mentioned in our general scoping comments, we believe BLM places itself in legal jeopardy by failing to consider alternatives which designate Wilderness Study Areas (WSAs). We understand that it is current BLM policy not to consider WSA designation in the planning process. However, as discussed in our general scoping comments, both current BLM policy and recent court decisions identify the BLM's authority and obligations to inventory for and protect the wilderness qualities present in the BLM-managed lands within the Glenwood Springs and Kremmling planning areas. Many BLM offices across the West are identifying areas outside of existing WSAs as possessing wilderness characteristics and implementing management prescriptions to protect this important value, such as in the specific examples from the Moab (UT) and Little Snake (CO) Field Offices and the Arizona BLM guidance on inventorying and protecting lands with wilderness characteristics discussed in our broader comments.

We would note that the agency's current standards for identifying and managing lands with wilderness characteristics are less stringent than those applicable under the Wilderness Act and under the now-revoked Wilderness Inventory Handbook. For instance, the national guidance provides for management that emphasizes "the protection of some or all of the wilderness characteristics as a priority" over other multiple uses. (emphasis added). This guidance does not limit its application to lands suitable for designation of WSAs; for instance, the guidance does not include a requirement for the lands at issue to generally comprise 5000-acre parcels or a requirement that the lands have all of the potential wilderness characteristics in order to merit protection.

The Citizens' Wilderness Proposal (CWP) identifies lands with wilderness characteristics, inventoried in accordance with the more stringent standards of the Wilderness Act and the Wilderness Inventory Handbook. The CWP was first published in 1994 by a coalition of 47 groups and has been updated based on ongoing inventories as new information becomes available, including the attached information. The Glenwood Springs and Kremmling RMPs should acknowledge the wilderness characteristics of the areas included in this proposal and manage these areas to protect their wilderness characteristics.

BLM IM No. 2003-274 and IM No. 2003-275 clarify that the BLM can manage lands to "protect" wilderness characteristics, including by prioritizing the protection of these characteristics over other uses. Management prescriptions to protect the important wilderness characteristics of areas managed to maintain and enhance wilderness characteristics in the planning area should include:

General Guidance:

With limited exceptions, surface-disturbing activities or activities that involve the permanent placement of structures are not consistent with protection of wilderness characteristics. Specifically, the following activities should not occur within lands having wilderness characteristics:

- Permanent or temporary roads
- Use of motorized equipment or motorized vehicles
- Landing of aircraft
- Mechanical transport
- Structures, developments, or installations
- Commercial enterprises

Specific exemptions/allowances are made for:

- Valid Existing Rights. Prior-existing rights may continue. New discretionary uses that create valid existing rights are not allowed if they would detract from the wilderness values.
- Administrative Activities. New commercial activities or new permanent roads will not be authorized. BLM may authorize the other prohibited uses if it is necessary to administer and protect the lands with wilderness character and to protect the health and safety of persons within the area.

Allowed activities include, as appropriate depending upon the character of an individual area:

- Managing fire, insects, weeds, and diseases;
- Completing recurring Federal mineral surveys;
- Continuing established livestock grazing;
- Allowing for commercial services to the extent necessary to provide for activities which are proper for realizing the recreational or other wilderness character purposes and are compatible with the defined values;
- Allowing for adequate access to inholdings.

Specific Guidance:

(1) Emergencies. The use of motor vehicles and mechanical transport, and the construction of temporary roads, structures, and installations is allowed for emergency purposes, but must be conducted to achieve the least disturbance and reclaimed as soon as possible.

(2) Land Disposals, Rights-of-Ways (ROWs),and Use Authorizations. Lands to manage for wilderness characteristics will be retained in public ownership. They will not be disposed through any means, including public sales, exchanges, patents under the Recreation and Public Purposes Act, State selections or other actions (except where a vested right was established prior to October 21, 1976).

Prior existing rights, such as leases under the Recreation and Public Purposes Act, leases/permits under 43 CFR 2920, and rights-of-ways (ROWs) may continue. These also could be renewed if they are still being used for their authorized purpose.

The BLM will acquire State and private inholdings when practicable. In unique situations and subject to public review, exchanges may be made

involving Federal and non-Federal lands when such action would significantly benefit that area's wilderness characteristics.

New authorizations, leases, permits, and ROWs will not be authorized.

(3) Routes of Travel. The construction of new permanent or temporary routes or roads will not be allowed.

No cross-country motorized or mechanized travel will be allowed within areas managed to maintain wilderness characteristics. However, motorized or mechanized use of preexisting travel routes that are necessary for transportation and designated in the plan will be allowed subject to applicable prescriptions or stipulations. Motorized and mechanized routes must be minimized, and closure and restoration of unnecessary routes will be prioritized to enhance and protect wilderness characteristics. Any motorized or mechanized use off designated routes will not be allowed.

(4) Locatable Minerals. Existing and new mining operations will be regulated using the 43 CFR 3809 regulations to prevent unnecessary and undue degradation of the lands.

(5) Leasable Minerals. Existing mineral leases represent a valid existing right. These rights are dependent upon the specific terms and conditions of each lease. Existing leases will be regulated to prevent unnecessary or undue degradation. No new leases will be issued.

(6) Grazing. Existing livestock grazing, and the activities and facilities that support a grazing program are permitted to continue.

Adjustments in the numbers and kind of livestock permitted to graze would be made as a result of revisions in the land use plan. Consideration is given to range condition, the protection of the range resource from deterioration.

The construction of new grazing facilities would be permitted if they are primarily for the purpose of protecting wilderness characteristics and more effective management of resources, rather than to accommodate increased numbers of livestock.

The use of motorized equipment for emergency purposes is allowed.

(7) Fire Management. Fire management will be consistent with BLM policy. It may be appropriate to allow natural fires to burn in conformity with a fire management plan, and Wildland Fire Use is to be encouraged. Prescribed fires are allowed in conformity with a fire management plan so long as it is consistent in improving or maintaining the area's wilderness character.

Minimum impact suppression techniques will be applied.

(8) Forest/Vegetation Health. Insects, disease, and invasive species may be controlled if it is determined that it is necessary to meet the minimum requirements to administer and protect these lands.

Insect and disease outbreaks must not be artificially controlled, except to protect timber or other valuable resources outside the land with wilderness characteristics, or in special instances when the loss to resources may cause adverse impacts to wilderness characteristics.

Vegetative manipulation to control noxious, exotic, or invasive species is allowed when there is no effective alternative and when the control is necessary to maintain the natural ecological balances within the area. Control may include manual, chemical, and biological treatment provided it will not cause adverse impacts to the wilderness characteristics.

(9) Recreation. Primitive and unconfined recreational uses such as hiking, camping, rock climbing, caving, fishing, hunting, trapping etc. are allowed on these lands. Recreational uses will not be allowed if they require:

- Motor vehicles or mechanical transport (e.g., mountain bikes) off routes designated as open or limited through the route designation process;
- Permanent structures or installations (other than tents, tarpaulins, temporary corrals, and similar devices for overnight camping).

New commercial services will not be allowed unless they are necessary for realizing the primitive and unconfined recreational values. An example of an allowed commercial service would be an outfitting and guide service. Existing commercial recreational authorizations may be allowed to continue under its terms and conditions to their expiration date.

Recreational or hobby collecting of mineral specimens when conducted without location of a mining claim may be allowed. This use will be limited to hand collection and detection equipment.

(10) Cultural and Paleontological Resources. Cultural and paleontological resources are recognized as unique and valuable. They are also important supplemental values to an area's wilderness characteristics.

Resource inventories, studies, and research involving surface examination may be permitted if it benefits wilderness values. This same standard applies for the salvage of archeological and paleontological sites. Rehabilitation, stabilization, reconstruction, and restoration work on historic structures; excavations; and extensive surface collection may also be permitted if they maintain the area's wilderness character.

Permanent physical protection, such as fences, will be limited to those measures needed to protect resources eligible for the National Register of Historic Places and will be constructed so as to minimize impacts on apparent naturalness.

(11) Wildlife Management. Fish and wildlife resources are a special feature that contributes to an area's wilderness character. Whenever possible, these resources should be managed to maintain that character.

Nothing will be construed as affecting the jurisdiction or responsibilities of the State agencies with respect to fish and wildlife management on these lands. Fishing, hunting and trapping are allowable activities on these lands. The State establishes regulations and enforcement for these uses.

Stocking of wildlife and fish species native to the area may be permitted. Introduction of threatened, endangered, or other special-status species native to North America may be allowed. Management activities on these lands will emphasize the protection of natural processes. Management activities will be guided by the principle of doing the minimum necessary to manage the area to preserve its natural character.

We also wanted to specifically highlight our concerns with the potential impacts to the areas in the CWP from the helicopter flights and landings proposed as part of the Colorado Army National Guard High-Altitude Army Aviation Training Site (HAATS). HAATS has been an issue of serious and long-standing concern for the conservation community and we reiterate the importance of precluding helicopter

landings and low elevation helicopter flights to protect the wilderness characteristics of these areas.

A Roan Plateau inventory report has not been completed because it is not part of this planning effort. This submission in no way supersedes or makes our submissions regarding the wilderness characteristics of the Roan Plateau obsolete.

We are available to answer questions and provide further information regarding our proposal and look forward to continuing to discuss the protection of these valuable resources throughout the planning process.

Sincerely,

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Cc:
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BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Joe Stout, Dennis Gale
Other members of the RMP planning team
Kremmling BLM Field Office
P.O. Box 68
Kremmling, CO 80459

May 2, 2007

Dear KFO RMP Planning team,

The Rocky Mountain Recreation Initiative (RMRI) appreciates the opportunity to submit scoping comments on the Kremmling Resource Area RMP, in light of RMRI's past interest and involvement in the KFO and the Wolford Mountain Travel Plan.

We appreciate the increased protection and management the Wolford Mountain travel plan has created for this special area and with the direction you are taking thus far with the RMP.

The following is a list of points, not in any particular order, we recommend be considered in the RMP:

The RMP will include Travel Planning
This is a great idea since it will allow other RMP goals to be more easily achieved. It is difficult to manage an area for other resources if it is still open to cross-country ORV travel. An area may have received a wildlife protection designation, for example, but if motorized routes have not been designated, such management goals may not be achievable.

We support your emphasis on resource protection in considering new motorized and mechanized trails and trust that user expectations will be aligned with that goal at the beginning of the process. For upcoming Route and Trail Data Collection workshops, we suggest that the workshops include the needs of quiet and nonmechanized trail users, and of wildlife and natural resources, at the same time as the needs as motorized user needs are presented, rather than after the motorized community has already sets its sights on certain trails.

Maintain Rural Character
The Kremming FO has the opportunity to shape population growth and recreation use in West Grand County in a way that retains the current less crowded, less developed, less commercial character of this part of the county. The Kremmling region still has not lost its unique, historic, rural flavor and has a chance to maintain this in the face of the homogenizing wave of subdivision and mall development that is sweeping over the east end of the county. The BLM has a role in the outcome.

We suggest caution in developing broadly advertised, destination type recreation activities, as this means Kremmling will go the way of so many other Colorado communities and will attract levels of recreation use that will alter the special, old time feeling of western Grand County.

Set Aside Quiet Use Areas and Trails
We also encourage the planning team to specifically set aside Quiet Use areas and trails. Ideally, the Resource Area will provide a spectrum of trail opportunities, not just motorized, but clearly delineated horse, hiking and mountain biking trails, and even horse and hiking trails only, as was done in the Royal Gorge FO. The Wolford Mountain summit, for example, might be suitable for

a hiking-only trail, to protect hikers from the "speed differential" that occurs when mountain bikes or motor bikes share hiking trails. The trail over the top Wolford Mountain is already designated nonmotorized during fall, winter and spring months.

Moving from "existing" to "designated" routes.
We strongly support this change for the entire Kremmling Resource Area. We understand that Dice Hill has been a "designated route" area for some time and encourage the BLM to create the same kind of delineated trail system you did for Wolford Mountain, closing unsuitable, poorly located, and user-created trails.

SRMA Status for Wolford Mt.
We support a SRMA designation if that means protection of resources and quiet opportunities but not if it opens the door to greater and more impactful levels of recreation use. We hope the Kremmling FO can get the funding it will need for the intensive management that will be needed for the Wolford Mt. SRMA to retain its quiet and less fragmented character where these still exist.

Create new SRMAs for primitive, non-motorized recreation
Since remote, primitive, rugged backcountry is a primary BLM recreation "niche," RMRI suggest that the KFO consider identifying areas where these rare and declining values can be retained. We note such SRMAs have been proposed in the Little Snake Draft RMP, including some for hunting and other non-motorized pursuits, and we recommend you do the same.

Oil and Gas Leasing on Wolford Mt.
We are very concerned that almost the entire mountain has been nominated for an oil and gas lease sale. We hope you can find a way to defer this lease as the mineral potential does not sound very promising.

Protecting Wilderness Quality Lands
We support identifying and protecting all lands with wilderness character, even lands outside WSAs, including Troublesome adjacent areas. We suggest analyzing such areas for their potential (1 naturalness, 2) solitude, and 3) opportunity to provide primitive and unconfined recreation (and quiet).

Subsurface mineral rights on Forest Service lands
RMRI encourages the BLM to restrict subsurface oil and gas and any other leasing on Forest Service or any other lands, for example in Summit County, and to try to stop the leasing all together or at last to impose NSO stipulations! We especially urge you to conscientiously close exploratory leasing roads as soon as possible afterwards to avoid recreational encroachment and to return the land to its previous less fragmented state!!

We are very concerned that the current administration's mineral leasing program is interfering with the BLM's ability to maintain other important land values such as wildlife and recreation, and we urge you to use any opportunity or mechanism you have available to limit such leasing.

Close roads following Salvage Logging
For salvage logging in Coral Creek and N. Park, close roads immediately and keep the landscape intact.

Wild and Scenic Designation
We support W & S River designation if it will maintain flows for viable fisheries and keep use levels down.

North Sandhills Instant Study Area
We support strong interim protection for this area, similar to that for a WSA.

Big Game winter range and migration corridors.
RMRI is very concerned about impacts of possible uranium and oil and gas exploration and development on the magnificent elk and antelope herds that depend on Kremmling FO lands. The local sage grouse population likewise is dependent on maintaining unfragmented sagebrush habitat.

Wolford Mountain and environs constitute critical and severe winter range for wintering ungulates, range that DOW maps show does not exist anywhere on surrounding lands. It is critical that the BLM not allow mineral development to occur on these lands.

Displacement of wildlife by mineral development will also jeopardize the DOW's goal of attaining needed harvests to keep ungulate populations healthy. It is unfortunate that after successful completion of the Wolford Mt. travel plan, we are now faced with a new threat to this small, unreplicated and irreplaceable piece of habitat!

Sagegrouse
Sagegrouse are declining in Middle Park and everywhere over their range due to fragmentation of the sagebrush steppe. The KFP has an opportunity to protect its several rare and active leks, some of which I have observed with pleasure in the Wolford Mt area. We urge the BLM to redouble its efforts to stop further fragmentation of KFO lands.

Sagegrouse impacts need full evaluation in the EIS, in accordance with the Middle Park Sagegrouse Conservation Plan, along with impacts on big game migration corridors.

We urge every possible protection for these and other sagebrush-dependent bird, mammal and insect species and that you resist to the extent possible the prospect of mineral development.

In closing we thank you once again for this opportunity to comment and appreciate the effort you are making on this enormous but highly beneficial undertaking.

We look forward to being involved throughout the process.

Sincerely,

Roz McClellan

Joe Stout RMP Project Manager
Kremmling Field Office
P.O. Box 68
Kremmling, CO 80459

May 1, 2007

Dear Mr. Stout:

Subject: Comments Submitted on behalf of the Colorado Whitewater concerning the proposed Resource Management Plans for the Kremmling and Glenwood Springs planning areas, and Wild and Scenic River Eligibility

Colorado Whitewater (CW) is an all-volunteer organization that promotes the sport of whitewater paddling in the Rocky Mountain Region. We introduce new paddlers to whitewater, teach paddling technique, promote and teach whitewater safety, and support racing and freestyle competitions. In addition, our mission is to inform the public about river access, conservation, and other general issues concerning rivers and wilderness, while working to resolve problems related to those issues. CW has reviewed the Scoping Documents, the Wild and Scenic River Eligibility Report, and other documents relevant to the preparation of Resource Management Plans (RMPs) for the Bureau of Land Management's (BLM) Kremmling and Glenwood Springs planning areas. We offer comments relevant to CW's mission to assist the BLM in its scoping process for the RMP.

Recreation Demands and Uses

Recreation Management Areas: The BLM asks whether new Special Recreation Management Areas (SRMAs) should be created in the planning areas. With respect to the Kremmling planning area, the BLM should consider including the Blue River below Green Mountain Reservoir in the Upper Colorado River SRMA. Alternatively or additionally, the RMP should establish more structured management for recreational use of the Blue River through Cooperative Management with the Blue River Working Group. There is a significant need for improved access along the Blue River. With respect to the Glenwood Springs Planning Area, the BLM should consider management of the river segment extending from Glenwood Canyon to No Name Creek as an SRMA.

Special Recreation Permits: The KFO and GCFO currently issue Special Recreation permits for commercial use, competitive events and organized groups in special areas. CW recognizes the need for these special recreation permits however the group does not believe additional permitting for noncommercial recreational uses of the river should be considered in the RMPs.

Wild and Scenic River Designation: The Scoping document for the RMP and EIS makes reference to the Wild and Scenic Rivers Eligibility Report, in which 27 river segments in the two planning areas were determined to be eligible for Wild and Scenic designation. Through this determination, the BLM is obliged to manage these segments to protect the outstandingly remarkable value for which it was determined that the segment is eligible, until a decision on suitability for these river segments is made. While the comment period for the Eligibility report is past, CW is compelled to comment on the findings of the report. We feel that the public notice was not inclusive of key stakeholders, recreational users from the Front Range and other areas of the state beyond the Upper Colorado River Basin. Public notice for comment on the Eligibility report were limited to publications on the west slope, within the planning area boundaries, even though the Eligibility report states many times that the Upper Colorado River basin is an important recreational resource for citizens across the state, especially the Front Range. Furthermore, although CW is a participant in the Blue River Working Group, a group of stakeholders and land managers concerned with resource management on the Blue River and that includes the BLM, CW was not solicited as a stakeholder in the Eligibility process. We therefore take this opportunity to provide comment on the Eligibility Report, as well as to provide comment on inclusion of Wild and Scenic River's management in the proposed RMPs.

CW supports the findings of the Eligibility Report as they relate to the Outstandingly Remarkable Values (ORV) for recreation for the following river segments; Blue River Segment 1, Blue River Segment 2, Blue River Segment 3, Colorado River (Beyer's Canyon) Segment 2, Colorado River Gore Canyon Segment 4, Colorado River – Pumphouse to State Bridge Segment 5, Colorado River – State Bridge to Dotsero Segment 6, Colorado River Glenwood Canyon to near No Name Creek Segment 7, Eagle River, and the North Platte River. CW urges the BLM to incorporate the interim protective management of these segments as Wild and Scenic at the Recreation or Wild classification, as specified for each of the segments in the Eligibility Report. The RMPs

should specify specific management approaches that will preserve these recreational stream-related values.

Several river segments were determined not to be eligible for Wild and Scenic designation that CW believes do have ORVs for recreation, and therefore should be designated as eligible for Wild and Scenic designation.

The Piney River was determined to be eligible at the Recreational classification level strictly for the ORV based upon paleontological resources. The Piney should also be classified and managed for ORV's related to its recreational values. As described in Colorado Creeks and Rivers (1999, Banks and Eckardt), " Piney River is a wilderness creek-run that flows from high in the Gore Range north of Vail to its confluence with the Colorado River near State Bridge."

The Fraser River was considered for designation on several counts and determined not to meet any of the criteria for ORVs. CW believes the Fraser to have ORV's that would qualify it as eligible based upon its recreation characteristics. Although there is only a brief paddling season, "the Fraser is recommended for all paddlers in the area, and for others who like getting off the beaten track. There is nothing like a canyon passage, and the Fraser is the top one in the long series of canyons of the Colorado" (1999, Banks and Eckardt).

Thank you for the opportunity to submit comments on the RMPs for the Kremmling and Glenwood Springs planning areas. We look forward to participating in the process.

Sincerely

Jennifer McCurdy

Conservation Director

Colorado Whitewater

P. O. Box 4315

Englewood, CO 80155-4315

From: BLM Form Mailer
Date: Thursday, May 03, 2007 10:59:44 AM
Posted At: Scoping Comments 2007
Conversation: Kremmling/Glenwood Springs RMP Comments
Subject: Kremmling/Glenwood Springs RMP Comments

BLM Form Mailer Response

username123	
firstName	**Robert**
lastName	**Millette**
address	**0116 Deer Park Ct.**
city	**Glenwood Springs**
state	**CO**
zipCode	**81601**
phone	**970-947-9613**
email	**peregrine@rof.net**
Mailing_List	**yes**
Other_Affiliation	**Roaring Fork Sierra Club Group**
Question_1	**To the Glenwood Springs Field Office: I am concerned about the development of oil and gas resources that have severe impacts on our wildlife resources. I am requesting that the BLM include in their scoping process a provision to monitor and adhere to best management practices for protecting our fish and wildlife resources. The BLM has earlier received a document entitled \"Wildlife Mangement Guidelines for Oil and Gas Development\". These guidelines have been incorporated into a legislative bill, HB07-12989 (sponsored by Rep. Gibss and Senator Tochtrop) that was recently passed by the Senate. This bill requires that the COGCC administer oil and gas conservation law so as to minimize adverse impacts to wildlife resources affected by oil and gas operations; to**

	implement, to the maximum extent practicable, best management practices and other reasonable measure to conserve wildlife resoiurces. It requires that oil and gas operations be managed in a manner that balances development with wildlife conservation, etc. Since the BLM is responsible for authorizing gas leases, and for subsequent monitoring of drilling sites, I would urge the BLM to adhere to these new guidelines in managing oil and gas development, and to incorporate such guidelines into their planning process. ROADLESS AREAS: I am also concerned about maintaining our roadless areas in agreement with the 2001 Roadless Protection Rule (passed under the Clinton administration). I find it a very blatant disregard for the Roadless Rule for the BLM to continue to offer gas leases in roadless areas. I urge you to respect roadless area designations and not lease in these areas. This concept should be incorporated into the BLM planning process.
Question_2	
Question_3	
Question_4	
Submit	**Submit Comments**
MM_insert	**form1**

CENTER FOR NATIVE ECOSYSTEMS

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2 May 2007

Joe Stout
RMP Project Manager
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P.O. Box 68
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Kremmling Field Office

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Field Manager
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Glenwood Springs, CO 81601

Pete McFadden
Acting Field Manager
Bureau of Land Management
Kremmling Field Office
P.O. Box 68
Kremmling, CO 80459

BY ELECTRONIC AND U.S. MAIL

Re: Scoping comments plus ACEC nominations for Glenwood Springs and Kremmling RMP revisions

Dear Mr. Stout, Ms. Connell, and Mr. McFadden:

Center for Native Ecosystems, Biodiversity Conservation Alliance, and Wilderness Workshop provide the following comments supplementing joint scoping comments that we are submitting with The Wilderness Society and other organizations for use in the revision of the Glenwood Springs and Kremmling Field Office Resource Management Plans. In addition, we are including here several nominations for Area of Critical Environmental Concern designation.

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2 May 2007

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The BLM has a duty to designate and protect ACECs.

Both the Federal Land and Policy Management Act (FLPMA) of 1972, 43 U.S.C. § 1701, *et seq.* and the BLM Manual (1613) emphasize the BLM's important duty to designate and protect Areas of Critical Environmental Concern. For example, FLPMA states:

> The Congress declares that it is the policy of the United States that - ...
> 11. regulations and plans for the protection of public land areas of critical environmental concern be promptly developed...FLPMA Title I Sec.102(a) [43 USC 1701]
>
> The Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern. FLPMA Title II Sec. 201(a) [43 USC 1711]
>
> In the development and revision of land use plans, the Secretary shall - ...
> 1. give priority to the designation and protection of areas of critical environmental concern....FLPMA Title II Sec. 202(c) [43 USC 1712]

Therefore, ACEC designation and protective management are supposed to be a high priority within the BLM's mission. While this may be counter to informal agency guidance of late which has pressured Field Managers to resist protective designation, it remains the law, and we expect that the BLM's reluctance to fulfill this part of its mission will not withstand the scrutiny of the courts.

ACEC designation provides an important mechanism for the BLM to actively conserve and recover imperiled species so that the protections afforded by the Endangered Species Act and the designation of Critical Habitat are less necessary. Choosing not to conserve ACECs may contribute to the need to list species under the Act, and is inconsistent with the BLM's special status species obligations.

The BLM must provide adequate management for special status species.

BLM Manual 6840.06.D sets forth the policy for management of Sensitive species:

> State Directors, usually in cooperation with state wildlife agencies, may designate sensitive species. By definition, the sensitive species designation includes species that could easily become endangered or extinct within a state. Therefore, if sensitive species are designated by a State Director, the protection provided by the policy for candidate species shall be used as the minimum level of protection.

Therefore, the BLM must provide Sensitive species with a minimum of candidate-level protection. Candidate species are to be managed as follows:

> BLM shall carry out management, consistent with the principles of multiple use, for the conservation of candidate species and their habitats and shall ensure that actions authorized, funded, or carried out do not contribute to the need to list any of these species as threatened/endangered. Specifically, BLM shall:

1. Determine the distribution, abundance, reasons for the current status, and habitat needs for candidate species occurring on lands administered by BLM, and evaluate the significance of lands administered by BLM or actions in maintaining those species.
2. For those species where lands administered by BLM or actions have a significant affect on their status, manage the habitat to conserve the species by:
    a. Including candidate species as priority species in land use plans.
    b. Developing and implementing rangewide and/or site-specific management plans for candidate species that include specific habitat and population management objectives designed for recovery, as well as the management strategies necessary to meet those objectives.
    c. Ensuring that BLM activities affecting the habitat of candidate species are carried out in a manner that is consistent with the objectives for those species.
    d. Monitoring populations and habitats of candidate species to determine whether management objectives are being met.
3. Request technical assistance from FWS/NMFS, and any other qualified source, on any planned action that may contribute to the need to list a candidate species as threatened/endangered. BLM Manual 6840.06.C

During RMP revision, the BLM must take a hard look at whether it is meeting these obligations, and make any necessary changes to ensure that special status species are being adequately managed so that the agency is complying with the Manual.

The BLM has special duties toward special status species when conducting land use planning. The BLM must "[i]dentify watersheds that may need special protection from the standpoint of human health concerns, aquatic ecosystem health, or other public uses." BLM Land Use Planning Handbook H-1601-1, Appendix C at 2. For riparian areas within these watersheds, the BLM must also identify desired width/depth ratios, streambank conditions, channel substrate conditions, and large woody material characteristics." *Id.*

Second, BLM must:

> [d]esignate priority plant species and habitats, including Special Status Species and populations of plant species recognized as significant for at least one factor such as density, diversity, size, public interest, remnant character, or age.

BLM Land Use Planning Handbook H-1601-1, Appendix C at 3.

Finally, BLM must:

> [d]esignate priority species and habitats, including Special Status Species, and populations of fish or wildlife species recognized as significant for at least one factor such as density, diversity, size, public interest, remnant character, or age.

BLM Land Use Planning Handbook H-1601-1, Appendix C at 7.

BLM must also identify the measures necessary for protecting each of these priority areas and species:

- For priority watersheds and riparian areas, "[i]dentify measures, including filing for water rights under state permit procedures, to ensure water availability for multiple use management and functioning, healthy riparian and upland systems." BLM Land Use Planning Handbook H-1601-1, Appendix C at 2.

- For priority plant species and habitats, "[i]dentify the actions and areawide use restrictions needed to achieve desired vegetative conditions." BLM Land Use Planning Handbook H-1601-1, Appendix C at 3.

- For priority populations, species, or habitats of fish and wildlife, "[i]dentify actions and areawide use restrictions needed to achieve desired population and habitat conditions while maintaining a thriving natural ecological balance and multiple-use relationships." BLM Land Use Planning Handbook H-1601-1, Appendix C at 7.

- Also, BLM must "[i]dentify site-specific actions, such as riparian fencing, guzzler placement, etc., needed to manage ecosystems for all species and habitat for special status species." BLM Land Use Planning Handbook H-1601-1, Appendix C at 7.

Additionally, BLM must:

> Identify strategies and decisions to conserve and recover special status species. Given the legal mandate to conserve threatened or endangered species and BLM's policy to conserve all Special Status Species, land use planning strategies and decision should result in a reasonable conservation strategy for these species. Land use plan decisions should be clear and sufficiently detailed to enhance habitat or prevent avoidable loss of habitat pending the development and implementation of implementation-level plans. This may include identifying stipulations or criteria that would be applied to implementation actions. Land use plan decisions should be consistent with BLM's mandate to recover listed species and should be consistent with objectives and recommended actions in approved recovery plans, conservation agreements and strategies, MOUs, and applicable biological opinions for threatened and endangered species.

BLM Land Use Planning Handbook H-1601-1, Appendix C at 5. The BLM Manual's definition of a "Conservation Strategy" states:

> a strategy outlining current activities or threats that are contributing to the decline of a species, along with the actions or strategies needed to reverse or eliminate such a decline or threat. Conservation strategies are generally developed for species of plants and animals that are designated as BLM Sensitive species or that have been determined by the Fish and Wildlife Service or National Marine Fisheries Service to be Federal candidates under the Endangered Species Act.

BLM Manual § 1601, Glossary at 2.

The BLM must manage oil and gas drilling in a way that retains special status species and moves them toward recovery.

As we have noted in our citations of FLPMA and the BLM Manual above, the BLM has a mandate to conserve imperiled species. The agency cannot prioritize oil and gas drilling at the expense of meeting its duties toward special status species. This includes all aspects of oil and gas development – the BLM must ensure that its authorization of oil and gas drilling does not compromise air quality, water quality, opportunities for solitude, plant and wildlife habitat, cultural resources, soil crusts, or any of the other resources that the agency must conserve under its multiple use mandate. RMP revision must provide a blueprint for how the BLM will ensure that oil and gas development (all phases, including leasing, exploration, infrastructure construction, drilling, and reclamation) will be made compatible with the other aspects of its mission. In some cases, this may mean disallowing development activity altogether.

Noxious weeds threaten resources on BLM lands, and must be addressed in RMP revision.

Noxious weeds are a real threat throughout the West, and this is especially true in areas that may become infested with cheatgrass, and in places where soils are actively being disturbed. The BLM must limit surface disturbance whenever possible and implement Integrated Pest Management strategies in conjunction with all surface-disturbing activities in order to contain noxious weeds. The agency must monitor the efficacy of noxious weed containment after surface disturbance, and use the results of the monitoring to both provide realistic analyses of the effects of disturbance in planning for future projects, and to design projects that are more resistant to noxious weed proliferation. RMP revision should seriously address this threat.

The BLM must have a proven track record of successful reclamation before considering disturbances to be "temporary".

The BLM has shown interest lately in phased or rolling development, but this framework assumes that we are able to successfully reclaim areas that have been disturbed. We consider successful reclamation to consist of a return to baseline conditions, which would mean a return to the pre-disturbance vegetative composition and structure, retention of the original soil type, and recolonization by the animals that used an area prior to disturbance. We remain concerned that these results may be very difficult to achieve here in the arid West, where lack of precipitation and an abundance of invasive species may prevent even the best management practices or Conditions of Approval from being effective. Before the BLM adopts this approach, or even uses it to calculate acres of "temporary" versus "permanent" disturbance, it should be able to point to a proven track record of mature, successful reclamation projects demonstrating that this is possible and that the BLM has the ability (including funding) to make this an outcome with a reasonable expectation of being fulfilled. RMP revision should clearly state reclamation standards including necessary monitoring, and should define success in an ecologically sound way.

Dust abatement is a growing concern on BLM lands.

With the explosion of surface-disturbing activities on BLM lands in Colorado, we are increasingly concerned about indirect effects, including dust deposition. Dust may harm rare species and/or facilitate the establishment of nonnatives. RMP revision should thoroughly address dust abatement requirements, and the BLM should actively monitor dust deposition associated with surface disturbance as well as the effects on imperiled species and noxious weed proliferation.

ACEC nominations

As interested members of the public, we submit these nominations for Areas of Critical Environmental Concern under the Federal Land and Policy Management Act (FLPMA) of 1972, 43 U.S.C. § 1701, *et seq.* and the Administrative Procedure Act 5 U.S.C. § 551 *et seq.*, and pursuant to BLM Manual 1613.21.A.2.a and 1613.41. We hereby submit to Field Manager Jamie Connell nominations for ACECs for the portions of the following areas that intersect BLM surface in the **Glenwood Springs Field Office**:

- All Colorado Natural Heritage Program Potential Conservation Areas
- Occupied boreal toad habitat plus 300 ft. buffers, including BLM lands adjacent to the Snowmass Creek breeding population
- Colorado River cutthroat trout conservation populations, including the Mitchell Creek and Abrams Creek populations
- Identified lynx habitat, including Forest Service-mapped habitat on BLM lands in the following Lynx Analysis Units: Coffeepot, Quartzite, Clinetop, and Divide Creek
- Eagle Valley Evaporite inventoried Natural Area
- Greater sage-grouse production and brood-rearing habitat, including all leks plus 5.5 km buffers
- Roan Cliffs blazingstar habitat plus 300 ft. buffers
- Parachute penstemon habitat plus potential recovery areas, plus appropriate buffers to protect against upslope disturbance (300 ft. minimum)
- DeBeque phacelia habitat as defined by soil type
- DeBeque milkvetch habitat plus 300 ft. buffers
- Utah fescue habitat plus 300 ft. buffers
- Wetherill's milkvetch habitat plus 300 ft. buffers
- Sun-loving meadowrue habitat plus 300 ft. buffers
- *Sclerocactus glaucus* habitat plus 300 ft. buffers
- BLM lands adjacent to Battlement Mesa Research Natural Area
- BLM lands adjacent to Assignation Creek Research Natural Area

We hereby submit to Acting Field Manager Pete McFadden nominations for ACECs for the portions of the following areas that intersect BLM surface in the **Kremmling Field Office:**

- All Colorado Natural Heritage Program Potential Conservation Areas

- Colorado River cutthroat trout conservation populations, including the Kinney Creek population
- Identified lynx habitat, including Forest Service-mapped habitat on BLM lands in the following Lynx Analysis Units: Fraser and Williams Fork
- Greater sage-grouse production and brood-rearing habitat, including all leks plus 5.5 km buffers
- Osterhout milkvetch habitat plus 300 ft. buffers
- Penland beardtongue habitat plus 300 ft. buffers
- North Park phacelia habitat plus 300 ft. buffers
- Larch-leaf beardtongue (*Penstemon laricifolius* ssp. *exilifolius*) habitat plus 300 ft. buffers
- Crescent bugseed (*Corispermum navicula*) habitat plus 300 ft. buffers (plus additional buffering from ORV use if necessary)
- Colorado Natural Heritage Program North Platte Network of Conservation Areas
- Kremmling Cretaceous Natural Area

As more information becomes available we may submit additional nominations during the RMP revision process.

Other resources that may require special management

We reviewed our GIS data and found the following resources that may intersect BLM land in the **Glenwood Field Office**. If so, the BLM should consider special management for these resources as well:

- Midget faded rattlesnake habitat
- Razorback sucker habitat
- Roundtail chub habitat
- Bald eagle habitat
- Copper Spur SHA
- White-tailed prairie dog habitat

Similarly, the BLM should consider applying special management to these resources which may occur in the **Kremmling Field Office**:

- Roundtail chub habitat
- Whooping crane habitat
- Greenback cutthroat trout habitat
- State Wildlife Areas (these may include some BLM surface: Cowdrey Lake, Lake John, Hohnholz Lakes, Skylark Creek SHA, Windy Gap WWA)
- White-tailed prairie dog habitat

The BLM should consider input from regional conservation plans.

Several regional conservation plans have been developed which include these Field Offices. The BLM should consult the following sources during the RMP revision:

- Southern Rockies Wildland Network Design
- The Nature Conservancy's Southern Rocky Mountains Ecoregional Plan
- Heart of the West Conservation Plan

Roadless areas, Citizens' Proposed Wilderness, wildlife corridors identified by Southern Rockies Ecosystem Project, and Colorado Natural Heritage Program Networks of Conservation Areas not mentioned above are also important resources that the BLM should consider in this round of planning.

The BLM should retain existing ACECs and consider strengthening the protective management attached to them.

Other Field Offices have recently attempted to remove protections from ACECs during the RMP revision process. Instead, the BLM should carefully review existing management, ensure that the agency is meeting its obligations under the BLM Manual, and strengthen protections in these areas if necessary. Again, ACEC protection is one of the main tools at the BLM's disposal to conserve imperiled species, and the agency must take this responsibility seriously.

The BLM has not met its lynx obligations to conserve lynx habitat, and must rectify this during RMP revision.

The Fish and Wildlife Service's October 25, 2000 Biological Opinion on the impacts of Forest Service and BLM resource plans on lynx was predicated on the agencies undertaking a number of actions, but most of these have not been completed. Therefore, it appears that the BLM may be in violation of the Endangered Species Act. RMP revision provides an opportunity to rectify this situation. The BLM must consult with the Service on potential impacts to lynx and other listed species and incorporate the Service's expertise in the RMP revisions.

The Biological Opinion stated:

> The USFS and BLM agree that Plans should include measures necessary to conserve lynx for all administrative units identified as having lynx habitat, and any necessary changes will be made through amendments and/or revisions, or other appropriate mechanisms consistent with laws, regulations, and policies. (p. 7)

We are not aware of the BLM having yet mapped lynx habitat, and many of the conservation measures in the LCAS are tied directly to this required habitat mapping. Both Field Offices have identified lynx habitat according to the mapping completed by the Forest Service, and both RMPs must thoroughly address conservation of lynx habitat.

Conclusion

These Field Offices are blessed with a rich array of amazing plants and animals, and RMP revision is an extremely important opportunity for the BLM to act as a good steward of the resources that have been placed in its hands. It is time for the agency to fully acknowledge that multiple use means exactly that, and that FLPMA clearly states that habitat conservation is one of the important uses that the BLM must provide for.

Thank you for considering these comments and nominations.

Sincerely,

Erin Robertson
Senior Staff Biologist

On behalf of

Erik Molvar
Biodiversity Conservation Alliance
P.O. Box 1512
Laramie, WY 82073

Peter Hart
Wilderness Workshop
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Knowledge to Go Places

May 1, 2007

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Megan McGuire
Bureau of Land Management
Kremmling Field Office
2103 E. Park Ave.
Kremmling, CO 80459

Dear Megan:

Thanks very much for the opportunity to provide comments on potential ACEC designations for the Kremmling Field Office (KFO). Colorado Natural Heritage Program (CNHP) is pleased to nominate ten Potential Conservation Areas (PCAs) that support biological values significant enough to warrant ACEC status. This letter provides a summary of biological data and nomination rationale for each area. GIS shapefiles depicting geographic extent of recommended areas and mapped locations of significant biological resources are attached. Attached GIS shapefiles include:

- BLM ownership boundaries used in the analysis (blm_kra_clip.shp),
- PCAs nominated for ACEC designation (kra_recacec.shp), and
- Element occurrence records within each nominated PCA, clipped to BLM ownership boundary (eor_kraclip_acecfinal.shp).

The PCAs listed below are grouped by biodiversity significance, and listed alphabetically within groups. Although we consider all of these sites to be very important, the highest priorities for protection and management are the B1 (outstanding biodiversity significance) sites. B1 sites support species that occur in very few places, and opportunities for conservation are extremely limited. Loss of these sites could directly contribute to species extinctions. This is especially true for three rare plant species – *Astragalus osterhoutii*, *Penstemon penlandii,* and *Phacelia formosula*. All of these species are critically imperiled globally and in Colorado (G1/S1), and all three have the majority of known occurrences on BLM lands within the KFO. In fact, the KFO has management authority over the only two occurrences of *Penstemon penlandii* known in the world (see Troublesome Creek PCA). The PCAs that support the highest quality occurrences of these species are Laramie River Valley Shale Outcrops, North Park Natural Area, Rock Creek, and Troublesome Creek.

Natural Heritage Program
COLORADO

PCAs with Outstanding Biodiversity Significance (B1)

Recommendation 1 – Kremmling

The Kremmling PCA is located in Grand County, northwest of the town of Kremmling, along Route 40, and bordering Wolford Mountain Reservoir. This area is important because it supports a high quality (AB rank) occurrence of a federally endangered plant species, Osterhout milkvetch (*Astragalus osterhoutii*), which is considered critically imperiled rangewide and in Colorado (G1/S1). This species is only known from five occurrences in the world. All of these are in Grand County, Colorado, on BLM, private, and state lands. Four of the five known occurrences of this plant fall at least partially on BLM lands in the KFO, including all three of the highest quality (A-rank) occurrences. Portions of the occurrence at the Kremmling PCA were lost during the construction of the Wolford Mountain Reservoir dam. Nonetheless, this area still supports high quality locations and habitat for this species.

Recommendation 2 – Laramie River Valley Shale Outcrops

The Laramie River Valley Shale Outcrops PCA is in the northeastern portion of the KFO in Larimer County. This site supports two excellent quality (A-rank) occurrences of *Phacelia formosula* (North Park phacelia). North Park phacelia is critically imperiled rangewide and in Colorado (G1/S1), and is federally listed as an endangered species. Only six high quality occurrences of this species have been positively identified; four of these occurrences fall at least partially on BLM lands in the KFO. Of the three highest quality occurrences known for this plant (A-ranks), two occur within this site. Protection of this site will also benefit multiple high quality occurrences of the globally and state rare Dropleaf wild buckwheat (*Eriogonum exilifolium*) (G3/S2), Larchleaf beardtongue (*Penstemon laricifolius* ssp. *exilifolius*) (T3Q/S2), and Ward's goldenweed (*Oonopsis wardii*) (G3/S1).

Recommendation 3 – North Park Natural Area

The North Park Natural Area PCA is in Jackson County, west of the town of Walden and the Walden Reservoir, and includes the existing North Park Research Natural Area. This site supports one excellent quality (A-rank) occurrence and two good quality (B-rank) occurrences of *Phacelia formosula* (North Park phacelia). This site also supports good quality occurrences of the globally rare *Artemisia tridentata* ssp. *vaseyana /Pascopyrum smithii* mountain sagebrush / western wheatgrass shrubland community (G3?/S2?), and the *Artemisia nova / Hesperostipa comata* Western Slope sagebrush shrubland community (G3?/S2?), as well as a fair quality occurrence (C-rank) of the state rare *Lewisia rediviva* (Oregon bitterroot) (G5/S2).

Natural Heritage Program
COLORADO

Recommendation 4 – North Sand Dunes

The North Sand Dunes PCA is in Jackson County, on the east side of North Park. This site supports a good quality (B-rank) occurrence of *Corispermum navicula* (boat-shaped bugseed). Based on current knowledge, it appears that this plant is only known from two locations in the world, both in Jackson County (one on BLM land, and one on state land). Though this species does not currently have legal status (e.g., federal listing, BLM sensitive species status), it is critically imperiled rangewide and in Colorado (G1?/S1), and occupies a rare and unique habitat. ATV use is high in the area surrounding the BLM occurrence, and may be adversely impacting this plant and its habitat.

Recommendation 5 – Rock Creek

The Rock Creek PCA is located in Grand County, about 6 miles west of Hot Sulphur Springs, and just north of the Colorado River. Highway 40 and Rock Creek run through the site. This area supports excellent (A-rank) occurrences of Osterhout milkvetch (*Astragalus osterhoutii*) and Nuttall's desert-parsley (*Lomatium nuttallii*)[1]. Although Nuttall's desert-parsley has been documented in four other states (Wyoming, Montana, South Dakota, and Nebraska), the species is considered to be vulnerable rangewide (G3), as it is vulnerable to critically imperiled in all places where it still occurs (it is ranked S1 in Colorado). According to the information in CNHP's database, this plant is only known from six locations in Colorado. Three of these are on BLM lands in the Kremmling Resource Area, including the only two excellent quality (A-rank) occurrences. Protection of this site will also benefit a good quality (B-rank) occurrence of the state rare *Populus angustifolia / Cornus sericea* narrowleaf cottonwood / red-osier dogwood riparian forest (G4/S3).

Recommendation 6 – Troublesome Creek

This PCA is located in Grand County, about five miles northeast of Kremmling. This PCA has extremely high biodiversity significance because it contains both of the two known occurrences of Penland's beardtongue (*Penstemon penlandii*) in the world. Penland's beardtongue is a federally listed endangered plant species, and is critically imperiled rangewide and in Colorado (G1/S1). One of the occurrences is in excellent condition (A-rank) and the other is in good condition (B-rank). The PCA also includes one of only three known excellent occurrences (A-rank) of Osterhout's milkvetch, and one of only two known excellent quality occurrences of Nuttall's desert-parsley. Protection of this site will also benefit an excellent quality occurrence of the state rare *Schoenoplectus pungens* bulrush wet meadow community (G3G4/S3).

[1] This species is also known as *Aletes nuttallii* (Dog parsley).

PCAs with Very High Biodiversity Significance (B2)

Recommendation 7 – Case Reservoir Bluffs

The Case Reservoir Bluffs PCA is in the northern part of the KFO, southwest of the town of Walden. This site supports a good quality occurrence (B-rank) of the federally endangered North Park phacelia (*Phacelia formosula*), a G1/S1 species.

Recommendation 8 – Upper Troublesome Creek

The Upper Troublesome Creek PCA is in the southern part of the KFO, northeast of the town of Kremmling and east of the existing Ammonite ACEC. BLM lands within this site support good quality (B-rank) occurrences of four globally rare riparian plant communities, including:

- *Glyceria grandis* Herbaceous Vegetation – G2?/S2
- *Salix drummondiana / Carex aquatilis* Shrubland – G2G3/S2
- *Alnus incana* / Mesic Forbs Shrubland – G3/S3
- *Alnus incana - Salix drummondiana* Shrubland – G3/S3

This riparian system is unique in its concentration of diverse high quality plant communities, and also in that it is located in an otherwise arid part of Middle Park. The *Glyceria grandis* community is especially significant as an indicator of a stable water table, indicating that the hydrological processes are intact in this system.

PCAs with High Biodiversity Significance (B3)

Recommendation 9 – Chalk Bluffs

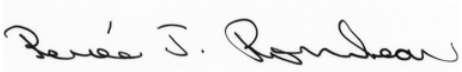
This PCA is in Grand County, just southwest of the town of Granby. It contains an excellent occurrence (A-rank) of Dropleaf wild buckwheat (*Eriogonum exilifolium*) and a good occurrence (B-rank) of the state rare Oregon bitterroot (*Lewisia rediviva*). The Dropleaf wild buckwheat is vulnerable rangewide (G3) and imperiled in Colorado (S2). This species is only known from Wyoming and Colorado, and it is considered imperiled in both states. There are six known occurrences of the Dropleaf wild buckwheat in Colorado, only two of which are excellent quality (A-rank). The occurrence at the Chalk Bluffs site is the best known occurrence on the west slope of Colorado, and is one of the two known A-ranked occurrences (the other is in Larimer County in the Laramie River Valley Shale Outcrops PCA).

Recommendation 10 – Lawson Butte

This PCA is located in Grand County about three miles south of Kremmling along route 9. It contains a good quality (B-rank) occurrence of Nuttall's desert-parsley (*Lomatium nuttallii*). This species is a regional endemic that reaches its southern-most range in Colorado. The occurrence at the Lawson Butte site is at the edge of the known range for this species.

CNHP would like to thank you again for the opportunity to recommend high priority areas for ACEC designation. We wish you best of luck in your efforts toward achieving conservation and management goals for the Kremmling Field Office. If we can be of further assistance, please do not hesitate to call.

Sincerely,



Renée Rondeau
Director/Chief Scientist

Natural Heritage Program
COLORADO

From: John Rosapepe
Date: Wednesday, May 02, 2007 11:59:51 PM
Posted At: Scoping Comments 2007
Conversation: Scoping Comments - Glenwood Springs and Kremmling RMPs
Subject: Re: Scoping Comments - Glenwood Springs and Kremmling RMPs

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May 2, 2007

John Rosapepe
Colorado Trout Unlimited
1320 Pearl Street
Suite 320
Boulder, CO 80302

May 2, 2007

Via e-mail (cormpkg@blm.gov)

Bureau of Land Management

Kremmling Field Office

Joe Stout, RMP Project Manager

P.O. Box 68

Kremmling, CO 80459

Re: Scoping Comments – Glenwood Springs and Kremmling RMPs

Colorado Trout Unlimited, with 10,000 members in the state, supports the 27 Wild and Scenic segments that were identified in the eligibility study for the Glenwood Springs and Kremmling RMPs.

Colorado Trout Unlimimited, which supports the protection and restoration of

cold water fisheries and their habitat especially supports the five segments that were found eligible on the upper Colorado River; Colorado River – Windy Gap to Hot Sulphur Springs; Byers Canyon; Below Byers Canyon to the Mouth of Gore Canyon; Gore Canyon; and Pumphouse to State Bridge because of their strong recreational fishing values which includes Wild Trout and Gold Medal waters.

The segments identified as eligible for designation as Wild and Scenic Rivers System must be managed to protect their values until their suitability determination is made by the Bureau of Land Management.

Sincerely,

John Rosapepe

John Rosapepe
Colorado Trout Unlimited
West Slope Organizer
P.O. Box 1281
Frisco, CO 80443
970.485.3011
jrosapepe@tu.org

INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION

May 2, 2007

International Mountain Bicycling Association
Drew Vankat, Policy Analyst
PO Box 7578
Boulder, CO 80306

RECEIVED
MAY - 4 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Bureau of Land Management
Kremmling Field Office
Joe Stout, RMP Project Manager
PO Box 68
Kremmling, CO 80459

Dear Bureau of Land Management,

Thank you for the opportunity to provide comments on the Resource Management Plan (RMP) and Travel Management Planning (TMP) process for the Glenwood Springs and Kremmling Field Offices. Please consider this letter the International Mountain Bicycling Association's (IMBA) formal scoping comments.

IMBA is a national and international education and advocacy organization with 750 affiliate clubs, 32,000 individual members, and more than 400 corporate partners and dealer members. IMBA creates, enhances, and preserves trail experiences for mountain bikers worldwide.

IMBA's Relationship with the BLM

IMBA and the Bureau of Land Management (BLM) have been partners for nearly two decades. IMBA was an active participant in the first BLM Mountain Bike Seminar, held in Durango, Colorado, during the 1990 World Mountain Bike Championships and has worked consistently with the BLM to develop mountain bike management strategies and an assistance agreement to provide improved trail opportunities.

In 2002, the BLM published the National Mountain Bicycling Strategic Action Plan, detailing best management practices for bicycling on BLM lands. This is a model resource designed to preserve natural resources while providing appropriate mountain bicycling opportunities. IMBA requests that the Glenwood Springs and Kremmling Field Offices utilize the Action Plan when developing mountain bicycling policies in the revised RMP and TMP processes. A copy is available on IMBA's website at: imba.com/resources/agencies/blm.html

MOU between IMBA, BLM Colorado, and Bicycle Colorado

In 2005, IMBA, Bicycle Colorado and BLM Colorado signed a Memorandum of Understanding (MOU) to foster a closer working relationship. The MOU outlines roles and responsibilities related to developing trail projects, educating all trail users on sustainable trail design and trail etiquette, and working with mountain bicyclists on plan revisions. A copy can be found at: imba.com/resources/organizing/imba_bc_blmco_mou.pdf

Important Trails and Areas

Glenwood Springs and Kremmling are home to several significant mountain biking areas. It is extremely important to our community that current access be retained, especially in non-motorized settings. As discussed later, singletrack trails provide the best possible experience for our use. OHV trails are often too wide, rocky or steep for enjoyable mountain bicycling.

Thank you for your work with the Red Hill Council. This area is a favorite of local riders and we look forward to developing further riding opportunities.

Please also allow mountain bicycling in Wilderness Study Areas (WSA) where currently permitted. Mountain bikers value WSAs and other primitive areas for the same reasons as hikers and equestrians, namely excellent opportunities for solitude, serenity and challenge.

The Troublesome WSA is particularly valuable, as it provides some of the most remote and rewarding singletrack in the entire state as well as excellent wildlife viewing opportunities. The Forest Service has allocated nearly all of Troublesome's extensive trail system to muscle-powered recreation, including bicycling. IMBA requests that the BLM do the same.

Castle Peak and Bull Gulch are also important to our community. The areas receive relatively little use though they offers varied recreational opportunities, especially to those craving more isolated backcountry experience.

Economic Impacts of Cycling

In some locales, mountain bike tourism is the fastest growing facet of local economies. In three and one half months last summer, mountain biking brought $10.3 million to the local economy in the Vancouver, Squamish and Whistler, BC region (Western Canada Mountain Bike Tourism Association, 2007).

The Glenwood Springs and Kremmling areas can provide the semi-primitive, singletrack experience that many mountain bikers desire, helping draw additional visitors to the surrounding communities. Mountain bike visitors spend money on food, lodging, outdoor equipment and more. IMBA strongly encourages the BLM to consider the direct impact that mountain bike management decisions have and will continue to have on this relatively rural setting.

Please find attached research by the Outdoor Industry Foundation on the economic impact of bicycling in the Rocky Mountain region.

Bicycle Management Principles

IMBA's vast experience helping land managers integrate mountain bicycling into trail recreation has revealed several best practices. When formulating bicycle management policies, please consider the following principles.

The essence of bicycling –Bicycling should be considered a form of non-motorized travel, rather than a human-powered form of a motorized off-highway-vehicle. Bicycling is a quiet, human-powered, healthy form of recreation compatible with other non-motorized activities. Most mountain bicyclists prefer to ride on quiet trails away from motorized traffic.

Reasons to close trails - IMBA recognizes that bicycling is not permitted in designated Wilderness areas. Additional special circumstances, such as or a demonstrated need for a single-use trail, may warrant a prohibition of bicycling in certain places. Likewise, in some areas of high use or sensitive habitat *all* recreationists should be limited to travel on designated routes only. Such rules should be applied evenly to all user groups unless science demonstrates the problem is clearly related to one type of user and not the others. Decisions about prohibiting bicycling should only be reached with involvement of the bicycling community, preferably in collaborative forums.

Trail sharing and user conflict - Hikers, equestrians and mountain bikers should be able to share trails in a spirit of common courtesy and accommodation. When user conflict occurs, the BLM should employ or select strategies that resolve the problem while preserving high quality experiences. There are many management options short of separating or eliminating uses — such as education, peer-patrolling, or alternating days — which can work to manage diverse uses compatibly. Please find the highly recommend the paper, "A Trail of One's Own?" attached.

Too many people - When facing a situation of over-use of trails, land managers should employ management methods that do not discriminate among trail use types. Restrictions should not apply narrowly to cyclists, equestrians or hikers, and instead should apply to all non-motorized user groups.

The importance of singletrack - It is critical that land managers understand the importance of singletrack to bicyclists. While doubletrack and gravel roads may offer suitable experiences for beginner cyclists or families with small children, these roads do not provide the type of recreation experience that many experienced riders seek.

Achieving trail sustainability - Where the agency faces a problem of heavy erosion or other physical problems on a trail, closure to certain non-motorized groups should not be the immediate reaction. Instead, please consider what factors may be contributing to the damage. Often, problems can be resolved through trail re-routes, reconstruction, or maintenance, often with volunteer trailworkers. The Subaru/IMBA Trail Care Crew has worked with hundreds of land managers across the country to design and repair sustainable mountain bike and multi-use trails.

Environmental Impacts of Mountain Bicycling

A growing scientific consensus has shown that bicycles have similar environmental impacts as hikers and far less than horses or OHVs. Two new studies substantiating this statement were released in 2006. The first, the most robust and well-designed to date, was conducted by Dr. Jeffrey Marion at Virginia Tech and funded by the National Park Service. Dr. Marion's research shows bicycle trails at Big South Fork National River and Recreation Area to be the least eroded, narrowest, and have the least amount of muddiness of all trails. Dr. Marion took extensive measurements and observations at 500 foot increments on a large random sample of trails, including bicycling, hiking, horse, ATV and multi-use trails.(Marion, 2006)

The second study in 2006 was conducted by recreational ecologists Dave White from Arizona State University and Pam Foti from Northern Arizona University. They led a three-year research project titled "A Comparative Study of Impacts to Mountain Bike Trails in Five Common Ecological Regions of the Southwestern U.S." Their research, published in the summer 2006 Journal of Park and Recreation Administration (Volume 24, Number 12), measured trail erosion and other impacts on 31 trails used for mountain biking in the southwestern U.S. The study concludes that, "certain impacts to mountain bike trails, especially width, are comparable or less than hiking or multiple-use trails, and significantly less than impacts to equestrian or off-highway vehicle trails."(White et al, 2006)

Please see the attached document "Natural Resource Impacts of Mountain Biking" for a more complete discussion of this topic.

Mountain Bikers Aren't "Mechanized" Trail Users

A two-category management policy should be used for classifying recreation: non-motorized and motorized. Thousands of federal, state and local parks around the country follow this system and have proven it to be the most effective management policy. By doing so, they eliminate a confusing "mechanized" category, streamline management, and fairly consider all forms of recreation based on their impact on the natural environment, other trail users, and power source.

A third category, "mechanized," suggests that bicycling has a special, unique impact that falls somewhere between foot and motorized trail use. Science has shown this to be not true. If recreation activities are to be categorized in large part by their relative environmental and social impacts, then mountain bicycling should be managed the same as other non-motorized, quiet uses.

If the BLM insists on a third category of management, then we suggest simply calling us bicycles rather than the complicated term of "mechanized." We again request the BLM apply identical policies to bicycles and non-motorized trail users, such as hikers, that create similar impacts.

Volunteerism

In many parts of the country, mountain bikers are the most active trailwork volunteers. Each year, IMBA members perform more than 750,000 hours of volunteer trail work on America's public lands. Mountain bikers are increasingly viewed by land managers as committed allies who are dedicated to environmental stewardship and improving trail opportunities for all users.

For the past ten years, IMBA has employed two traveling Trail Care Crews who assist land managers and activists in the planning, design, construction, and maintenance of trails. Our crews have visited many BLM units and are holding workshops in Durango and Crested Butte this year. The Crews lead Trailbuilding Schools that offer training in effective trail management. Please contact Trail Care Crew Coordinator Spencer Powlison at spencer@imba.com or 303-5454-9011 x101 if you are interested in exploring what the Crews can do for the Glenwood Springs and Kremmling Field Offices. Visits can include meetings with park staff, discussions of mountain bike management, volunteer trailbuilding sessions, other trailwork, or other events. IMBA also offers a fee-based consulting service called "Trail Solutions."

Many BLM units support mountain bikers' volunteerism and we hope the mutually beneficial relationship can be prominent on the Glenwood Springs and Kremmling Field Offices. To encourage this cooperation, the RMPs should discuss opportunities for cooperative programs and projects.

Summary

IMBA looks forward to continuing our partnership with the BLM and developing outstanding trail experiences for mountain bikers in the Glenwood Springs and Kremmling areas. Please do not hesitate to contact our office for any questions or clarifications.

Sincerely,

Drew Vankat
Policy Analyst
drew@imba.com
303-545-9011

Attachments:

- MOU Between IMBA, BLM Colorado, Bicycle Colorado
- "IMBA in Colorado"
- "Natural Resource Impacts of Mountain Biking"
- "A Hierarchy of Options For Managing Trail User Conflicts"
- "The Importance of Singletrack"
- "A Trail of One's Own"
- "The Active Outdoor Recreation Economy – Bicycling"

Special Districts

Horse Mountain Ranch Metropolitan District

April 17, 2007

United States Department of the Interior
Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout
PO Box 68
Kremmling, CO 80459

Re: Glenwood Springs and Kremmling Resource Management Plans
In Relation to the Horse Mountain Ranch Metropolitan District

Dear Sirs,

The Horse Mountain Ranch Metropolitan District is a Title 32 Special District located in a rural area north of Wolcott and Interstate 70 on the west side of Highway 131 (the "District"). The District is bordered on three sides by property owned by the Bureau of Land Management ("BLM"). The District is, understandably, very interested in how future use and ownership of these bordering lands will directly affect the District's taxpaying residents. The District is immediately interested in how might BLM changes to current and future plans, including the Glenwood Springs and Kremmling Resource Management Plans, impact the District and access to the residential development within and served by the District.

Through a series of agreements and easements involving, in part, a prior grant of right-of-way by the BLM to cross BLM land from Highway 131 allowing access to the residential development within the District, the District is finds it paramount to preserve the access easement which allows one (1) of only two (2) access roads into the District. The access road that crosses BLM land is the only entrance on the southern end of the District. Although there is another entrance on the north end of the District, the residents on the southern end of the development would be significantly burdened if they were to loose their southern access only had the north access entrance. Furthermore, should continued ability to have a southern access terminate, having only one access in and out of the development is understandably a major health, safety and welfare concern to District residents, property owners, guests, service providers etc. Negative and adverse impacts on the District and its residents are likely if the term and conditions of the agreements and easements governing the southern access land use/easement are altered or eliminated.

Additionally the District's property owners enjoy one of the only rural lifestyles left in Eagle County today as each home sits on a 40 acre parcel. We believe using the land surrounding the District for development purposes other than what is currently in place would be contrary to this rural lifestyle.

In closing the District would like the BLM to request the District's input and to have the BLM notify the District in advance of any proposed changes to the Glenwood Springs

and Kremmling Resource Management Plans or any other BLM plans relative to areas surrounding and giving access to the District.

For your convenience you can contact the District's management company at:

Ken Marchetti and Debbie Braucht
Robertson & Marchetti, PC
28 Second Street, Suite 213
Edwards, CO 81632
(970) 926-6060 ext 5
(970) 926-9667 Fax

Sincerely,
Horse Mountain Ranch Metropolitan District

COLORADO RIVER WATER
CONSERVATION DISTRICT

Protecting Western Colorado Water Since 1937

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BUREAU OF LAND MANAGEMENT
Kremmling Field Office

Bureau of Land Management
Kremmling Field Office
Attn: Joe Stout, RMP Project Manager
P.O. Box 68
Kremmling, CO 80459

May 2, 2007

VIA E-MAIL: cormpkg@blm.gov

Re: Kremmling and Glenwood Springs Resource Management Plan Revisions

Dear Mr. Stout:

I am submitting comments on the proposed plan for the Resource Management Plan for the Kremmling and Glenwood Springs' Field Offices ("RMP") on behalf of the Colorado River Water Conservation District ("River District"). The River District appreciates the opportunity to comment on the RMP.

The River District is a political subdivision of the State of Colorado, created pursuant to C.R.S. § 37-46-101, *et seq.*, comprised of all or parts of 15 western Colorado counties within the Colorado River basin and its principal tributaries, including the Yampa, White and Gunnison Rivers. The River District was formed in 1937 for the purpose of the conservation, use and development of the water resources of the Colorado River Basin for the benefit of all of the inhabitants of the district and is charged with safeguarding Colorado's entitlement to water under the Colorado River Compact. Through its Colorado River Water Projects Enterprise, the River District owns water rights in the Colorado River basin, including Wolford Mountain Reservoir near Kremmling, Colorado.

I. INTRODUCTION

The River District, as a water agency charged with conservation, use and development of the water resources of the State of Colorado, is primarily concerned with the Final Wild and Scenic Rivers Eligibility Report ("Eligibility Report"). As you probably know, designation of rivers in Colorado as Wild and Scenic is often contentious due to potential impacts to water rights, supplies and facilities. The River District is very concerned with these issues, however, we also recognize the need to provide protection for the values that Wild and Scenic designation offers on select rivers. Our concern is that designation pursuant to Wild and Scenic River Act ("WSRA") is too stringent

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and restrictive in its requirements, thereby reducing flexibility to meet future water demands in the Colorado River basin. The Colorado General Assembly and the State's water users have spent a great deal of time and money building flexibility into Colorado's water law system. As most of the State's river systems are already over-appropriated (meaning there are more demands than supplies), we can not afford to lose flexibility in the system. Therefore, we would rather the BLM not designate segments included in the Eligibility Report as Wild and Scenic for the reasons stated above. As an alternative, the River District supports cooperative efforts to create stream management plans or other management strategies that protect the important values associated with the State's rivers rather than designation pursuant to WSRA. Such an effort is underway in Grand County and could be applied to some of the segments being considered in the Eligibility Report.

In the River District's opinion, there are three categories of segments: 1) those that are not suitable for designation due to a variety of factors, 2) those that have Outstandingly Remarkable Values ("ORV") but where those values should be protected using strategies other than designation pursuant to WSRA; and 3) those that have no obvious disqualifying factors. Specific recommendations are listed below.

II. RECOMMENDATIONS

The River District examined the segments included in the Eligibility Report based on whether the segments were manageable for purposes of the WSRA. We evaluated manageability based on several factors and divided the segments into the following categories: 1) segment that are too short (one mile or less); 2) segments where major water facilities, such as reservoirs, are directly upstream of the segment; 3) private lands are predominate in the reach; 4) reaches very close to a highway; 5) segments that may need some level of protection but where we believe Wild and Scenic designation is not appropriate; and 6) segments that do not appear to have disqualifying factors.

A. Segments that are too short.

We recognize that there is no length requirement to designate a river as Wild and Scenic. However, there are many segments listed in the Eligibility Report that are less than one mile long, and therefore, are not manageable as Wild and Scenic and do not meet the goals of the WSRA. These segments should be dropped from further consideration and study.

<u>Segments that should not be evaluated for suitability because the segment is too short (1 mile or less) and therefore unmanageable</u>:

The Blue River, segment 1, Green Mountain Canyon (Segment 3.2.1)	Length: 1.01 miles
North Platte (Segment3.2.11)	Length: 0.07 miles
Spruce Creek (Segment 3.2.14)	Length: 0.97 miles
Mitchell Creek (Segment 3.3.8)	Length: 0.89 miles
No Name Creek (Segment 3.3.9)	Length: 0.08 miles

B. Segments that are immediately downstream from a reservoir.

Free-flowing is defined by Section 16(b) of the WSRA as "existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping, or other modification of the waterway." While the River District understands that the existence of small dams, diversion works, or other minor structures at the time the river segment is being considered shall not automatically disqualify a segment, the presence of large impoundments should disqualify a segment from further consideration. Downstream calls or deliveries of water to water users downstream drive the release schedule of reservoirs in Colorado. These releases are being made pursuant to State law and reservoir operators do not have much discretion about when or how much they must release. Therefore, the River District urges the BLM to drop the following segments for these reasons since the BLM will have no control over the releases or flows through the reaches.

Segments that should not be studied for suitability due to the presence of a major reservoir immediately upstream:

Segment	Comment
Blue River, Segment 2 (Segment 3.2.2)	Directly below Green Mountain Reservoir.
Blue River, Segment 3 (Segment 3.2.3)	In addition to being right below Green Mountain Reservoir, only a quarter of the proposed segment is managed by BLM.
Colorado River, Segment 1 (Segment 3.2.4)	This segment is below Windy Gap Reservoir and Granby Reservoir and is therefore is heavily influenced by reservoir operations. In addition, the BLM only manages 0.80 miles of the segment out of 7.32 miles.
Muddy Creek (Segment 3.2.10)	Directly below Wolford Mountain Reservoir and the BLM only manages 3.44 miles out of 8.95 miles.

Segment	Comment
Rock Creek (Segment 3.3.10)	This reach is directly below a reservoir site owned by the River District. The River District still maintains conditional water rights for the Rock Creek site and believes that this site is still feasible to help meet future West Slope demands.

C. Segments that are predominantly non-federal lands.

Many of the proposed segments in the Eligibility Report include large parcels of land that are not owned or managed by the BLM. The River District believes having Wild and Scenic segments through large parcels of private lands will be very difficult to manage. Therefore, the River District requests that the following segments not be studied for suitability.

Segments that should not be studied for suitability due to a predominance of non-federal lands within the segment:

Segment	Comment
Colorado River, Segment 2 (Segment 3.2.5)	The BLM only manages 0.31 miles of the segment out of 2.44 miles.
Colorado River, Segment 3 (Segment 3.2.6)	This segment is heavily influenced by multiple reservoir operations and the BLM only manages 3.24 miles out of 24.26 miles.
Troublesome Creek (Segment 3.2.16)	The BLM only manages 3.83 miles of this segment out of 6.26 miles.
Battlement Creek (Segment 3.3.2)	This segment is fragmented due to private land ownership, which would make it difficult to manage. In addition, this segment is listed on the State's list of impaired water, which may interfere with the purposes of the WSRA.
Eagle River (Segment 3.3.5)	The BLM only manages 5.46 miles of this segment out of 25.69 miles.

D. Segments that are too close to a highway.

The River District notes that there are several segments that are very close to highways. Being so close to a highway does not serve the goals and purpose of the WSRA. Some of these segments should not be considered for suitability to reasons listed above, but there is one additional segment that should not be considered for suitability based on its proximity to a highway.

Segments that should not be studied for suitability due to the proximity of a highway:

Segment	Comment
Sulphur Gulch (Segment 3.2.15)	This segment is too close to Highway 40.

E. Segments that deserve protection but not Wild and Scenic designation.

There are some segments included in the Eligibility Report that may deserve some level of protection for their "outstanding remarkable values", but the River District recommends that the BLM seek alternative management strategies. For example, the U.S. Forest Service created the South Platte Protection Plan ("SPPP") in lieu of Wild and Scenic designation. The SPPP provides benefits and protection to the upper South Platte River while maintaining flexibility for water supply operations. In addition, the SPPP was developed cooperatively with multiple stakeholders. The River District supports a similar approach on the Colorado River mainstem downstream of Kremmling.

There are also a few segments that have historic values that may deserve protection but are perhaps better suited for inclusion on the National Register of Historic Places ("NRHP") rather than Wild and Scenic designation.

Segment	Comment
Colorado River, Segment 4 (Segment 3.2.7)	Due to intense recreational use of this segment, the River District recommends that the BLM work on alternative management strategies, such as the SPPP, to protect this reach without the strictures of the WSRA.

Segment	Comment
Colorado River, Segment 5 (Segment 3.2.8)	Due to intense recreational use of this segment, the River District recommends that the BLM work on alternative management strategies, such as the SPPP, to protect this reach without the strictures of the WSRA.
Colorado River, Segment 6 (Segment 3.3.3)	Due to intense recreational use of this segment, the River District recommends that the BLM work on alternative management strategies, such as the SPPP, to protect this reach without the strictures of the WSRA.
Colorado River, Segment 7 (Segment 3.3.4)	Due to intense recreational use of this segment, the River District recommends that the BLM work on alternative management strategies, such as the SPPP, to protect this reach without the strictures of the WSRA.
Egeria Creek (Segment 3.3.6)	This segment does have historic value worth protecting, but the River District recommends inclusion on the NRHP rather than Wild and Scenic designation.
Hack Creek (Segment 3.3.7)	This segment does have historic value worth protecting, but the River District recommends inclusion on the NRHP rather than Wild and Scenic designation.

F. Segments that do not have obvious disqualifying factors.

In the River District's review of the Eligibility Report, several segments appear to warrant additional study to determine whether they are suitable for Wild and Scenic designation.

Segment	Comment
Kinney Creek (Segment 3.2.9)	Due to this segment's self-sustaining Colorado River cutthroat trout population, no obvious disqualifying factors and its lack of private lands, we see no problems with further study.
Piney River (Segment 3.2.12)	This is a very small reach (2.42 miles), but we see no problems with further study.

Segment	Comment
Rabbit Ears Creek (Segment 3.2.13)	Due to several ORVs and no obvious disqualifying factors, we see no problems with further study.
Abrams Creek (Segment 3.3.1)	Due to this segments self-sustaining Colorado River cutthroat trout population and no obvious disqualifying factors, we see no problems with further study.
Thompson Creek (Segment 3.3.11)	Due to several ORVs and no obvious disqualifying factors, we see no problems with further study.

III. CONCLUSION

Due to the political sensitivity related to this issue, we recommend that the BLM proceed with caution and keep water users well informed as the process moves forward. Please do not hesitate to call Dave Merritt or me at (970) 945-8522 if you have questions or would like to discuss our comments or recommendations.

Best regards,

Taylor E. C. Hawes
Associate Counsel

State Agencies

STATE OF COLORADO

Bill Ritter, Jr., Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
AN EQUAL OPPORTUNITY EMPLOYER

Bruce McCloskey, Director
6060 Broadway
Denver, Colorado 80216
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wildlife.state.co.us

Northwest Regional Service Center
711 Independent Ave.
Grand Junction, CO 81505
970-255-6100
FAX: 970-255-6111

For Wildlife-
For People

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MAY 11 2007
BUREAU OF LAND MANAGEMENT
Kremmling Field Office

May 8, 2007

Bureau of Land Management
Joe Stout
PO Box 68
Kremmling, CO 80459

Dear Mr. Stout,

Thank you for the opportunity to provide scoping comments on the Resource Management Plan (RMP) being revised for the Kremmling Field Office (KFO). The Colorado Division of Wildlife (CDOW) also appreciates the opportunity to participate as a cooperating partner in the RMP process. Several CDOW personnel attended the open-house scoping meetings held by the KFO and agree with the issues already identified by the BLM. Below is a list of planning issues the CDOW believes are important to the lands affected by the RMP. The following issues are listed in no particular order.

BLM preliminary planning issues presented at the scoping meeting:

1) Mineral Development
2) Wildlife and Special Status Species
3) Travel Management
4) Fire Management
5) Livestock Grazing
6) Recreation Activities
7) Special Designation and Visual Resource Management

Potential wildlife and habitat concerns of the CDOW:

1) Public Access
2) Sagebrush Steppe Fragmentation
3) Timber Management (pine beetle activity)
4) Winter Range Protection (big game and sage-grouse habitat issues)
5) Mining Reclamation
6) BLM Land Disposal

We look forward to working with the BLM during the revision of the KFO RMP.

Sincerely,

Ron D. Velarde

Ron D. Velarde
Northwest Region Manager

DEPARTMENT OF NATURAL RESOURCES, Harris D. Sherman, Executive Director
WILDLIFE COMMISSION, Tom Burke, Chair • Claire O'Neal, Vice Chair • Robert Bray, Secretary
Members: Dennis Buechler • Brad Coors • Jeffrey Crawford • Tim Glenn • Roy McAnally • Richard Ray

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BUREAU OF LAND MANAGEMENT
Kremmling Field Office

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May 15, 2007

Bureau of Land Management
Attn. Jamie Connell
Field Office Manager
50629 Hwys 6&24
Glenwood Springs, CO. 81601

Dear Jamie:

The Colorado Division of Wildlife (CDOW) has had an opportunity to examine the Glenwood Springs Resource Management Plan Revision, Scoping Information Packet. The plan covers a geographic area that coincides with portions of CDOW's Area 7 (Grand Junction), Area 8 (Glenwood Springs), Area 9 (Hot Sulphur Springs) and Area 10 (Steamboat Springs). The plan will affect several different Districts within each of the Areas and therefore requires attention from four separate Area Wildlife Managers and several District Wildlife Managers as well as various Biologists.

The CDOW recognizes the fact that the Colorado Department of Natural Resources has signed on under Cooperating Agency Status and that this review is just the beginning of a complex look at diverse activities that occur on the landscape within the planning area. The Division of Wildlife is planning on attending upcoming meetings that will involve all cooperators and help to shape the final document.

The Planning Area is quite diverse in regards to both the abundance and relative diversity of wildlife species. The area covers ecosystems that range from Desert like to Alpine Tundra. This large range in system types allows for an extreme diversity in terms of species on the landscape. Most of the BLM in question is related to lower elevation areas that generally are less likely to have large amounts of precipitation during the calendar year.

Preliminary Planning Issues that were identified in the Scoping document included:

- Oil and Gas Development
- Range Health/Upland Management issue
- Water/Riparian Issues
- Recreation
- Travel Management/Transportation
- Cultural Resources
- Sage Grouse and Sagebrush Obligate Species
- Urban Interface issues

DEPARTMENT OF NATURAL RESOURCES, Harris D. Sherman, Executive Director
WILDLIFE COMMISSION, Tom Burke, Chair • Claire O'Neal, Vice Chair • Robert Bray, Secretary
Members, Dennis Buechler • Brad Coors • Jeffrey Crawford • Tim Glenn • Roy McAnally • Richard Ray
Ex Officio Members, Harris Sherman and John Stulp

In addition to the issues mentioned above the CDOW recognizes the following as items that will need to be addressed during the process:

- Winter Range and Severe Winter Range Protection/Enhancement/Condition
- Loss of Wildlife Production Areas and Movement Corridors
- Habitat Fragmentation- both on BLM lands and surrounding private property
- Livestock Grazing and related management
- Land Disposal with regards to strategic parcels important to wildlife habitat and wildlife management
- Competing recreational uses to BLM properties and related affects to hunting.
- Public Access issues with regard to many diverse user groups and isolated land locked BLM parcels.
- Habitat Loss due to development
- Habitat health to include weed management and Pinon/Juniper encroachment.
- Cutthroat Trout and water quality issues
- Colorado River Fish Endangered Species issues
- Mineral development other than Oil and Gas.
- Recreational conflicts with ACEC's within the planning area.
- Regulation and Law Enforcement concerns.
- Oil and Gas development- specific concerns:
    1. Overall landscape scale affects
    2. Surface spacing
    3. Reclamation- weed management
    4. Performance based management
    5. Cluster development
    6. Facility/Equipment consolidation
    7. Staged development
    8. Mitigation
    9. Additional items for discussion include: COA's, 1999 EIS, FONSI, NEPA and BLM Instructional Memorandums.

The Colorado Division of Wildlife looks forward to taking part in stakeholder meetings and discussions that are centered around but are not limited to the broad areas outlined above. As this process moves forward the CDOW will impart species specific information that will assist in the development of a comprehensive RMP amendment to the Glenwood plan. Thank you for the opportunity to comment at this early stage of the game.

Sincerely,

Ron

Ron D. Velarde
NW Regional Manager

cc: Dean Riggs, CDOW- A-7
Perry Will, CDOW- A-8
Lyle Sidener, CDOW- A-9
Jim Haskins, CDOW- A-10
Joe Stout, BLM, RMP Project Manager
Jim Bennett, BLM, Associate Field Manager

APPENDIX G
COMMENTS ADDRESSING DESIRED OUTCOMES AND MANAGEMENT ACTIONS

The follow matrix provides comments that directly addressed three specific questions that were included on the scoping comment form. This input, along with all scoping comments, will be used by the BLM to help develop goals, objectives, and management actions in the RMP.

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	Management Actions	Landscape Characteristics including Allowable Uses (land use allocations)	Desires Outcomes / Desired Future Condition
Land Use Planning Handbook Definitions	Land use plans must identify the actions anticipated to achieve desired outcomes, including actions to maintain, restore, or improve land health. These actions include proactive measures (e.g., measures that will be taken to enhance watershed function and condition), as well as measures or criteria that will be applied to guide day-to-day activities occurring on public land. Land use plans also establish administrative designations such as ACECs, recommend proposed withdrawals, land tenure zones, and recommend or make findings of suitability for congressional designations (such as components of the National Wild and Scenic River System).	Land use plans must identify uses, or allocations, that are allowable, restricted, or prohibited on the public lands and mineral estate. These allocations identify surface lands and/or subsurface mineral interests where uses are allowed, including any restrictions that may be needed to meet goals and objectives. Land use plans also identify lands where specific uses are excluded to protect resource values. Certain lands may be open or closed to specific uses based on legislative, regulatory, or policy requirements or criteria to protect sensitive resource values. The land use plan must set the stage for identifying site-specific resource use levels.	Land use plans must identify desired outcomes expressed in terms of specific goals and objectives. Desired outcomes should be identified for and pertain to resources (such as natural, biological, and cultural), resource uses, (such as energy and livestock grazing), and other factors (such as social and economic conditions). Desired Future Condition – The future condition of land resources on a landscape scale that meet management objectives.
Scoping Question	1) What issues or concerns do you have regarding public land resources or uses within the Glenwood Springs or Kremmling Field Offices (FO)? *(please identify the FO or a specific location(s) within the FO if possible)* 2) Keeping in mind the issues above, what changes would you make physically to the landscape (e.g., what should it look like, modifications); to administration (e.g., management actions, rules, regulations, etc); and social characteristics (e.g., number of users, size of groups, behavior of users, etc.)?		3) Managers will be studying various viewpoints for the planning area. What are the benefits (social, recreational, environmental, and economic, etc.) that your changes above provide to: public land resources, public land users businesses, communities, etc.?
GENERAL			
	Eliminate the booze parties.	Regulations should stay the same.	Keep it so everyone can use the land
		Small groups of people (less than 5) should be allowed on to these lands as long as they practice leave no trace ethics.	Dismantle all of the development, drilling and mining operations currently in place and return the land to its natural state
		No modifications or changes - Keep the landscape unchanged.	Greater appreciation by the public of the mid-valley (Roaring Fork) landscape
RECREATION AND VISITOR SERVICES – General			
	Clean up mound of garbage from informal hunter camp south of E. Sheep Mountain (E. ridge that is E. of FS 107).	Prefer not to see development of formal picnic or camping areas, letting people, within reason, camp and picnic where they choose.	Colorado River below McCoy stay pretty much the way it is.
	Barriers, signage, occasional patrols in areas subject to abuse.	Do not allow horses on any of the Carbondale or Glenwood trails - destroy the trail, bring black flies, etc.	Preserve the wild lands we have left for limited recreation, i.e., non-motorized use.
	Better education for all trail users about sensitive eco-systems and how to keep from impacting them	Require the use of colostomy bags on horses.	In the best interest to our community, - personal quality of life and attractiveness of our area to future tourism - to keep our wild areas relatively primitive,

Management Actions	Landscape Characteristics including Allowable Uses (land use allocations)	Desires Outcomes / Desired Future Condition
		while accepting the relatively minor impacts caused by allowing free access to hikes, hunters, fisherman, climbers, skiers, mountain bikers, and boaters
Utilize universal design criteria whenever possible to facilitate access for the aging population.	Disperse users across a greater area to reduce user contact overall.	More sensitive use of the landscape.
Promote more BLM lands for mountain bike use. McCoy area has a proven, often used an established trail system for ATV; motorbikes, mountain bikes, etc. It would be a perfect recreation area.		Community sustainment, reduced vehicle usage and increased quality of life. I feel that making a trail system that encourages multi users and helps address the issue of overweight people.
Develop and maintain support facilities for access (parking, restrooms, fishing support, etc.)		Education, eco-tourism, light impact hiking and camping; these are all beneficial activities that help sustain the health of BLM lands and add substantial dollars to the local economy.
		Smaller communities rely on income from gas, food, motels, etc. from hunters
		Expanding recreational opportunities would keep recreationalists from driving up-valley to access larger tail networks reducing the use of fossil fuels.
		Carbondale is a bedroom community for the Roaring Fork Valley but is fast becoming well-know for its scenic beauty and range of recreational activities (i.e. local bike paths; kayaking, fishing, rafting on the Crystal and Roaring Fork Rivers; mountain biking on Red Hill and on the dirt roads near Thompson Creek.
		This area is primarily tourist dollar driven. -"their" dollars fuel the valley's economy in a very sustainable manner. Most visitors are repeat customers and will return for our world class recreation opportunities.
		Sustain the quality of life and nearby recreational opportunities that draw people to the area in the first place.
		Appreciation for nature and environment.
RECREATION AND VISITOR SERVICES – Thompson Creek		
All (45) routes restored, putting the hangers that have been removed back on the bolts.	No climbing (Thompson Cr.?)	Climbing is a unique recreational opportunity that takes place here.
Climbers can monitor the area, maintain the trail, etc.	Unrestricted rock climbing access - groups of any size allowed in the area	Thompson Creek is the only local climbing area that the people of Carbondale and surrounding area have to enjoy out sport nearby. This area is excellent for

Management Actions	Landscape Characteristics including Allowable Uses (land use allocations)	Desires Outcomes / Desired Future Condition
		meeting friends for a peaceful afternoon in the outdoors. I personally like to take my newborn son there to watch me climb and learn about the outdoors
I would support a less-restrictive management prescription - 9 climbers at the crag at any one time for Thompson Creek. No additional restrictions.	Limitation on visitors is increased to 15	Close proximity - Thompson Creek crag is the closest rock climbing available to residents of Carbondale. It is a small area, of interest primarily to local climbers as a place to go on weekends or after work - reachable for a bit of after work "evening cragging".
Recreation expansion, i.e., Thompson Creek (climbing)	No limit put on areas as far as numbers go, but maybe down the line sometime a reservation system may need to be implemented for large (10 or more) groups.	Rock climbing at Thompson Creek is a valuable asset for the whole community - a number of local schools have or are developing outdoor programs.
In the future perhaps CRMS could teach classes on climbing here.	Designation should be scaled back from the overly prohibitive and unrealistically out-of-date classification of "primitive"	The Thompson Creek crag is an ideal venue for small school groups to learn rock climbing skills and to experience the natural environment.
Keep the place from being ruined by climbers camping on the local roads in the Thompson Creek area.	No additional restrictions for Thompson Creek.	More human-powered recreation within the greater Thompson Creek area will lead to a greater sense of community investment in, and care for, the area than it currently enjoys.
	The changes in the landscape - limit to foot traffic.	Climbing is a great recreation activity which can potentially draw limbers from around the world, thus boosting local economy.
		The Thompson Creek climbing area has increased a sense of community among local climbers - develops and creates great community between various members of society.
		A unique opportunity to be challenged by a variety of great climbs in a beautiful setting.
		Acts to connect the community
RECREATION AND VISITOR SERVICES – Red Hill		
All dogs should be leashed on Red Hill (aka Mushroom Rock) - dangerous and destroys the fragile soils along the trail sides.		Expand recreational opportunities directly from Carbondale (Red Hill and the Crown).
Recreation expansion, i.e., the back side of Red Hill for additional trails		Recreational (summer) opportunities such as the trails like Prince Creek and Mushroom Rock/Red Hill are major reasons that I choose to make my life in the valley….sacrifice a lot (high cost of housing) to live in this valley….those sacrifices are outweighed by

Management Actions	Landscape Characteristics including Allowable Uses (land use allocations)	Desires Outcomes / Desired Future Condition
		the recreational opportunities.
		The economic benefit to the Town of Carbondale and the surrounding area created by the popularity of mountain biking - mountain biking destination.
		BLM has received great publicity from the Red Hill project and now enjoys a solid relationship with the local community.
RECREATION AND VISITOR SERVICES – The Crown		
	Designate the Prince Creek/Crown parcel as a SMRA.	Expand recreational opportunities directly from Carbondale (Red Hill and the Crown).
		Recreational (summer) opportunities such as the trails like Prince Creek and Mushroom Rock/Red Hill are major reasons that I choose to make my life in the valley….sacrifice a lot (high cost of housing) to live in this valley….those sacrifices are outweighed by the recreational opportunities.
		The recreation opportunities are a HUGE asset to living in this area. A simple thing like a bike path through a town can increase property values, provide safe and pleasant outdoor experiences for residents, and increase overall livability of an area. This hold true for all the recreational areas in and around Carbondale. I am deeply proud of the community in which I live. A big reason for that are these outdoor recreational areas and the way in which the users treat it. Mountain bikers, trail runners, and hikers all treat each other with respect and courtesy on Red Hill. There are always exceptions, but I think this says a lot about how we all care about this area.
WILDERNESS CHARACTERISTICS		
	Motorized recreation should be minimized in wild areas.	
	Do not favor most other kinds of restrictions, such as group size.	
ACECs – Thompson Creek		
	The current designation at Thompson creek is no longer applicable or relevant.	

Management Actions	Landscape Characteristics including Allowable Uses (land use allocations)	Desires Outcomes / Desired Future Condition
	The Thompson Creek ACEC definitions of primitive recreation, but rather backcountry.	
WILDLIFE		
Impacts on wildlife would be mitigated		Preserve the wild lands we have left for wildlife habitat.
		East Eagle is a vital wildlife habitat that should be protected
CULTURAL RESOURCES		
Develop interpretation of historic and natural features as appropriate.		
TRAVEL AND TRAILS - General		
Need to open Ute Creek Drainage just east of 131 out of Wolcott. The trail head off of the dump area has been closed & posted to ATV travel. This has forced some to access off of the railroad to Ute Creek BLM Trail system.	Support citizen trail improvement works to allow access without arbitrary numbers limits.	Additional trails - having specific use trails to avoid conflict - allows the community greater outdoor access close to home when a longer trip may not be an option.
Signage with the names of trails and difficulty level of the trail.	Motor vehicles of ALL KINDS should be RESTRICTED to specific trails that get a higher level of trail maintenance	Having beautiful trails with respectful trail users
Utilize sustainable principles for trail design and materials for trail construction	Improve / increase the number of trails that are open to the mountain bike community	Restricting traffic will reduce major environmental damage including erosion, protectanimals/birds, reduce violent confrontations between motorized/nonmotorized and create a more fair usage division in BLM lands; reduce possible invasion of private lands, provide some kind of protection for auditory and pollution benefits so non-motorized users don't have hear or smell motors.
Enforce rules - better enforcement and maintenance of nonmotorized use signs	Multi-use trails with few restrictions on user limits, group size, behavior should be encourages until there are true management or user conflict issues.	Providing controlled access to our public lands, we can create and continue Colorado's reputation as a leader in outdoor recreation and tourism, as well as a responsible contributor to our energy needs
Add more signed trails		
Off-highway vehicle routes - signage and closing some routes, lead to better management these areas from environmental standpoint and it would limit a		

Management Actions	Landscape Characteristics including Allowable Uses (land use allocations)	Desires Outcomes / Desired Future Condition
spider web of off-highway vehicle routes		
Better maintenance of nonmotorized use signs		
Trail maintenance improvements used to withstand the increase usage. - improvements or new trails should utilize the latest in erosion resistant trail building techniques		
Maps of the area trails and perhaps some verbiage on trail etiquette.		
Better mapping of trails for mountain biking and hiking close to the urban corridors		
Increase safety for foot/bike traffic.		
Develop as part of the plan implementation to notify public of any changes to road access, parking, allowed uses, etc.		
TRAVEL AND TRAILS – Carbondale Area		
The Crown - improved upon and build more trails - expand single track.		The benefits to building more trails could be to bring more recreational users to Carbondale increasing business opportunities in town and the surrounding communities.
The Thompson creek area would benefit from a better designated trail.		
Modest improvements of the Thompson Creek trail.		
Expand the number of trails in both Basalt and Carbondale area (the back side of Red Hill and the Crown).		
Connect Willitz/Emma and Carbondale through the Crown.		
TRAVEL AND TRAILS – Eagle-Gypsum Area		
	Hardscrabble area - open designation is no longer appropriate for this area - should be changed to Limited (designated to roads and trails)	Road closures in the area has had a negative financial impact.
	Area by Gypsum should be motorized.	
	Hackett Gulch needs to be non-motorized.	
	East Eagle should be closed to All Motorized Vehicles - adjacent to a Residential Area.	

Management Actions	Landscape Characteristics including Allowable Uses (land use allocations)	Desires Outcomes / Desired Future Condition
LANDS AND REALTY		
Develop more access points on Red Hill - possibly from Cattle Creek Road.		By not selling BLM parcels, we keep open space.
Don't sell public lands unless there is a benefit to the public above and beyond the cash flow.		More access equals a better quality of recreation
Improve access to public lands for all user groups		
LIVESTOCK GRAZING		
	Limit grazing as cattle destroy the native vegetation, increase briars and weeds, and destroy the trails.	
Stop aerial shooting	Predator control should not be allowed on public lands.	
	Grazing on riparian areas would be stopped. Fencing would be put in place. Seasonal BLM people would be hired to collect data – future treatment revisions would be made accordingly.	
SOILS		
		With management of the fall big game hunting and limiting the off road use, there will be less erosion.
VEGETATION		
Impacts on grazing lands, or riparian terrain would be mitigated	Grazing on riparian areas would be stopped. Fencing would be put in place. Seasonal BLM people would be hired to collect data – future treatment revisions would be made accordingly.	

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