

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

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**Appendix G  
Comment Response Table**

for the  
**Glade Run Recreation Area  
Recreation and Travel Management Plan**

**Environmental Assessment DOI-BLM-NM-F010-2013-0197-EA**

**February 2014**

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U.S. Department of the Interior  
Bureau of Land Management  
Farmington District  
Farmington Field Office  
6251 N. College Blvd., Ste. A  
Farmington, NM 87402  
Phone: (505) 564-7600  
FAX: (505) 564-7608



**BLM**

**It is the mission of the Bureau of Land Management to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.**

## COMMENT RESPONSE TABLE

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The following table provides BLM's responses to substantive public comments received on the Environmental Assessment #DOI-BLM-NM-F010-2013-0197-EA for the Glade Run Recreation Area (GRRA) Recreation and Travel Management Plan (R&TMP). Consistent with NEPA regulations (40 CFR 1503.4(b)), this appendix focuses on substantive comments on the draft EA. Substantive comments include those that challenge the information in the draft EA as being accurate or inaccurate, or that offer specific information which may have a bearing on the decision. Possible responses to substantive comments are:

- Modify alternatives including the Proposed Action.
- Develop and evaluate alternatives not previously given serious consideration by the agency.
- Supplement, improve, or modify its analyses.
- Make factual corrections.
- Explain why the comments do not warrant further agency response, citing appropriate sources or authorities. (40 CFR 1503.4(a)).

All comments were reviewed by a team of BLM specialists and categorized according to their substantive versus non-substantive nature. Substantive comments were reviewed further and broken down into a comment matrix that divided the comments by which portion of the document was in question (e.g. which section it related to). These substantive comments are the ones that BLM has provided responses to. Comments that merely express an opinion for or against the Proposed Action were not identified as requiring a response. In cases where the comment was substantive but appeared to indicate that information in the draft EA was either misunderstood or unclear, a response was prepared to clarify the information.

Please consult the environmental assessment for detailed information on changes that may have occurred in response to comments received.

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Comment Summary	Section	Response
<p>User conflict definition and citation; BLM not authorized to manage personal philosophical beliefs. User conflict is outside the authority of the BLM to manage. Any such disputes should be handled with local law enforcement. There is no analysis of conflict nor documentation that conflict even exists. If BLM is going to include user conflict, data documentation and analysis needs to be completed. To continue to analyze user conflict, BLM would be setting a legal precedent that could get us into hot water.</p>	<p>1.2/1.3</p>	<p>See Sections 1.2 and 1.3.</p>
<p>Historical context for RAR - Golden Anniversary Partnership</p>	<p>1.2</p>	<p>Included as historical context in the background section. Recreation addresses volunteer and partnerships to collaborate with IMBA on education and trail development.</p>
<p>Data and analysis throughout the EA does not support the stated purpose and need. Lack of supportive data causes BLM to not meet NEPA standards. Specifically, describes population growth and increased demand for recreational opportunities: how about some solid numbers, charts showing increased resource use numbers by type or resources/activity, so we have a better idea what you're struggling to accommodate/manage, and why you're making the choices you're making.</p>	<p>1.3</p>	<p>Section 1.3 addresses the purpose and need for this planning effort. In addition, the social and economic features section (3.13) addresses population growth and other related information.</p>
<p>The RTMP is supposed to cover ALL modes and aspects of recreation, but all modes and aspects and not analyzed individually in each Chapter 3 section, especially the affect of non-motorized recreation uses. Additionally, we fail to consider other impacts from: O&amp;G, grazing, commercial activities, and the true impact of facilities. Also include numbers from camping permits, SRPs, etc.</p>	<p>1.3</p>	<p>Analysis in Chapter 3 for all sections has been reviewed to address all forms of recreation and permitted activities including 1) non-motorized recreation, 2) mechanized recreation, 3) OHV recreation, and 4) permitted users (industrial users).</p>

Comment Summary	Section	Response
<p>We state that public safety is a concern and fail to demonstrate or provided data to show that it is even a problem. Also, we should not be determining which activities are safe or unsafe. Using public lands is a liability assumed by the user and we don't want to be in a position that we intend to manage safety and can be shown, in a court of law, to have failed. That will open us up for litigation.</p>	<p>1.7</p>	<p>Comments from the general public have indicated their concern for safety on trails that are unmarked, provide only a one-way in/one-way out access, or the potential for additional congestion on trails. Public safety is address through the development of a sign plan, designation of trail routes (with or without directional signage), and additional detailed maps.</p>
<p>We fail to address our multiple resource and sustained yield mission without degradation of resources.</p>	<p>1.5</p>	<p>Section 1.5 explains that this document is in conformance with laws, statutes, and regulations including FLPMA; which mandates the BLM to be a multiple use agency.</p>

Comment Summary	Section	Response
<p>RMP Conformance: we contradict ourselves in our plan conformance statements between the first and second paragraphs: change this section to state that all decisions not relating to travel management are in conformance with the Farmington RMP, and explaining what the decisions are that may amend the RMP. Also, Clearly disclose the relationship to any existing agency planning documents, any requirements to amend or modify those existing documents, and the logical (and chronological) sequence for those amendments and modifications.</p>	1.5	<p>Section 1.5 clearly distinguishes between those actions that are amending the Farmington RMP and those that don't constitute an amendment.</p>
<p>No reference to OSNHT, associated legislative authority, and partnerships.</p>	1.6/1.7	<p>Section 1.6 documents the legislative authority of the National Historic Trails Act designation of the Old Spanish Trail as a National Historic Trail. Furthermore, the following management prescriptions encourage the use or and collaboration with volunteers and organizations: GRRR-CAA-MA-49 and GRRR-CAA-MA-50.</p>
<p>Temporary emergency closure: lack of inventories, expanding, uncorrected, and unrestricted OHV destruction necessitates closures.</p>	1.7.2	<p>Multiple requests were made to close the GRRR using the temporary or emergency closure procedure (43 CFR 8364). Guidance provided in IM 2013-035, Requirements for Processing and Approving Temporary Public Land Closure and Restriction Orders, urges managers to take corrective actions to prevent activities from causing "considerable adverse effects" prior to initiating a temporary closure or restriction order. This planning effort is considered a reasonable corrective action and as such requests to close the area are not considered further.</p>

Comment Summary	Section	Response
Fees for use: pay-to-play permits coupled with education on restrictions, etc. Very fees by level of impact of the recreational use (e.g. OHVs pay more than mtb bikes, that pay more than horses, that pay more than pedestrians).	1.7.2	The GRRRA does not currently meet the development levels that would allow BLM to charge visitor use fees.
Need to address, in detail, law enforcement issues and concerns: Need to include a better sign plan and implementation of sign plan. We are creating a larger burden on LEOs and need to address how the plan will help LEOs patrol and monitor the area. Analyze the difficulties of not having a LEO plan with this EA and how that will make the EA and implementation un-enforceable. Discuss how we will handle protection of natural and cultural resources.	1.7.2	Law enforcement staffing or priorities are determined on a district wide level and is handled administratively. Management prescriptions outline in this document will enhance law enforcements ability to be more effective enforce rules and regulations.
Streamline SRP process: reduce the amount and types of paperwork required to apply for an SRP, waive fees for organizations, change the organized group definition to exclude advertising and club rides or safety events, and don't apply group size restrictions.	1.7.2	BLM is required to follow the SRP Handbook (H-2930-1) and associated CFRs (43 CFR 2930) when administering permits.
Pinion Mesa RA: incorporate PM in this planning effort and protect it from OHV use (e.g. non-motorized recreation)	1.7.2	Pinon Mesa Recreation Area is outside of the scope of this planning effort.

Comment Summary	Section	Response
<p>Issues not identified or carried forward: no mention of shooting and woodcutting problems and issues, explain why we are not considering an amendment to the supplementary rules to include shooting (justify, justify, justify!!), ACEC boundaries beef up the justification of why we aren't considering amending the boundaries (after all, we can file the necessary Fed Reg paperwork to implement any boundary suggestions), LEO is outside the scope: Provide explanation for why this it outside the scope of implementation level planning. All implementation level planning, or just this plan?; the impacts sections include how beefed up LEO enforcement will make things better but state in chapter 1 that LEOs are outside of the planning doc. This needs to be reconsidered and all analysis changed. Why are you differentiating between alternatives submitted during public scoping and issues considered but not further analyzed? In the alternatives submitted section, you discuss numerous issues that do not meet the purpose and need, similar to the issues considered by not further analyzed.</p>	<p>1.7.2</p>	<p>The GRRA is closed to all wood cutting and vegetative collection. Firewood cutting and vegetative collection is managed by a permit system in areas outside of the GRRA. Permits are available at the FFO. The State of New Mexico is the managing authority for recreation based noise. NMDGF managed all wildlife and hunting on public and state lands throughout the state of New Mexico.</p>

Comment Summary	Section	Response
La Plata TMP: consider implementing the LP TMP with a new routes inventory. It has the same basic management prescriptions and is already signed. It provides a realistic approach to signing and education. Also, it already limits cross-country travel. It has an option to add additional routes.	1.7.3	Within the La Plata TMP document it states multiple times that the plan does not cover routes (roads, two-track roads, and trails) located within an SDA, of which the GRRRA is one (pg.4, 6, and 7).
State vs federal law conflict on shooting and OHV road use	1.7.2	On BLM public lands, federal regulations apply. Frequently these regulations are in line with local state regulations, however, where the regulations differ, federal jurisdiction takes precedence.
Hard look and failure to include all issues: we dismissed the OSNHT, failed to evaluate impacts to cultural resources, ACEC, made arbitrary boundary adjustments, did not include VRM, have no clearance inventory of any cliffhanger trails, lack of law enforcement commitments, no EJ section and a bad definition for mechanized vehicles.	1.7.2	Additional information has been added throughout the document. Please review the Table of Content for the appropriate location of each discussed resource.
RS2477	1.7.2	To date, no RS2477 claims have been made on any roads within the planning area.

Comment Summary	Section	Response
<p>Additional trails: equestrians would like additional trail dedicated to them, there is need for more loops on all the trail systems, T82867, T82874, T86692, T88794 should be opened as return routes for the ATV/UTV trail, motorcycle groups has brought in a proposal for additional single-track motorized trails including loops, avoid one way in/out trails unless it goes to a scenic overlook, uni-directional trails, create a connecting trail from Anasazi to Kensey's with a N bound trail and a S bound trail. Need to have clearly marked trails throughout the area and uni-directional trails to prevent collisions and increase user safety. Open all sand washes for use (T84016 and T86693) and keep RAR as motorized single-track. Identify motorized single-track trails across RMZ 1 from E to W and from the N end of Foothills. Open ridge lines to single-track motorized use and create a children and families trail for ATV and single-track riders (separate trails, though).</p>	2.4, 2.5, 2.6	<p>Additional consideration for routes can be found in sections 2.4, 2.5 and 2.6 as well as Appendix F: Route Comparison Tables. Additional analysis of proposed routes is discussed in Section 3.10.</p>
<p>Area segregation: We are required to consider segregating recreational uses and there is plenty of land for all if we just could allow the segregated uses. Segregation takes away from some and gives to others.</p>	2.4, 2.5, 2.6	<p>Sections 2.4, 2.5, and 2.6 all address various alternatives that would/would not segregate users across the planning area.</p>
<p>ATV/UTV trails: ATV/UTVs should share the same trails and all be 65- 75 inches in width at a minimum.</p>	2.1.3, 2.4, 2.5, 2.6	<p>Section 2.1.3 further refines the various OHV categories (e.g. ATV, UTV, 4WD, Jeeps) and describes how they will be defined for this EA (e.g., max width, type of routes, etc.). Sections 2.4, 2.5, and 2.6 address various alternatives that include lumping ATV/UTV together and keeping them separate.</p>
<p>Boundary adjustment: Having the boundary of RMZ 1 along the edge of the trail will nullify the 'quiet' nature of the area as OHV's will be 'buzzing' along the boundary. Consider a westward expansion for increased OHV use. Double check all maps that they have accurate boundaries.</p>	2.3.4	<p>Sections 2.4, 2.5, and 2.6 all address various alternatives that would/would not expand, change or otherwise amend various proposed boundaries and routes, including the boundary of RMZ 1 and routes that cross or border this area.</p>
<p>Buffer zone around private property: provide a limited to designated buffer zone around any private property, specifically those properties to the west and central southern boundary of the GRRRA.</p>	2.4, 2.5	<p>Section 2.4 and 2.5 Alternative C provides for a limited to designated routes area in place of the RMZ 3 open area.</p>

Comment Summary	Section	Response
CFR contradiction 43 CFR 8341.1(G) OHVs yield to all others, including pedestrians.	2.3.1	Section 2.3.1 has been corrected to follow 43 CFR 8341.1 (G) which states that OHVs yield the right-of-way to pedestrians, saddle horses, pack trains, and animal drawn vehicles.
Change Quiet Zone name: not an appropriate name as the area is an urban interface, has O&G development, and allows for OHV use. Either define 'quiet' and explain how the area would meet 'quiet' standards (also need to be defined) or change the name.	2.4, 2.5, 2.6	Section 2.4, 2.5, and 2.6: RMZ names have been eliminated.
Committed resources (e.g., funding, staff, etc.); adequate resources need to be committed to complete data gathering, committed LEOs or other forms of patrol, inventory and develop mitigation/protection measures for ss species, cultural and natural resources, provide funding for signage, information kiosks, infrastructure (facilities), and education. Without committed resources, the plan will fail. Also an implementation plan needs to be developed with the current EA. This plan needs to include LEO patrols/presence, education, staging area development, and how BLM will address and respond to public safety issues.	1.7. 2.4, 2.5, 2.6	Sections 1.7 discuss law enforcement considerations related to this planning effort. All action alternatives propose various levels of facility development.
Continued level of OHV access throughout area: Keep entire area open for OHV use (e.g. no RMZ 1), expand open area to the entire Glade, mitigation can resolve use conflicts without having to separate groups. Displacement will occur in one of two ways, if mitigation doesn't work. 1) no restriction will cause the eventual displacement of less conspicuous uses or 2) restrictions on conspicuous users will cause them to move out. Providing quality alternatives for one or both uses is key to resolving conflict.	2.4, 2.5, 2.6	There are a wide range of alternatives proposed in the EA. Alternatives range from keep it the way it is (No Action Alternative) to providing an expanded open area, to removing the open area.
Deregulation: too many restrictions, law enforcement will become a nightmare	2.1.3	BLM is mandated to designate lands as Open, Limited, or Closed to OHV use. Current policy also guides BLM to forego a limited to existing designation in favor of a limited to designated designation with appropriate side boards (e.g., width, season of use, etc.).

Comment Summary	Section	Response
<p>Develop monitoring standards and remediation requirements if standards aren't met. Establishing a standard by which the scope and duration of the impact of each use (recreation) category can be measured. Establishing conditions of access and requirements of mitigation and remediation based on impacts, not use category, is a sound method for management. No meaningful measures to protect cultural resources, public health and safety, and protect or manage the OSNHT. Address rehab and reclamation procedures.</p>	<p>Appendices and Chap. 3</p>	<p>Appendices B-D discuss various forms of monitoring, maintenance and rehabilitation measures. Additional information can be found in the relevant section in Chapter 3.</p>
<p>Education, communication and signage: BLM has allowed single-track trails expand into 30 foot ROWs by OHV use and no actions proposed to remove illegal roads. GRRRA is a lawless area plagued by unnecessary and undue degradation. More education and information will reduce conflict and explain what activities are allowed, where, etc. Clearly mark all trails and boundaries of each RMZ as well as along private property boundaries. Properly construct trails and sign them. Install kiosks with user education information as well as fines for violations.</p>	<p>Appendices</p>	<p>Appendix C contains a sign plan and updated education/outreach plan.</p>
<p>Equality of routes: Mtn bikers have more trails than anyone else. Concerned about closing a large portion of the Glade to motorcycle users. The alternatives emphasize motorized recreation over all other types. Closure of trail in RMZ 1 to motorized use would degrade the recreation experience and consolidate users into a smaller, more congested, non-looped trail system and contradicts GRRRA-CAA-G-1. Congestion on fewer OHV trails will be a problem. The amount and quality of trails has not been appropriately analyzed by each use type.</p>	<p>2.4, 2.5, 2.6</p>	<p>Additional consideration for routes can be found in sections 2.4, 2.5 and 2.6 as well as Appendix F: Route Comparison Tables. Additional analysis of proposed routes is discussed in Section 3.10.</p>

Comment Summary	Section	Response
<p>Facilities: gate all O&amp;G roads not open to the public, fence the boundary of RMZ 1, kiosks, restrooms, and camping areas, equestrian facilities. Each RMZ needs its own staging area. Include a staging area at the terminus of CR 3536 and use CR 3536 to convey OHV users across to the main Glade wash or develop a frontage trail. Fence section 28 and 21 to prevent bandit routes from being created. Consider geo-fencing with ignition interlocking systems.</p>	<p>2.3.3, 2.4, 2.5, 2.6</p>	<p>Developed facilities are discussed in section 2.3.3: Management common to all action alternatives. Conveyance routes and other travel based facilities (e.g., gates) are discussed in Sections 2.4, 2.5, 2.6 and Section 3.10 Transportation and Travel.</p>
<p>Fees: charge a fee to maintain trails, signs, education, restrooms and camping areas. Recreational use should be treated the same as permitted uses. Make LEO fines substantial to deter behavior. Without a fee, mitigation and rehab costs will be borne by persons that didn't necessarily create the impacts.</p>	<p>1.7.2</p>	<p>Recreational use is considered casual use until it meets the basic criteria for a Special Recreation Permit. The GRRRA does not currently meet the minimum development standards for BLM FFO to develop a business plan. This level of development would require significant and sustained investment.</p>
<p>Future condition: lack of clarity and vision for the desired future condition</p>	<p>2.1.2</p>	<p>Section 2.1.2 discusses the NRRSM including current and future desired conditions of the GRRRA.</p>
<p>Glade area closure: don't close the Glade</p>		<p>The EA does not contain an alternative that proposes a closure of the GRRRA to OHV use or recreational use, in general.</p>
<p>Intensive recreation: EA fails to acknowledge the appropriateness of the planning area for intensive recreation use. There is a need to provide growing urban areas with suitable recreation experiences on nearby public lands and this area has a long established niche for motorized and non motorized recreation. While balancing the need to provide recreation with protecting natural resources is appropriate, in this area, it is appropriate for the agency to "tilt the balance" toward more intensive recreation management.</p>	<p>2.1.2</p>	<p>Section 2.1.2 addresses the NRRSM for the GRRRA including current and future desired conditions of the area. The NRRSM does show that the area already has vast recreation opportunities and makes considerations to increased future use.</p>
<p>Job development: trail education and monitoring positions for the public would be opened up</p>		<p>Providing employment opportunities is outside the scope of this document. Additional information related to the potential economic impact of the GRRRA R&amp;TMP can be found in Section 3.13</p>

Comment Summary	Section	Response
multiple use trails: preserve	2.1.3	Section 2.1.3 has been clarified to explain the overlapping trail designations that occur during travel planning.
No Action Alternative: GRRR-NA-MA-1: describes future activities, the No Action should describe the current situation not potential future situations. Also, trail designation has already happened in the NA alternative. Use it instead of a new plan.	2.3.2	The only trail designated in the 1996 plan was the Road Apple Rally trail. All other routes were recommended for future designation but not formally designated. GRRR-NA-MA-1 is a management action from the 1996 GRTS plan and would therefore be utilized if the No Action Alternative was selected.
No Quiet Zone: avoid or make smaller RMZ 1	2.4, 2.5, 2.6	Sections 2.4 and 2.5, Alternative B provide an alternative that does not contain an RMZ 1 (previously labeled the Quiet Use Area).
No wash trails: GRRR-NA-MA-6 .... Washed should be prohibited to allow rehab to occur. Physical barriers should be place to prevent use.	2.4, 2.5, 2.6	Sections 2.4, 2.5, and 2.6 address various travel and transportation alternatives that include or prohibit the use of some or all washes. Physical barriers (fencing, gates, etc.) are discussed as options in section 2.3.2.
Noise in Quiet Zone: RMZ 1 is not really quiet, there is O&G traffic, OHV traffic including the propose conveyance routes, compressors and other energy infrastructure, it is in an urban area that precludes quiet recreation opportunities. Additionally, using the trail as the boundary will cause OHVs to race up and down creating additional noise. Proposal of RMZ 1 is a violations of 40 CFR 1506.2(d) and outside the authority of the agency. It is alsos prediccisional. BLM has no authority to regulate noise.	2.1.2	Section 2.1.2 addresses the NRRSM for the GRRR including current and future desired conditions of the area. The NRRSM does show that the area already has vast recreation opportunities and makes considerations to increased future use.
Noise: state versus federal regs.: Incorporate exisitng state and local regulations as it relates to noise issues.		BLM FFO has a Notice to Leases related to noise decible limits. This NTL as well as local state/county law are followed as they relate to noise issues.
Open Area: BLM should not be allowing sacrafice (open) areas. Objections to including section 21 as part of the open area. Enjoys the open area.	2.4, 2.5, 2.6	Sections 2.4, 2.5, and 2.6 offer a variety of alternatives that encompass converting the open area to a limited to designated routes or expanding the open area.

Comment Summary	Section	Response
<p>OSNHT management perscriptions: BLM has the responsibility to manage and protect the OSNHT and cultural resources associated with the trail. We should have consulted with professional experts on the OSNHT, including and especially Rob Sweeten, Rob Perrin and Deb Salt. NPS responsibilities for OSTNHT should have mandated formal consultation with NPS for the R&amp;TMP EA. The BLM/FFO should now look at impacts to the OSTNHT in the GRRRA and insure that no 299 applications or existing oil and gas infrastructure are compromising/potentially compromising the OSTNHT. In addition, Visual Resource Management (VRM) class III designation of the OSTNHT in the 2003 BLM Farmington Resource Management Plan is the wrong designation for a National Historic Trail. Certainly, no new adverse impacts such as powerline sitings should conflict with the OSTNHT and VRM classification needs revision to protect this resource.</p>	<p>2.4, 2.5, 2.6</p>	<p>Consultation was conducted with NPS Lead Susan Boyle and SO Lead Sarah Schlanger. Additionally with the Salida del Sol chapter of the OSTA. VRM II is does not meet management requirements of an area that is 100 percent leased for oil and gas development. Additional information can be found in Section 1.7.2 and the up-dated cultural resouces section.</p>
<p>OSNHT management perscriptions</p>	<p>2.3.2</p>	<p>Resources have been reallocated to conduct a preliminary cultural survey of the OSNHT within the GRRRA planning area. Pending survey and the national comprehensive management plan, interim management is discussed in sections 2.4, 2.5 and 3.6. Section 3.11 addresses volunteer and partnerships. Proposed management perscriptions for the OSNHT are addressed in sections 2.4, 2.5 and 2.6. GRRRA-NA-G-1: provided for a wide variety of recreation opportunities and is not mutually exclusive to one recreation opportunity over others. The OSNHT is specifically identified and management perscriptions detailed in GRRRA-CAA-MA-2 for all action alternatives (e.g., not inclusive of the No Action Alternative). Additional informaiton related to the OSNHT has been added in the cultural resources section</p>
<p>Partnerships: BLM should develop local patnerships to help with law enforcement needs. Also to perform rehab, reroute, and trail work.</p>	<p>3.11</p>	<p>Section 3.11 Recreation addresses volunteer and partnerships.</p>

Comment Summary	Section	Response
Public review of all routes including trails: OHV routes wasn't appropriately evaluated and trail data not available for public review	2.3.3	Transportation data, including trail data, was provided in a variety of formats.
R&PP lease change: COF will not pursue a lease if a connector trail is created from Anasazi to Kinsey's. In addition the regional and neighborhood park are off the table. R&PP lease sizes need to be include in Table 6. Need to clarify the lease terms such as length of time, patenting instead of leasing, if additional NEPA will be done with different terms and conditions, and if a Notice of Realty Action has been published. A detailed POD and management plan are required as well as a cadastral survey prior to the lease approval.	2.4, 2.5, 2.6	Sections 2.4, 2.5, and 2.6 addresses the proposed R&PP lease by alternatives.
Rename trail: Rename the "orange trail" on the map Kenny's Revenge		It is unclear which 'orange' trail and which map this name change would affect.
Safety course trail		There was no identified location or trail system to be used to create a safety course. Provisions in the EA provide for additional, future trail designation opportunities.
Traffic in Quiet Zone: Table 6 is misleading in that there are multiple routes and O&G roads that cross RMZ 1. By providing all these routes, OHVs will continue to abuse and destroy single track trails. Also, the proposed conveyance routes will essentially cut the RMZ 1 into three areas instead of one and all the motorized use (permitted or otherwise) will continue to make the area loud. If given access to RMZ 1, OHVs will continue to go where ever they want to regardless of the limited to designated category.	2.3.4	Sections 2.4, 2.5, and 2.6 address various travel and transportation alternatives that include or prohibit the use of some or all routes that cross the proposed RMZ 1 area. In addition, section 2.1.2 describes the current, existing conditions and level of development in the area (Natural Resource Recreation Setting Matrix).
Trail segregation: motorized and non-motorized single track users don't belong on the same trail system. Must follow the National management strategy for OHV Use on public lands, USDI BLM 2001	2.4, 2.5, 2.6	Sections 2.4, 2.5, and 2.5 offer a variety of segregated or shared areas/routes that vary by alternative.

Comment Summary	Section	Response
<p>Transportation: various routes need to be reanalyzed as they appear to not connect into anything else. The plan also ignores existing CR and municipale route that would function as conveyance routes across RMZ 1. CR 3536 was dismissed due to it terminating at private property when in reality it is an excellent route for a conveyance corridor and 'safe' for OHV use. No cliffhanger trail inventory or documentation on maps. Open area has closed routes, why? Reassess all the Cliffhanger trails and carefully document which are open, limited, closed, etc. Table 15, clarify OHV use in width. The question is whether OHVs greater than 50 " are allowed. Need to show all routes in an inventory map including all washes, O&amp;G routes, CR, municipal, etc. KML files don't match the route comparison table. Document the reasoning behind the route closures.</p>	<p>2.4, 2.5, 2.6, Appendicies A and F</p>	<p>Additional consideration for routes can be found in sections 2.4, 2.5 and 2.6 as well as Appendicies A (Route Evaluation Form) and F (Route Comparison Tables). Additional analysis of proposed routes is discussed in Section 3.10.</p>
<p>Uni-directional trails: one trail isn't enough to accommodate the number of riders and causes users to go both directions which is a safety concern.</p>	<p>2.4, 2.5, 2.6</p>	<p>Additional consideration for routes can be found in sections 2.4, 2.5 and 2.6 as well as Appendix F: Route Comparison Tables.</p>
<p>User conflict is outside the authority of the BLM to manage. Any such disputes should be handled with local law enforcement. There is no analysis of conflict nor documentation that conflict even exists. If BLM is going to include user conflict, data documentation and analysis needs to be completed. To continue to analyze user conflict, BLM would be setting a legal precedent that could get us into hot water.</p>		<p>All portions of the EA have been adjusted to provided for a variety of recreation experiences and uses.</p>
<p>Use technology to facility alternative development</p>		<p>The EA is an adaptive management document that can utilize new, inovative technology as it becomes available.</p>
<p>Wilderness designation</p>		<p>The planning area does not meet the minimum requirements to be proposed as a wilderness area.</p>

Comment Summary	Section	Response
<p>Corridor Management. The purpose of designation of historic trails under the National Trails System Act cannot be achieved by simply establishing and managing a continuous travel way, but is inextricably related to establishing and managing a “trail protection corridor.” In order to give historic trail users the intended “open-air” recreation opportunity there must be attention to what measures will provide a “vicarious experience of the original users.” To meet this objective of the historic trail designation the travel way should be managed as the anchor to the visual and auditory historic experience in the landscape from the perspective of a traveler on the historic route. The continuous trail protection route is the combination of the historic travel way (or retracement) inseparable from the historic landscape and setting.</p>	<p>2.4, 2.5, 2.6</p>	<p>Sections 2.4, 2.5 and 2.6 propose a variety of trail corridor alternatives. As additional information becomes available, the perscriptions proposed in these sections can be amended to better manage the OSNHT.</p>
<p>The following four factors should be considered in establishing and managing the historic trail protection corridor:</p> <p>Landform integrity. Contrast the described or inferred condition of the landforms visible from the travel way during the period of significance of the trail to the current landform condition. In this case the period of significance is the Armijo caravan passage in 1829 and return in 1830. The extent (width) of the corridor should be defined from what an equestrian viewer would see in the foreground from the travel way. In the Glade Run area the major change in landform is the scars created for gas well drilling, particularly where well pads and operation areas have been constructed by cut and fill. Pipeline and roadway scars where cut and fill have left berms or have not been re-contoured are also a noticeable change in the foreground from the historical condition. Historic trail protection corridor landform alterations should be minimized and reclaimed where feasible to approximate the historic condition where this is compatible with reducing soil loss.</p>	<p>2.4, 2.5, 2.6</p>	<p>Sections 2.4, 2.5 and 2.6 propose a variety of trail corridor alternatives. As additional information becomes available, the perscriptions proposed in these sections can be amended to better manage the OSNHT.</p>

Comment Summary	Section	Response
<p>Vegetation integrity. Compare known or inferred historic vegetation species composition, distribution, and density during the period of significance to the current composition, density and distribution was visible from the perspective of travel way users. Because the Old Spanish Trail functioned not only as a pack trail (west bound) but also as a livestock driveway (east bound), the vegetation type, density and distribution was critical to the functioning of the trail. Contrasting the current vegetation to the vegetation during the period of significance is an important aspect of the ability of visitors to be afforded the “opportunity to vicariously share the experience of the original users” of the route. Historic trail protection corridor vegetation should be managed to re-establish where feasible vegetation types, density and distribution approximating the historic condition where this is compatible with sustained native vegetation rehabilitation objectives.</p>	<p>2.4, 2.5, 2.6</p>	<p>Sections 2.4, 2.5 and 2.6 propose a variety of trail corridor alternatives. As additional information becomes available, the prescriptions proposed in these sections can be amended to better manage the OSNHT.</p>
<p>Landmark integrity. Historic trail users navigated primarily by reference to natural landmarks. These landmarks are often distant features where vegetation and alternation do not dominate the appearance of the landform from the perspective of the travel way user. Distant landmarks are less likely to be under the same land ownership and management prescriptions as foreground landform and vegetation. Nevertheless the inferred appearance during the period of significance and the current condition need to be explicitly analyzed to manage the historic trail user experience.</p>	<p>2.4, 2.5, 2.6</p>	<p>Sections 2.4, 2.5 and 2.6 propose a variety of trail corridor alternatives. As additional information becomes available, the prescriptions proposed in these sections can be amended to better manage the OSNHT.</p>
<p>Cultural landscape integrity. The cultural modification of the “natural landscape” during the historic trail period of significance is compared to the current situation of cultural modifications of the landscape. To the extent feasible federal historic trail protection corridors should minimize sights and sounds out of character within the period of significance of the historic trail. Permitted uses within the historic trail protection corridor should put a priority on providing a viewscape and soundscape maximizing for trail users to be afforded the “opportunity vicariously share the experience of the historical users of a historic route.”</p>	<p>2.4, 2.5, 2.6</p>	<p>Sections 2.4, 2.5 and 2.6 propose a variety of trail corridor alternatives. As additional information becomes available, the prescriptions proposed in these sections can be amended to better manage the OSNHT.</p>

<b>Comment Summary</b>	<b>Section</b>	<b>Response</b>
Please remove NEPA unapproved Cliffhanger Trailheads and trails from the GRRR R&TMP EA.	2.4, 2.5, 2.6	Sections 2.4, 2.5 and 2.6 offer a variety of Cliffhanger trailheads and associated trails for designation.

Comment Summary	Section	Response
The description of the affected environment needs expanded.	General	Chapter 3 has been updated.
Existing conditions in the GRRRA do not meet BLM's FLPMA mission, land health standards, or proper stewardship of public land.	General	Chapter 3 has been updated.
O&G development has created the majority of the impacts seen in the Glade, not recreation.	3.11	Section 3.11 addresses transpiration within the GRRRA.
The EA states that "...routes with higher levels of motorized use cause more sedimentation and require more maintenance to control erosion than routes with lower levels of non-motorized use." This description is irrational in light of the EA's own description of the soils. "water erosion hazard is slight to none"	3.1	Please review section 3.1 and 3.2
Throughout the EA the impacts of Alt B are stated as worse than Alt A, however there are very little differences in the OHV use in the two Alternatives. Alt A and B have same management prescription but only B will somehow have negative impacts on non motorized visitors and adjacent land owners.	Chapter 3	Chapter 3 has been updated.
The GRRRA is a severely degraded and damaged ecosystem with extreme sedimentation and erosion...	3.1	Please review section 3.1 and 3.2
The GRRRA is a severely degraded and damaged ecosystem with...dead ecological zones, low vegetative cover...	3.3	Section 3.3 has been further refined.
The GRRRA is a severely degraded and damaged ecosystem with ... high amounts of invasive weeds.	3.4	Section 3.4 has been further refined.

Comment Summary	Section	Response
<p>There are several versions of the Armijo Route extrapolated by historians and historical trail enthusiasts. The Congressionally designated “map” should be considered an approximation of the Armijo Route from which historical trail managers should use as a guide to establish the most likely route with more detailed historical and archeological investigations.</p> <p>For fine grained analysis for a proposed federal “action [under NEPA]” or federal “undertaking [under NEPA]” historical maps provide the best first approximation of where the historic trail was located and where physical evidence of a trail may still exist. The National Trail System Act does not require physical evidence of the historic travel way for the federal trail administrator to discharge its responsibilities to assure the continuous designated historic trail is available for open-air recreation and appreciation.</p> <p>The best available information is that the Armijo Route of the Old Spanish National Historic Trail in the Glade Run are be anchored to the wagon road illustrated on the 1881 GLO Plat in T31N R12W which has been projected on the USGS 7.5’ topographic map coverage of the Glade Run vicinity (see Figure 3). In this case the wagon road that was important enough to place on the plat in existence 130 years ago is much more likely to have a detectable physical trace than a pack trail that the only known historic is 180 years ago documenting a passage in one day with 30 or 60 men and an unknown number of pack animals. This situation is typical of the historical and archeological evidence of the Old Spanish National Historic Trail throughout its designated 2700 mile length, and particularly true of the designated Armijo Route; a single documented passage with a vague reference that a portion of the party used the same route for return.</p>	3.7	Please review section 3.7 to address OSNHT.
<p>The GLO Plat indicated that as the wagon road enters the east side of the township it is following the most direct route from the Animas crossing in the vicinity of modern Aztec and following a “least cost” pathway which is the most current route of Light Plant Road (NM 574). As it enters the Glade Run Recreation Area, the GLO plan wagon road then deviated from the Light Plant Road route heading more directly west across the Farmington Glade and the features labeled on the GLO plat as “Divide La Plata and Animas Rivers.” As the wagon road depicted leaved the west side of the Glade Run recreation it veers more northerly than the inferred route of the Armijo Route which follows the unnamed drainage from “Knob Rock Dam” to “McDermott Arroyo” and then into the site of “La Plata” and then passing through the gap in the “ceja” continuing up Murphy Arroyo and pas the south end of “Barker Dome.”</p>	3.7	Section 3.7 has been further refined to address OSNHT.

Comment Summary	Section	Response
<p>Section 3.6.1 pg 110, this section contains comments on the statements made about the Old Spanish Trail with the EA statements in bold and my comments regular type. The entire narrative consideration of the OSNHT in the EA is in the following five sentences, each of which is inaccurate or misleading:</p> <p>“At the northern end of all alternatives lies the designated “Armijo Route” of the Old Spanish Trail.”</p> <p>a. This should read the “designated route of the Old Spanish National Historic Trail (116 Stat. 2790; P.L. 107-325).” There is approximately 3.5 miles of legally designated portion of the OSNHT within the Glade Run Recreation Area as illustrated, but not labeled on the map in Figure 25.</p>	3.7	Section 3.7 has been further refined to address OSNHT.
<p>“Designated in 202 as a National Historic Trail, the Old Spanish Trail takes its name from the Spanish Colonies in northern New Mexico and southern California that were economically linked by this rugged route.”</p> <p>a. According to law “ The Old Spanish National Historic Trail, an approximately 2,700 long trail extending from Santa Fe, New Mexico, to Las Angeles, California that served as a major trade route between 1829-1848, as generally depicted on the maps numbered 1 through 9 . . . including the Armijo Route . . . .” It is debatable that the trail “takes its name from the Spanish colonies” and in fact this statement confuses the fact that it is a historic trail that relates to the Mexican period. Why not just use the language of the law?</p>	3.7	Section 3.7 has been further refined to address OSNHT.
<p>“In 1829, Santa Fe merchant Antonio Armijo led 60 men and 100 pack mules northward through Largo Canyon and the vicinity of present-day Aztec, New Mexico.”</p> <p>a. Nowhere in the primary documents of the Armijo caravan is there reference to “100 pack mules.” While the unsupported inference of the number of mules with Armijo on the westbound caravan is frequently stated, I can find no support for this “fact” in the original documents, or the translations of the documents (see Hafen and Hafen pages 156-165). I think it is also more than a quibble that Armijo was headed northwest down the Largo drainage not “north.” There is actually conflict in the two primary historical documents regarding how many people were in the caravan which Armijo led as “Commandant.” One account says “thirty-one” and another says “about sixty.”</p>	3.7	Section 3.7 has been further refined to address OSNHT.

Comment Summary	Section	Response
<p>“This route was apparently only used once with later routes of the OST farther to the north given preference.”</p> <p>a. This is misleading and an erroneous reading of the Armijo account. Armijo states in his account that “I returned on March the first by the same route with no more mishap the loss of tired animals, until I entered the Navajo country, by which nation I was robbed of some of my animals ... .” Armijo states he use the same route to return to New Mexico which means that the route was used by him at least twice. It is significant in the understanding the entire OSNHT trail why the “Armijo Route” was apparently not used for caravans after 1829-30. The Armijo Route is an inseparable part of the historic whole.</p>	3.7	Section 3.7 has been further refined to address OSNHT.
<p>“The location of this route within the GRRRA has never been verified on the ground and its actual location may or may not be co-located with the GRRRA.”</p> <p>a. Of the 2700 miles of designated OSNHT, none have been “verified on the ground.” Ground verification is irrelevant to the legal designation of the OSNHT. The rule of law places the Armijo Route of the OSNHT within the Glade Run Recreation Area. This language in the EA is apparently intended to diminish the BLM responsibility to manage and protect the OSNHT as a “co-administrator” along the entire 2700 mile length and all routes, and where the legally designated trail is on the BLM to administered public lands, it has an affirmative responsibility to manage and protect as directed by law. The law dictates that the OSNHT is “Co-located” in the GRRRA. The BLM Farmington evasion of its responsibilities to manage the OSNHT corridor as a component of the National Landscape Conservation System at some point must be considered “mismanagement.”</p>	3.7	Section 3.7 has been further refined to address OSNHT.
Complete a route inventory.	2.1.3	Section 2.1.3 documents the current inventory for the GRRRA.
BLM has obviously not adequately mapped the existing roads and have not inventoried all of the Cliffhanger trails. Without knowledge of the trails someone reading the draft EA would not know what the impacts are to the existing trails in the current Open OHV area. And with Alt A there are impacts but they are not described.	2.1.3	Section 2.1.3 documents the current inventory for the GRRRA. Through this planning effort, additional routes were proposed by members of the public. These routes are further documented in sections 2.4, 2.5 and 2.6 and analyzed in section 3.11.

Comment Summary	Section	Response
<p>It appears that only one single-track motorized route has been designated on the West side of the GRRRA which is a one-way-out and one-way-back trail. This routing completely removes the long held (more than 45 years) full loop opportunity for single-track motorized recreation in the Glade. Additionally this plan contradicts the exact issues brought to light by single-track motorcyclists regarding potential "head-on" travel issues we have acted to get minimized.</p>	<p>2.4, 2.5, 2.6</p>	<p>The alternatives proposed in Chapter 2 provide a variety of trail system alternatives including keeping the single track as a motorized/non-motorized trail.</p>
<p>Almost 65% of the fully developed trails in the GRRRA, which were all developed by single-track motorized recreation dating back to 1963, have now been captured in the proposed "RMZ 1 Quiet Zone" recreation area. How can this be justifiable? A huge number of local constituents use the trails that are now proposed for the "Quiet Recreation Area" for motorized single-track recreation and have for as long as they have been developed. Where are they to recreate close to their homes in the Northern part of Farmington?</p>	<p>2.4, 2.5, 2.6</p>	<p>The alternatives proposed in Chapter 2 provide a variety of trail system alternatives including keeping the single track as a motorized/non-motorized trail.</p>
<p>13 mile trail (Westside RAR) is extremely overused and much has been destroyed as single track by large trucks and ATVs</p>	<p>3.10</p>	<p>The alternatives proposed in Chapter 2 provide for a variety of actions that could reduce the footprint of over used or inappropriately used trails including, but not limited too, closing the route, reclaiming portions down to the designated corridor width, and installing restriction devices.</p>
<p>4 wd vehicles have encroached onto every single track trail for all major roads. It's ugly and deteriorates the asset. Motorized vehicles fundamentally change the characteristics of a trail.</p>	<p>3.10</p>	<p>The alternatives proposed in Chapter 2 provide for a variety of actions that could reduce the footprint of over used or inappropriately used trails including, but not limited too, closing the route, reclaiming portions down to the designated corridor width, and installing restriction devices.</p>
<p>Motos and bikes don't belong on the same trails - causes public safety concerns.</p>	<p>3.10</p>	<p>The alternatives proposed in Chapter 2 provide for a variety of shared and/or single use trails.</p>

Comment Summary	Section	Response
I have noticed more conflicts with OHVs and extreme widening of the trail. Exclude OHVs from accessing the trail system	3.10, 3.11	The alternatives proposed in Chapter 2 provide for a variety of shared and/or single use trails.
Miles of illegal and legal roads have fragmented the area. Recreationists vie for opportunities within an industrialized oil and gas field. Illegal activities including dumping and shooting are common in the GRRRA.	Chapter 2, 3.10, 3.11	The alternatives proposed in Chapter 2 provide for a variety of actions that could reduce the footprint of over used or inappropriately used trails including, but not limited too, closing the route, reclaiming portions down to the designated corridor width, and installing restriction devices.
Recreationists want an unregulated experience.	Chapter 2, 3.10, 3.11	Alternatives proposed in Chapter 2 provided for a variety of experiences including unconfined recreation opportunities.
Dumping of trash is occurring along all routes, everywhere.	3.10	The route evaluation form takes into consideration routes that allow access to inappropriate activities including dumping and shooting.
The word conflict is in the EA 31 times, however the EA does not quantify these conflicts and it does not show an analysis of this conflict. I find no definition nor any attempt to work with county and state law enforcement on the matter of "conflict." But most alarming, there is no legal standard to guide BLM on any management action.	General	BLM does not have the authority to manage user conflict. Chapter 3 has been updated to reflect decisions that BLM can make.

Comment Summary	Section	Response
User conflicts do not occur.	General	BLM does not have the authority to manage user conflict. Chapter 3 has been updated to reflect decisions that BLM can make.
Furthermore, please recall, pre-decision occurs when an agency commits to a course of action before an analysis is done. We have conducted research into incidents occurring at GRRR reported to San Juan County Sheriff's office and learned that one incident had been reported in the last 20 years. 3 We have provided the literature on recreational "user conflict." It tells us that the uses are not incompatible, but rather it is an individual's intolerance for different lifestyles that is the issue, a subject far outside BLM jurisdiction. In other words, we have done the analysis and it does not call for BLM's action of segregating users because of activity or personal values. BLM failed to conduct any sort of research into this at all; neither in the literature explaining ephemeral recreational conflict or into conflicts reported to local law enforcement. Hence, BLM did no analysis. Therefore, the proposal that users must be separated because of "user conflicts" is predecisional. BLM committed to a course of action before any analysis was done.	General	BLM does not have the authority to manage user conflict. Chapter 3 has been updated to reflect decisions that BLM can make.
Conflicts do not occur between mountain bikes, equestrians, and hikers on the same trails	3.11	BLM does not have the authority to manage user conflict. Chapter 3 has been updated to reflect decisions that BLM can make.
Motorized users rarely see mountain bikes on trails.	3.11	BLM does not have the authority to manage user conflict. Chapter 3 has been updated to reflect decisions that BLM can make.
Conflicts occur between motorized and non-motorized uses	3.11	BLM does not have the authority to manage user conflict. Chapter 3 has been updated to reflect decisions that BLM can make.
Horses, walkers/runners, mountain bikers and all other non motorized users deserve a place to call their own without the noise, smell and getting run off the trails.	3.11	The alternatives proposed in Chapter 2 provide for a variety of shared and/or single use trails.
Signage is ignored.	Appendix C	Appendix C will be the sign plan for the GRRR.

Comment Summary	Section	Response
Section 3.9.1 copied from another EA.	3.10	BLM error, section 3.10 has ben updated.
BLM has not met it's responsibilities to maintain rangeland health.	3.12	Section 3.12 has been updated to include information related the current rangeland health standards.
The Glade should be managed to bring revenue to the area.	3.11	The GRRRA doesn't meet the current standards to become a fee area (section 1.7). If additional development occurs, this decision can be re-considered.
Motorized riders have increased; perhaps by as much as 27%.	3.11	Section 3.11 discusses the increase in all recreation activities over time.
Executive Order 12898 requires federal agencies to consider disproportionate environmental impacts to minority and low-income populations. It is not optional for the EA to not include EJ in the analysis.	3.14	Section 3.14: Environmental Justice has been added to this document.
To begin with, the GRRRA has no permanent water. The main wash only runs water for a short duration after a major weather event. Average rainfall is less than 10 inches per year. Downstream water quality is not affected by the routes in the GRRRA watershed.	3.2	A water resources section has been added to this document.
This document has no mention of commercial uses	3.10, 3.11	A variety of sections mention commercial activities including oil and gas use and grazing.
The cumulative impacts of all of the alternatives entail some fairly complex law enforcement requirements. The EA has not discussed this difficult aspect. There isn't enough enforcement now, people still use firearms and discard trash by the truckload. How will you enforce more stringent use segregation?	1.7	Section 1.7 discusses why a law enforcement plan is not practical to include as part of this planning effort. With the designation of trails and the development of additional infrastructure, law enforcement and the public will benefit by having more clear information.

Comment Summary	Section	Response
<p>The EA is totally deficient and devoid of legal integrity without VRM classifications and an analysis on the EA of visual/scenery impacts as they pertain to recreation and user experience. This is a significant oversight where no VRM discussion/analysis is brought forward in the Action Alternatives. The BLM has the legal responsibility for landscape protection issues as part of FLPMA....Visual Resource Management and Scenery Management are critical elements of BLM's responsibility to manage GRRRA. It is a fatal flaw of the EA not to include analysis of VRM and Scenery Management.</p>	1.7	<p>VRM in the Farmington Field Office is currently going through an amendment process to update the RMP. The GRRRA R&amp;TMP will adopt the decisions made from the VRM planning process.</p>
<p>The information presented doesn't address the current conditions in the Glade because there is no layer reflecting existing roads and developments, particularly for oil and gas development.</p>	Section 2.1.3	<p>An inventory of the GRRRA is presented in section 2.1.3 and includes a map of routes inventoried.</p>
<p>Since 1996, the GRRRA has been the subject of significant controversy. Public safety issues have come to a head (including a 2002 human fatality where a car ran over a wellhead in the GRRRA), numerous altercations between OHV/ATV users and non-motorized recreationists, illegal shooting; hundreds of illegal dump sites are found in the GRRRA; urban interface issues have increased; hundreds of miles of unpermitted roads and pipeline Right of Ways (ROWs) associated with oil and gas industry facilities are evident; overextended and lacking law enforcement have left the GRAA a proverbial battle zone; the landscape of the GRRRA is marked by starkly degraded land health standards (soils, erosion, sediment transfer) including many areas devoid of vegetation; and poor and/or nonexistent inventories of BLM managed resources have limited BLM's analysis of the area.</p>	General	<p>Chapter 3 has been updated.</p>

Comment Summary	Section	Response
complete 100% inventory of all resources within RMZ 3	Throughout	An inventory was completed following the protocol outlined in section 2.1.3
Despite the noted Purpose and Need of the EA to protect valuable cultural and natural resources, BLM has not even provided accurate inventories of what those resources are, let alone whether impacts are adverse.	Throughout	BLM utilized the most current inventory data available for all resources found within the GRRRA.
where EA has not effectively analyzed the impacts and developed management actions to mitigate of an open area: CAA-MA-5, 6, 8, 9, 14, 15, 16, 19, and 36	Throughout	New projects and development in the GRRRA such as oil and gas well pads, new trail development, or re-routes would require additional NEPA to determine the impacts those activities may have on the local resources and would be completed at the time a project is proposed.
The degraded environment of the Glade is not a planning problem, it's an enforcement problem.	Throughout	Degradation to the GRRRA is both a planning and enforcement problem. The GRRRA R&TMP has been developed to better manage the resources within the GRRRA and ultimately impacts to resources.
The absence of sufficient information to support use of OHVs under any alt will continue to degrade the critical soil, air, water, wildlife, and cultural resources that BLM is charged to protect.	Throughout	43 CFR 8340 authorizes BLM to consider and plan for OHV use.
<p>ERROR: The agency only discloses and analyzes only a portion (OHV recreation) of the impacts in this Recreation and Travel Management Plan. They have omitted significant portions of the potential resource use aspects (i.e. non-motorized recreational, traditional, casual, agricultural, commercial, and educational) and the accompanying modes and conditions of travel on public lands.</p> <p>DISCUSSION: As an EA supporting a Recreation and Travel Management Plan, the agency very pointedly defines a larger scope than just OHV management in the planning area. They repeatedly describe the larger scope in the introductory sections of the EA...Yet the agency does not cover the wider array of potential impacts in describing the alternatives in the Affected Environment and Environmental Consequences section of the EA. As we explore each of the subsections, we don't see analysis of the non-motorized recreation impacts and the impacts of other planning area activities.</p>	Throughout	The scope of the NEPA document is to analyze impacts from the propose Recreation and Travel Management Plan and any alternatives on resources and resource uses in the analysis area. Relevant impacts from other activities are captured in the description of the Affected Environment or in the cumulative impacts analysis.

Comment Summary	Section	Response
<p>Route selection criteria applies only to OHV. Other means of travel are omitted. This implies that other means of travel do not have impacts. This is incorrect. We recommend for your reference a synthesis prepared by William L. Gaines et al, for the Pacific Northwest Research Station (USDA) entitled "Assessing the Cumulative Effects of Linear Recreation Routes on Wildlife Habitats" published in November of 2003.</p>	<p>Throughout</p>	<p>The Route Evaluation Form does apply to all route (linear) features inventoried including those that are created by or for non-motorized uses.</p>
<p>Impacts to motorized and non-motorized experiences need to be managed separately.</p>	<p>Throughout</p>	<p>The most current information available was utilized to determine impacts from both motorized and non-motorized uses. Some impacts were combined and some separated out, depending on the resource impacted.</p>

Comment Summary	Section	Response
<p>BLM's analysis of cumulative impacts for each resource in the Affected Environment/Environmental Consequences chapter of the EA hardly passes the "hard look" requirement necessary for NEPA compliance.</p>	<p>Throughout</p>	<p>The BLM followed guidance in BLM Handbook H-1790-1: National Environmental Policy Act Handbook. The Handbook does not require cumulative impacts to be analyzed in their entirety as opposed to broken out by resource. In fact, several statements indicate that the analysis can be done separately for each resource:</p> <ul style="list-style-type: none"> <li>-Determine which of the issues identified for analysis may involve a cumulative effect (page 57).</li> <li>-We recommend that you establish and describe the geographic scope for each cumulative effects issue...The geographic scope will often be different for each cumulative effects issue. (page 58).</li> <li>-Timeframes, like geographic scope, can vary by resource (page 58).</li> <li>-The cumulative effects analysis considers past, present, and reasonably foreseeable future actions that would affect the resource of concern within the geographic scope and the timeframe of the analysis (page 58).</li> <li>-for each cumulative effect issue, analysis the direct and indirect effects of the proposed action and alternatives together with the effects of the other actions that have a cumulative effect (page 59).</li> <li>-The effects analysis must address direct, indirect and cumulative effects related to each issue (page 81).</li> </ul>
<p>The R&amp;TMP EA should discuss unavoidable adverse effects.</p>	<p>Throughout</p>	
<p>Cultural Resources 3.6.3: direct and indirect impacts statement is incorrect. <i>Under this alt. all recreation activity would be restricted to designated routes.</i> This is not true in RMZ 3 (open area). Evaluation is incomplete and more discussion is required. Similar statements can be found in every identified resource</p>	<p>Throughout</p>	<p>Section 3.7, Cultural Resources has been updated.</p>

Comment Summary	Section	Response
Cumulative impacts are not adequately addressed. Several other activities are occurring in the Glade Run area such as Oil and Gas development and consideration of approval of additional transmission lines. The inter-relationship of these activities must be specified.	Throughout	Additional information has been added throughout the document to address cumulative impacts and other resources not initially addressed.
Cumulative Impacts According to the unsigned FONSI for the GRRR R&TMP EA, the EA is purported to disclose that there are no other connected or cumulative actions that would cause significant cumulative impacts in the project area. There is no map of oil and gas activities in the project area, no analysis of urban interface issues, no analysis of known proposed transmission projects (such as TriState San Juan Basin Energy Connect), no GIS mapping/inventories of vegetative cover or archaeological sites, and no overall conclusive cumulative impacts analysis to be found in the EA.	Throughout	Additional information has been added throughout the document to address cumulative impacts and other resources not initially addressed.
it was expected that the BLM's GRRR R&TMP EA would be a thorough and complete analysis where national and/or regional guidance on travel management planning would be sought out and incorporated. Unfortunately, the EA fails to meet the stated Purpose and Need and would not adequately resolve conflicts inherent in the GRRR with enforceable management actions, would not protect valuable cultural and natural resources, and provides no holistic management frameworks.	Throughout	BLM feels that the GRRR R&TMP provides a wide range of alternatives that would adequately manage and protect the GRRR now and for future generations.
it seems clear the OHV adverse impact exceeds that of overgrazing.	Throughout	The most current information available was utilized to determine impacts from both motorized and non-motorized uses.
Alt a and B have the same management prescriptions but only in B are their negative impact noted.	3.1	All of Chapter 3 has been updated to better reflect levels of impact across all alternatives.
The degree to which travel-related activities adversely affect soil stability, vegetation, and water quality is related to the type and amount of traffic that occurs: i.e., routes with higher levels of motorized use cause more sedimentation and require more maintenance to control erosion than routes with lower levels of non-motorized use. T	3.1	Soil Resources have been updated to include additional information (Section 3.1).

Comment Summary	Section	Response
There is not even a mention of any non-recreation activities and no specific separation of motorized versus non-motorized route impacts in the soils analysis.	3.1	Soil Resources have been updated to include additional information (Section 3.1).
GRRRA-CAA-MA-2: need to evaluate impacts of OHV loop on soil and other resources	3.1	Soil Resources have been updated to include additional information (Section 3.1).
<p>Impacts to soil resources would remain unchanged from current conditions. This would include continuing soil erosion and subsequent sediment delivery to drainage systems, soil compaction, and a loss of productivity from the sites disturbed. Mechanical disturbance from OHV activities results in destruction of soil aggregates, compaction of the soil, formation of channels, and sloughing of washes. These same impacts occur from non-motorized activities also but usually to a lesser degree. This description is irrational in light of the EAs own description of the soils (see footnote #2, and check the EA). It needs to be revised appropriately, so that it describes the actual possibilities for water erosion, not the assumption that water erosion will occur even though the EA tells us that there is little to no water erosion hazard. It should also be self-evident that on roads and trails, the product is the road and trail. The soil will of course be compacted. Soil productivity is a term used in conjunction with growing vegetation for commercial applications (for example, forestry). Even if we stretch the definition to include the simplest idea--that of simply growing vegetation -- the fact is that the existing vegetation and topography limits the vehicle and mechanized activity to the already existing routes. Thus the mechanical disturbances are limited to the routes.</p>	3.1	Soil Resources have been updated to include additional information (Section 3.1).
<p>For erosion and road effects, Lee MacDonald and John Stednick prepared a synthesis called "Forests and Water: A State of the Art Review for Colorado," for the Colorado Water Resources Research Institute also 2003. We are sure that New Mexico has water conservation districts and water resources research agencies which may have prepared similar syntheses, however, these are citations that are recent and easily obtainable and very likely the outcomes described will be similarly transferrable to GRRRA, because the whole of western Colorado is of the same high-desert environment as the GRRRA. At any rate they are good examples of professional work appropriately applied.</p>	3.1	Section 3.1: Soils has been updated.

Comment Summary	Section	Response
<p>Erosion is caused by the impact of rain drops striking bare soil. The type of traffic on the bare trail surface has no effect on the levels of water erosion. Mechanical soil movement off of a linear disturbance (trail or road) is mitigated by the surrounding vegetation that filters the solids and slows the flow of the water, allowing the particulates (dirt) to drop out of suspension in the runoff water. Thus motorized traffic and non motorized traffic have the same impact on water erosion. Motorized traffic has more effects going uphill, and non-motorized traffic has effects going downhill. Mechanized traffic has effects in both directions. Yet all have their own effects because they all result in bare soil.</p>	3.1	Soil Resources have been updated to include additional information (Section 3.1).
<p>contends that the soil erosion potential is slight to none under OHV use. The EA says that the level of soil erosion for motorized use cause more erosion than non-motorized use. this statement is irrational.</p>	3.1	Soil Resources have been updated to include additional information (Section 3.1).
<p>Long-term impacts of this alternative include potential soil erosion from unlimited activity in the open area, activity on both two track and single track routes that are regularly monitored and maintained, and the construction of facilities. Potential erosion from the alternative is an undefined portion of total soil erosion resulting from natural geologic erosion, erosion from other valid existing rights such as oil and gas development. and erosion from authorized grazing.(emphasis added) This analysis says that the impacts from recreation are undefined. The analysis has apparently failed to quantify whether the erosion from the routes is any greater or lesser than background erosion. There is no scale of effects defined (For example, what percentage of the land base does the footprint of the route system occupy. In most urban/wild land interface areas it is usually about 4/10ths of one per cent. That means that 99.6 per cent of the land is untouched by the route-based activities. That is a very small scale effect.), nor is there any comparison to known effects of other activities such as grazing, oil and gas development, etc. Therefore, no conclusion about soils impacts can be drawn from this EA, and the deciding officer cannot use soils impacts as a rationale for a decision.</p>	3.1	Soil Resources have been updated to include additional information (Section 3.1).
<p>OHV impacts will permanently impair the scenic vistas, threaten water supplies through erosion, and will likely contribute to desertification process if drier weather persists.</p>	3.1	Soil Resources have been updated to include additional information (Section 3.1).

Comment Summary	Section	Response
There is insufficient information on soil loss to determine whether or not there are significant impacts.	3.1	Soil Resources have been updated to include additional information (Section 3.1).
There is no mention of any non-recreation activities and no specific separation of motorized versus non-motorized route impacts in the vegetation analysis.	3.2	Section 3.3: Vegetation has been updated.
The degree to which travel-related activities adversely affect soil stability, vegetation, and water quality is related to the type and amount of traffic that occurs: i.e., routes with higher levels of motorized use cause more sedimentation and require more maintenance to control erosion than routes with lower levels of non-motorized use. To begin with, the GRRRA has no permanent water. The main wash only runs water for a short duration after a major weather event. Average rainfall is less than 10 inches per year. Downstream water quality is not affected by the routes in the GRRRA watershed.	3.2	
There is insufficient information on vegetation change to determine whether or not there are significant impacts.	3.2	Section 3.3: Vegetation has been updated.
Site-specific analysis needs to occur for the Cliffhanger Trailheads and Trails due to the unique impacts of vehicle traveling on cliff and rock features. This includes site-specific archaeological and biological surveys.	3.2	Section 3.3: Vegetation has been updated.
OHV impacts will ...likely contribute to desertification process if drier weather persists.	3.2	Section 3.3: Vegetation has been updated.
There is no mention of any non-recreation activities and no specific separation of motorized versus non-motorized route impacts in the weeds analysis. Given the subject matter and potential transportation and dispersion vectors, this omission is particularly troubling.	3.3	Section 3.4: Noxious Weeds and Invasive Species has been updated.
There is insufficient information on noxious weeds and invasive species to determine whether or not there are significant impacts.	3.3	Section 3.4: Noxious Weeds and Invasive Species has been updated.
The No Action Alternative could contribute minimally to potential cumulative invasive, non native species impacts. The weeds report indicates that the sources of infestation are not directly related to recreation activities. Therefore, no negative conclusion about weed impacts can be drawn from this EA.	3.3	Section 3.4: Noxious Weeds and Invasive Species has been updated.

Comment Summary	Section	Response
<p>Wildlife 3.4.1. Affected Environment</p> <p>The studies cited in this section are not appropriate to this planning area or to the existing or the proposed management plan (all traffic is and will be restricted to designated routes). The writings are over 30 years old and set in the desert of southern California, just outside greater metropolitan Los Angeles. All the studies were of intense, unregulated OHV activities prior to the use of mufflers on OHVs. Unfortunately they have been long discredited by subsequent research and later events. For example, Mr. Wilshire was fired from his job at USGS for research fraud related to the references cited. Bondello and Brattstrom actually constructed a fake scenario to create the negative effects that they speculated might happen, but never described anything that actually happened in any field study. In the Wienstein work, it is self-evident that the riparian area would be less populated by wildlife if any type of intense human activity took over. There was nothing special about the fact that it was vehicular activity. Simply having so much intense human activity in a limited area will displace the wildlife. There are many more current studies, principally from the U.S. Forest Service Research Stations, which provide more accurate research and a number of solutions for allowing recreation and wildlife to coexist. One of the main tools for successful coexistence is restricting all travel (including pedestrian travel) to designated routes. Based on the references cited, no conclusion about wildlife impacts can be drawn from this EA, and the deciding officer cannot use wildlife impacts as a rationale for a decision.</p>	3.4	Section 3.5: Wildlife has been updated.
<p>Wildlife – The agency actually describes, at least in general qualitative terms, some of the impacts expected from all of the various users in the planning area. This makes this section highly unique as it is the only section (along with the companion Special Status Species section) to meet even the most basic standards the agency set for itself in the beginning of this document. It is educational to note that the agency admits that any decrease in wildlife impacts resulting even from the preferred alternative would be difficult to discern against the backdrop of the other uses in the area:</p>	3.4	Section 3.5: Wildlife has been updated.
<p>Recreational use will adversely affect wildlife and their habitat.</p>	3.4	Section 3.5: Wildlife has been updated.

Comment Summary	Section	Response
There is insufficient information on wildlife to determine whether or not there are significant impacts.	3.4	Section 3.5: Wildlife has been updated.
It is also important to note that the cumulative impacts from all three of the action alternatives are identical even though the range of route mileage being eliminated varies significantly. This strongly implies that route closures are a very high price to pay for negligible or even undetectable return but the document does not disclosed enough information to render a conclusion.	3.4	Section 3.5: Wildlife has been updated.
The special status species section was also written by the same wildlife biologist as the Wildlife section who took the same approach to meeting the requirements of the EA in this section.	3.5	Section 3.6: Special Status Species has been updated. In addition, section 2.3.3 provided additional protection measures.
There is no map or explanation of how authorized routes and open areas relate to areas of special status species.	3.5	Section 3.6: Special Status Species has been updated. In addition, section 2.3.3 provided additional protection measures.
There is insufficient information on special status species to determine whether or not there are significant impacts.	3.5	Section 3.6: Special Status Species has been updated.
The EA is ambiguous about whether there is critical habitat or listed species that would be adversely affected. The EA needs to be clarified in order for the veracity of this conclusion to be accepted.	3.5	Section 3.6: Special Status Species has been updated.
The cultural section only discusses road and trail activity. It makes no distinction between motorized and non-motorized activities.	3.6	Section 3.7: Cultural Resources has been updated.
Cultural surveys, including archaeological sites and TCPS, are required to assess impacts to cultural resources and sites need to be assessed for NRHP eligibility.	3.6	Section 3.7: Cultural Resources has been updated.

Comment Summary	Section	Response
Despite the BLM being formally notified about the impacts of GRRRA archeological site destruction from OHVs/ATVS, the BLM simply decided to take no management action. BLM now wants to manage the GRRRA when only 12-13% has been inventoried for archaeological resources. That is simply unacceptable and renders the entire GRRRA R&TMP EA worthless.	3.6	Section 3.7: Cultural Resources has been updated.
The proximity to historic and cultural resources needs to be specified in the decision. The document states that are “between 197 and 302 archeological sites within the areas that have been inventoried between 12 and 13%.” There is no assessment of the National Register eligibility of these sites and no assessment of the differential impacts that are taking place under the no action alternative or other alternatives. ...	3.6	Section 3.7: Cultural Resources has been updated.
A cultural resource survey across the project area within half-mile corridor where the OST is though to lie should occur.	3.6	Section 3.7: Cultural Resources has been updated.
Impacts to the OST need to be analyzed including erosion, soil loss, vegetation cover, water quality, spread of noxious and invasive weeds, and air quality and impacts from recreation.	3.6	Section 3.7: Cultural Resources has been updated.
There is insufficient information on cultural resources to determine whether or not there are significant impacts.	3.6	Section 3.7: Cultural Resources has been updated.
If the Alternative only reduces the amount of user created routes, but does not eliminate them, then significant impacts and damage could occur to archeological resources and National Register eligible sites.	3.6	Section 3.7: Cultural Resources has been updated.
Site-specific analysis needs to occur for the Cliffhanger Trailheads and Trails sue to the unique impacts of vehicle traveling on cliff and rock features. This includes site-specific archaeological and biological surveys.	3.6	Section 3.7: Cultural Resources has been updated.
The paleontology section only discusses travel system activity. Again, it makes no distinction between motorized and non-motorized activities.	3.7	Section 3.8: Paleontology has been updated.
There are few places in the four corners we (ATV) can legally ride.	3.11	In addition to the GRRRA, there are other recreation specific areas that are open to OHV use including the Dunes OHV Area.

Comment Summary	Section	Response
There is a potential to lose a large portion of single-track motorized trails.	2.4, 2.5, 2.6	Chapter 2 provides for a variety of transportation systems, including the No Action Alternative that would not result in a change to the current designations.
The lack of a trail for single-track users will result in long-term public disobedience.	3.10	Chapter 2 provides for a variety of transportation systems, including the No Action Alternative that would not result in a change to the current designations.
Route proliferation is an indication of demand outstripping supply. It indicates that the existing route system is inadequate.	3.10	Chapter 2 provides for a variety of transportation systems that include expanding the amount of designated routes for OHV use.
The Proposed single-track trail on the west side of the Glade has little recreational value to motorcycles and very little single-track characteristics.	3.10	Section 2.3.3 provided for a range of options to reclaim routes back to their preferred width including, but not limited to, re-routing portions to more desirable locations, and reclaiming back down to the designated width.
4-wheeled vehicles drive on the single track trails and OHVs widen the trails.	3.10	Section 2.3.3 provided for a range of options to reclaim routes back to their preferred width including, but not limited to, re-routing portions to more desirable locations, and reclaiming back down to the designated width.
The Open area provides cross-country experiences for the community.	3.10	Only one alternative takes into consideration closing the Open Area.
Alternative A will result in the same experiences for non-motorized users as what occurs now.	3.11	BLM feels that the GRRR R&TMP provides a wide range of alternatives that would adequately manage and protect the GRRR now and for future generations.
SJTR proposed trail loops would provide a highly sustainable, high-quality recreation opportunity for all single-track motorized users.	3.10	New proposals have been taken into consideration in Chapter 2 and further analyzed in section 3.10.

Comment Summary	Section	Response
Long loops will be the most desirable in terms of single track motorized users having both the length and quality of experience.	3.10	New proposals have been taken into consideration in Chapter 2 and further analyzed in section 3.10.
Alternative A overemphasizes non-motorized recreation and eliminates a substantial amount of existing motorized recreation.	3.10	Alternatives are developed to provide for a range of uses and experiences. While each alternative does have a focus, each alternative is also significantly different from all other alternatives.
Alternative B also meets the need for recreation near urban centers and also is consistent with the current “niche” of the area. Alternative B would include not insignificant reductions in OHV use (40% closed) while also providing much in the way of exclusive non motorized recreation opportunities.	3.10	Alternatives are developed to provide for a range of uses and experiences. While each alternative does have a focus, each alternative is also significantly different from all other alternatives.
Alternative C would emphasize non-motorized recreation in a way not at all contemplated by the existing management plans. It also departs from the current recreational “niche” of the area. Alternative C fails to meet the need to provide a diverse range of recreational activities.	3.10	Alternatives are developed to provide for a range of uses and experiences. While each alternative does have a focus, each alternative is also significantly different from all other alternatives.
The Preferred Alternative eliminates too much motorized recreation.	3.10	Alternatives are developed to provide for a range of uses and experiences. While each alternative does have a focus, each alternative is also significantly different from all other alternatives.
The route designation criteria creates a series of one way gates that will preclude future trail development and/or re routing existing trails.	3.10	We are uncertain how the route designation criteria creates 'one way gates'? The criteria were developed as a way to collect relevant information about a route so that it could be accurately assessed during travel planning.
Use mitigation such as re-routing, education, signing, and maps to keep as many routes open as possible.	3.11	Chapter 2 provided for a variety of mitigation measures for routes that have been identified for designation even if they conflict with other resources. These measures include education, signs and maps to aid visitors in determining the appropriate use for a given route.

Comment Summary	Section	Response
The impacts description in the recreation section is limited to only that of recreation travel. It does not differentiate impacts by motorized or non-motorized recreation.	3.9	Section 3.11 has been updated.
Only a handful of SRPs are requested of the FFO in the planning area and include several annual competitive events, a number of commercial outfitters, and permits for occasional events. Examples include permits for the Road Apply Rally Mountain Bike Race and Xterra Triathlon. Over the last three years, the Bakersfield FO has issued 7 SRPs that are renewed annually, and two that were one-time events. Unfortunately, many activities that require SRPs occur without authorization, due to a lack of public knowledge about the program, and enforcement difficulty, due to the dispersed nature of BLM managed public lands within the planning area. Another, unrelated document has been used again. The above section is about Bakersfield, California. The statement (3.9.1) has no bearing on the GRRRA and so no alternative comparison can be made to other alternatives using this description of the affected environment. Thus the GRRRA EA does not have an accurate description of the affected environment in the Recreation analysis. The reader and the decision maker cannot make informed comments or informed decisions based on this document.	3.9.1	Section 3.11 has been updated.
3.9.3: Alternative B includes the prohibition on cross country travel and the adoption of a designated trail system for motorized and mechanized visitors. This is the same management prescription as in Alternative A. In Alternative B this same management prescription will have negative impacts on non motorized visitors and adjacent land owners. This is not well reasoned. Essentially the prescription is the same in both alternatives, but one alternative will have negative impacts and the other will not. This discussion must be revised to more clearly differentiate between the two alternatives.	3.9.3	Section 3.10 has been updated.
Alt A OHV use will destroy non-motorized experience	3.11	Alternatives are developed to provide for a range of uses and experiences. While each alternative does have a focus, each alternative is also significantly different from all other alternatives.
Best use of this BLM land is to have the most people getting to enjoy it.	3.9	BLM feels that the GRRRA R&TMP provides a wide range of alternatives that would adequately manage

Comment Summary	Section	Response
Increasing damage caused by motorized vehicle impacts has diminished the quality of the RAR and it's draw of the top riders (mtn bikes).	3.9	BLM feels that the GRRR R&TMP provides a wide range of alternatives that would adequately manage and protect the GRRR now and for future generations.
Concentrated recreation use will decrease the recreation values currently found in the Glade. In the open area, recreational values will likely be obliterated.	3.9	BLM feels that the GRRR R&TMP provides a wide range of alternatives that would adequately manage and protect the GRRR now and for future generations.
GRRR-CAA-G- 1: Zone 1 as shown in Figure 9 will not fulfill the goal of a quality recreation opportunity for those seeking a quiet wild land experience.	3.11	The NRRSM for the GRRR show it to be a middle/front country classification with indicated that there is industrial development and major roads/residential areas within a relatively short distance from the GRRR. The GRRR does not constitute wild lands.
Areas that provide solitude and low levels of use will decrease. This assumption may hold true in the GRRR because it is in an urban interface zone. However, ample opportunity for solitude is available on the millions of acres of BLM- managed high desert environment surrounding the Farmington urban area. Due to its proximity to the urban zone, the GRRR is not suited to quiet use or solitude, and the agency is ill-advised to attempt to provide such an opportunity in this particular planning area.	3.9	While we agree, in general, with this comment that the GRRRs location, industrial and recreation development precludes it from a truly quiet experience, we disagree in saying that no area of the GRRR can support a quiet or solitary experience. Areas that are farther removed from local communities or have relatively limited access would be able to provide more quiet and solitude than areas open to OHV use.
OHVs/ATVs/Rock Crawlers experiences are different from non-motorized quiet recreation opportunities (including. hiking, biking, walking).	3.9	BLM agrees with this statement.
Alt. B best serves the public and their families in recreational activities of all kinds.	3.9	BLM feels that the GRRR R&TMP provides a wide range of alternatives that would adequately manage and protect the GRRR now and for future generations.
restricting riders to a small area will ruin your riding experience due to the fact that you will spend all your time avoiding people.	3.9	BLM feels that the GRRR R&TMP provides a wide range of alternatives that would adequately manage and protect the GRRR now and for future generations.
Segregation will result in user conflicts.	3.9	BLM has no authority to manage for user conflict.

Comment Summary	Section	Response
<p>Conflicts between recreation uses will increase. The assumption that conflicts will increase is speculative and according to history, inaccurate. As noted above, over the past 20 years only one conflict of any kind has been reported to the San Juan County Sheriffs Office (or any law enforcement agency). This single incident is nowhere near enough data to forecast a trend. There is no record of any other conflict. There is no BLM duty to act triggered in the matter of user conflict.</p>	3.9	BLM has no authority to manage for user conflict.
<p>EA doesn't quantify conflicts and fails to show an analysis of what conflicts are. There is no legal standing to guide management action to address conflict.</p>	3.9	BLM has no authority to manage for user conflict.
<p>A developed system will create more opportunity for more formalized events</p>	3.11	BLM feels that this would be a positive outcome of the GRRR R&TMP.
<p>5. 3.9 Recreation, 3.9.3. Impacts from Alternative A, says that under Alternative A, user conflicts will continue to be an issue where there is competition for non-motorized use and motorized use on roads and trails. Also that there will be major long-term adverse effects on non-motorized users, and private landowners regarding trespass, and noise associated with OHV use, and that this is due to the size of the designated OHV area. These statements make it apparent that nothing will change under Alternative A</p>	3.9	Section 3.11: Recreation has been updated. In addition, noise is addressed in Section 1.7.2.
<p>The impacts "analysis"/description in the livestock grazing section is limited solely to a discussion of the impacts of recreation use on grazing in the planning area. It does not discuss, in any form, the impacts that grazing has on the planning area under the alternative. The impacts that the various uses have on the planning area under the various alternatives is, after all, what is supposed to be examined in this document.</p>	3.10	The scope of this NEPA document is to analyze the impacts of a Recreation and Transportation Management Plan. It is not within the scope of the document to analyze the impacts of livestock grazing on recreation or travel management because no livestock grazing decisions are being authorized. Additional information related to grazing can be found in Section 3.12
<p>Conflicts and impacts to grazing are not clearly evaluated.</p>	3.12	Section 3.12: Livestock Grazing has been updated.
<p>Impacts from livestock grazing are not evaluated.</p>	3.12	Section 3.12: Livestock Grazing has been updated.

Comment Summary	Section	Response
In the social and economics analysis, the agency only describes the “reduction” in dust, noise, vandalism, and trespass (again, all presupposed problems described by the agency and attributed to the no action alternative without one iota of data to substantiate them) resulting from the changes in the motorized use. The agency fails completely to even mention other motorized use, let along non-motorized use on the very same route system.	3.13	Section 3.13: Social and Economic Features has been updated. Additionally, noise is addressed in section 1.7.2.
we need this area for our community and the economy and because this is a great place to ride!	3.13	Section 3.13: Social and Economic Features has been updated.
Economic development for recreation and hunting could be impacted	3.13	Section 3.13: Social and Economic Features has been updated.
Motorized recreation positively contributes to the economy.	3.13	Section 3.13: Social and Economic Features has been updated.
The GRRRA has very important economic value to the Farmington region and must be managed by the BLM for intended recreation purposes, including non-motorized recreation opportunities which are scarce on BLM/FFO lands (the majority of the 1.4 million acres managed by BLM/FFO are open to OHVs and non-motorized recreation designations are a fraction of the acreage).	3.13	Section 3.13: Social and Economic Features has been updated.
The economic analysis is inadequate.	3.13	Section 3.13: Social and Economic Features has been updated.
Open Areas will result in private property trespass.	3.11	The BLM will follow all New Mexico Statutes Annotated as they related to private property trespass ( <i>NMSA 30-14-1</i> ).
Having private property directly adjacent to open use area of RMZ 3 places an undue burden of the property owner. The current open use area (which exists in this area) is neither fenced by BLM nor marked with BLM signage . . .	3.11	The BLM will follow all New Mexico Statutes Annotated as they related to private property trespass ( <i>NMSA 30-14-1</i> ).

Comment Summary	Section	Response
<p>Under Alternative A, user conflicts would continue to be an issue in areas where there is competition for non-motorized and motorized use on roads and trails and at other recreation facilities, such as staging areas. Individual conflicts are temporary and localized, but would continue to have major long-term adverse effects on non-motorized recreationist and private landowners that are negatively impacted by user-created route proliferation, trespass and noise associated with OHV use in planning area. Whereas, impacts to motorized recreationist and OHV recreation would be negligible, even as recreation demand grows, because of the size of the designated OHV route network. This also appears to be from another document; trespass is not brought up as an issue in the GRRRA. OHV activity near private lands in GRRRA is already restricted to designated routes to minimize the effects. We have already noted the size as an issue, but not because the planning area is large, but rather, it is too small to parcel out. Furthermore, the "major long-term adverse effects" to non-motorized recreationists is pure speculation about ephemeral experiences based on philosophical differences, which can easily be remedied by simply avoiding the area of conflict. Please see our prior stated discussion of "user conflicts" in this comment. We would add here that user conflict (unfulfilled visitor expectations and lifestyle intolerance) can be managed using a good education program. The visitor's expectations can be modified in a multiple use recreation setting by proper signing and visitor information. Visitors make conscious decisions on where to recreate based on the desired experience. Urban interface multiple-use opportunities like GRRRA seldom meet the ultimate recreational goals of any of the visitors. GRRRA is valuable because it is an easy access, short duration experience for all visitors. It will not provide the highest challenge, distance, solitude, quiet or orienteering experience for any visitor.</p>	3.10, 3.11	Sections 3.10 and 3.11, Transportation and Recreation, respectively, have been updated. In addition, noise has been address in section 1.7.2
<p>Impacts to Environmental Justice populations were not analyzed.</p>	3.14	Please review section 3.14.
<p>Noise associated with OHVs near populated and residential areas adjacent to the Glade are not evaluated or discussed. This includes addressing noise impacts to RMZ 1.</p>	1.7.2	BLM FFO has a Notice to Leases related to noise decibel limits. This NTL as well as local state/county law are followed as they relate to noise issues. Additional information related to noise can be found in section 1.7.2.

Comment Summary	Section	Response
OHV impacts will permanently...threaten water supplies through erosion	3.2	Please review section 3.2.
Impacts to water resources were not analyzed.		
<p>The degree to which travel-related activities adversely affect soil stability, vegetation, and water quality is related to the type and amount of traffic that occurs: i.e., routes with higher levels of motorized use cause more sedimentation and require more maintenance to control erosion than routes with lower levels of non-motorized use. To begin with, the GRRRA has no permanent water. The main wash only runs water for a short duration after a major weather event. Average rainfall is less than 10 inches per year. Downstream water quality is not affected by the routes in the GRRRA watershed.</p>	Chapter 3	Please review sections 3.1 and 3.2 related to soil and water, respectively.
Impacts to wetlands were not analyzed.	1.7	Section 1.7 discusses that there are no riparian impacts associated with the designated route and trail system.
There is insufficient information on fire hazard to determine whether or not there are significant impacts.	Additional Section	No fire hazards have been identified within the GRRRA
OHV impacts will permanently impair the scenic vistas	1.7	Visual resource management for the FFO is in the process of being amended to update the RMP. At such a time as a VRM decision is made, this document will adopt those management decisions for VRM.
Impacts to visual resources were not analyzed.	1.7	Visual resource management for the FFO is in the process of being amended to update the RMP. At such a time as a VRM decision is made, this document will adopt those management decisions for VRM.
Impacts to oil and gas development were not analyzed.	2.3.1	Section 2.3.1 acknowledges all valid and existing rights, including for oil and gas development.

Comment Summary	Section	Response
<p>The BLM failed to adequately consider ACECs in the project area The location of the River Tract ACEC and East Side Rincon ACEC are not disclosed in the EA. Without disclosure of the relationship it cannot be determined whether the proposed alternatives will not affect the resources for which the ACECs were designated. These are “ecologically critical areas” and the finding of no significant impact cannot be upheld without specifying the relationship between the designated uses and the sensitive resources in the direct and indirect impact area. Furthermore, the threatened and endangered species shown in Figure 25 need to be analyzed with respect to all alternatives. The reasonable and foreseeable impacts on these resources need to be specified.</p>	1.7	<p>No ACECs are included as part of the GRRRA plan. Routes and trails that could potentially impact ACECs were identified for re-assessment following procedures outline in the GRRRA R&amp;TMP.</p>
<p>Removing motorized users will increase trash dumping. Trash is an issue</p>	2.1.3, 2.4, 2.5, 2.6	<p>Routes shown to allow access exclusively to unauthorized activities were documented during on the Route Evaluation Form (Appendix A) and such information was taken into consideration within each alternative (Sections 2.4, 2.5, and 2.6).</p>
<p>Segregation of uses results in protection of the public.</p>	2.4, 2.5, 2.6	<p>Each action alternative provided for a variety of RMZ options.</p>
<p>Reducing areas for motorized recreation will cause problems and safety hazards.</p>	2.4, 2.5, 2.6	<p>Each action alternative provided for a variety of RMZ options.</p>
<p>There is plenty of room for overlapping uses to occur safely.</p>	2.4, 2.5, 2.6	<p>Each action alternative provided for a variety of RMZ options.</p>
<p>None of these alternatives provide for the safety of non-motorized users</p>	2.4, 2.5, 2.6	<p>Each action alternative provided for a variety of RMZ options.</p>
<p>Segregation could reduce safety concerns between mountain bikes and motorcycles.</p>	2.4, 2.5, 2.6	<p>Each action alternative provided for a variety of RMZ options.</p>
<p>Impacts to public health and safety were not analyzed.</p>	Additional sections	<p>Please review section 3.13.</p>
<p>Public safety will be compromised without a buffer zone north of RMZ 1. Otherwise, the public will use Highway 574 to get to RMZ 2.</p>	2.4, 2.5, 2.6	<p>Each action alternative provided for a variety of RMZ options.</p>

Comment Summary	Topic/ Section	Response
<p>At the RAC meeting on Feb. 20, 2013 we were assured by BLM that route identifiers were on the KML files for our reference. In fact no such identifiers are on the KML files posted on the BLM website. The lack of identifiers makes it impossible for the commenter to evaluate the alternatives. In addition, the various colors of routes shown on the KML files are not identified. This makes it impossible for the commenter to differentiate between roads, primitive roads and trails from the data provided.</p>	KML	<p>BLM attempted a new process to allow a larger portion of the public to view data. This was a good faith effort by BLM to provide more information to the public. BLM will continue to utilize new data formats but does acknowledge our failure at provide accurate and useful KML files. As always, member of the public are welcome to request data in a different format.</p>
<p>Further examination of the KML files reveals that the route map was created from digitizing imagery. Experience has taught us that digitized maps have an accuracy rate of about 60%. The decision maker and the public need better data on which to base their comments and decisions. CEQ emphasizes that the information in the document must be of high quality (40 CFR 1500.1 (b)). The map information provided is inaccurate and incomplete. No analysis can be made using the data provided.</p>	KML/ Inventory	<p>Section 2.1.3 discusses how the inventory for the GRRRA was completed including on-the-ground verification of routes, general allignment, and other information necessary to complete the Road National Data Standard.</p>
<p>KMz files don't show trails open to OHV use in RMZ 2 as shown in table 15 and figure 13</p>	KML	<p>KML files are a new file type for the Farmington BLM. As always, member of the public are welcome to request data in a different format.</p>
<p>KML files do not show the proposed boundaries of the Glade and of the RMZs</p>	KML	<p>KML files are a new file type for the Farmington BLM. As always, member of the public are welcome to request data in a different format.</p>
<p>In sum, this document fails to meet the standard implied by 1500.1 (b).</p>	CFR	<p>The GRRRA R&amp;TMP is in compliance with all applicable regulation, laws, and policies.</p>

Comment Summary	Topic/ Section	Response
<p>Land Use Plan amendments require an EIS. It is always possible that we are mistaken in our understanding of federal land planning requirements in law and regulation. However, our understanding is any land use plan amendments (revising programmatic land use plans such as a Resource Management Plan (RMP)) requires the preparation of an Environmental Impact Statement (EIS). This EA describes making several significant changes to the existing Resource Management Plan (RMP) (EA page 4, under “decision to be made”):</p> <ul style="list-style-type: none"> <li>· Designation of a Special Recreation Management Area (SRMA)</li> <li>· Boundary amendments to travel area designations (i.e., open, limited, closed area designations)</li> <li>· Amendments to the GRRRA boundary irrespective of the relative significance of the proposed amendments the agency is required to prepare an EIS if it wishes to make these changes to the existing RMP. The EA attempts to explain on page 5:</li> </ul> <p>(EA page 5) There is a clear distinction between site specific implementation planning that implement the programmatic land use plan and amending the programmatic land use plan itself. The EA attempts to describe significant changes in the programmatic plan as implementation decisions. Simply stating that a programmatic land use plan identifies the need for potential future management actions, including amendments to that plan, does not satisfy the process requirements for actually amending the land use plan.</p>	<p>Planning Regulations</p>	<p>Please see Section III.B. of the Land Use Planning Handbook (H-1601-1) which describes the process for conducting a resource management plan with an associated environmental assessment.</p>

Comment Summary	Topic/Section	Response
<p>BLM cannot sign the FONSI for this legally deficient EA. As we have highlighted above, the EA fails miserably to legally comply with Significance Criteria Context and Intensity and no “hard look” has occurred. Given the Purpose and Need of the EA, BLM has not demonstrated a holistic management framework to respond to increased use, not ensured that the objectives of the GRRRA are met, and does not protect valuable cultural and natural resources. BLM/FFO’s continued failure to monitor and inventory resources, and implement an enforcement program in the GRRRA signifies the lack of willingness to use the tools necessary to proactively manage public land. The BLM/FFO’s poor performance (including a blatant cut and paste from Gunnison, Colorado) on this EA only reinforces the controversy of managing the GRRRA and attempts to put the onus back on user groups to resolve conflicts in this “free-for-all” public lands debacle. Lest there be any doubts about the responsible party for failure here: it is the BLM. The result is that the public citizens of the area, led to believe that the BLM would somehow step up and fulfill their agency duty to manage the GRRRA, are shortchanged. Public citizens groups in the area consider the following “6Ds” approach that BLM seems to dictate actions in Farmington (Deflect, Defer, Deny, Diminish, Delegate, and Discredit). Sixteen years after it was identified that there were public safety and health issues apparent in the Glade, the BLM has not yet figured out how to resolve management and resource issues. While SJCA diverges from other user groups on what constitutes proper use of, and behavior on, public lands, we respect the intent of FLPMA and the opportunity for the public to use public lands. The BLM must either prepare a new EA or an EIS on the GRRRA with proper Cooperating Agencies and national expertise on recreation areas. The current GRRRA R&amp;TMP EA is an insult to the public.</p>	<p>Hard look/Consultation</p>	<p>The GRRRA R&amp;TMP is in compliance with all applicable regulation, laws, and policies.</p>

Comment Summary	Topic/Section	Response
<p>Multiple use of public land is controversial throughout the U.S. in 2013. Competing uses of public land are not always compatible. Resource damage is prevalent on public lands managed by the BLM/FFO. Every public meeting held by the BLM since 1997 on “the Glade” has been contentious and controversial. The public has been patiently waiting for the BLM to craft a NEPA document that provides real solution using the tools and expertise that the BLM has. Instead, the public gets a shoddily prepared disclosure document with no real attempt to address management of the GRRRA and a boilerplate FONSI that some bureaucrat will sign. It is unfathomable that BLM/FFO doesn't acknowledge this controversy as it pertains to the GRRRA R&amp;TMP EA. Controversy alone, as defined by Significance Criteria of Intensity, is grounds for BLM to shelve this EA and start an EIS. BLM has not sufficiently evaluated impacts in the EA in a manner that would allow the GRRRA controversies to be resolved. Nonmotorized recreationists, including mountain bikers, deserve a better plan by BLM to protect users and resources. SJCA is alarmed at the controversial attempt by BLM/FFO to ignore a component of National Landscape Conservation System in the GRRRA R&amp;TMP EA.</p>	Significance	<p>Per BLM Handbook H-1790-1: National Environmental Policy Act Handbook, "You must consider the degree to which the effects are likely to be highly controversial. Controversy in this context means disagreement about the nature of the effects, not expressions of opposition to the proposed action or preference among the alternatives. There will always be some disagreement about the nature of the effects for land management actions, and the decision-maker must exercise some judgement in evaluating the degree to which the effects are likely to be highly controversial. Substantial dispute within the scientific community about the effects of the proposed action would indicate that the effects are likely to be highly controversial" (bolding added). While management of the GRRRA is certainly controversial in terms of opinions as to how the area should be managed, there is not substantial controversy regarding the effects of the proposed management. Thus, the proposal does not meet the controversy criteria for evaluating intensity as a factor for determining significance.</p>
<p>None of the alternatives presented in the EA would result in BLM upholding FLPMA (multiple use) and protecting all users of the GRRRA. I challenge the BLM to prove to me, or any other users, members of the public and the current BLM/FFO Resource Advisory Council (RAC), that the GRRRA does not have significant adverse impacts. As a former member of the BLM RAC in the early 2000's, I provided tours to the RAC and BLM personnel showing the adverse impacts, damage and degradation that existed in the Glade then. Sadly, BLM has not improved their management of this critically degraded resource, the GRRRA.</p>	Significant Impacts	
<p>Despite SJCA noting the need for BLM/FFO to seek out assistance of State BLM/National BLM recreation specialists in crafting this NEPA document, the request was apparently ignored. There are no state, regional or national level BLM personnel in the List of Preparers section of the EA. BLM/FFO staff, although well intentioned, do not seemingly have the professional capacity to evaluate and/or manage the GRRRA.</p>	Consultation/Preparers	

Comment Summary	Topic/Section	Response
The fact that BLM/FFO didn't seek national BLM assistance...in preparation of the EA, short changes the public and minimizes the real aspects of controversy that exists in a recreation area/OHV area/"world class" multiple use trails area (the longest continually run Mountain bike race in the world)/oil and gas field.	Preparers	The GRRR R&TMP has been reviewed at both the state and national levels.
The fact that BLM/FFO didn't seek ...Cooperating Agencies in preparation of the EA, short changes the public and minimizes the real aspects of controversy that exists in a recreation area/OHV area/"world class" multiple use trails area (the longest continually run Mountain bike race in the world)/oil and gas field.	Cooperating Agencies	"Note that the requirement to invite eligible government and tribal entities to become a CA applies to all RMPs and EISs...The requirement does not apply to plan amendments or other activities prepared through an EA, although the CEQ and DOI have affirmed that the CA relationship may also be used for the preparation of EAs." (A Desk Guide to Cooperating Agency Relations and Coordination with Intergovernmental Partners, 2012). The BLM engaged numerous governmental agencies throughout the preparation of the EA (please see section 4.1). The BLM did not determine that offering cooperating agency status would add any additional benefit to their participation in the process and none of these agencies expressed and interest in Cooperating Agency status at any point during the preparation of the EA.
Despite noting the urban interface component of the analysis, BLM generally overlooks the partnerships inherent in providing management solutions for the GRRR.	Consultation/Preparers	Volunteers and partnerships are an integral part of maintaining the GRRR. Provisions to seek out and enhance those assest have been made within Chapter 2.
BLM did not properly consult on this EA with the State Historic Preservation Officer.	Consultation/Preparers	Consultations was done with NM SHPO.
Having an open area is counter to BLM's mission to protect resources.	1.5	43 CRF 8342 requires BLM to consider all area level designations including open areas.
Some potential Recreation Area users have made statements that they 'will not comply with any restrictions placed on their motorized activities.' This threat needs to be taken seriously and most certainly, if carried out would result in both unique and unknown risks.	FONSI	These types of threats would be handled by either BLM rangers or other local law enfocement.

Comment Summary	Topic/ Section	Response
<p>The structure of the RMZs within a SRMA that separates visitors by activity is predecisional. It assumes segregation will be part of the plan, before the plan or analysis is even started. This is a violation of 40 CFR 1506.1. The plan itself segregates individuals as a means of resolving political issues and has no connection to land health. Segregation of activities does not fulfill the purpose and need of providing a quality experience for most visitors. Segregating uses of a trail based recreation opportunity in an urban interface setting at the small scale of the GRRRA guaranties that none of the visitors will achieve the expected outcomes. This fact (the small size of the planning area) must be acknowledged and explored in the discussion, because it would have a significant influence on the outcome.</p>	Predecision	<p>The establishment of RMZ is consistent with BLM Manual 8320 - Planning for Recreation and Visitor Services. It is a common management strategy throughout the BLM. The consideration of a management strategy is not predecisional unless actions are taken to implement the strategy before a decision record is signed.</p>
<p>The EA violated NEPA, FLPMA, NHPA, ARPA, and fails to protect a component of the National Conservation Landscape System.</p>	1.5	<p>The GRRRA R&amp;TMP is in compliance with all applicable regulation, laws, and policies.</p>
<p>Arbitrary boundary changes concerning State of New Mexico managed lands and discussed in the EA are illegal.</p>	FONSI	<p>No boundary changers were made to NM State managed lands. Provisions are made, within the GRRRA R&amp;TMP, to potentially apply for right-of-way routes across NM State lands or to consider other forms of land management options.</p>
<p>The R&amp;TMP EA should discuss irreversible and irretrievable commitments of resources.</p>		<p>A description of irreversible or irretrievable commitments of resources occurs in an EIS when discussing significant impacts. The FONSI attached discloses that no significant impacts were identified; thus, there is no discussion of irreversible or irretrievable commitments of resources.</p>

Comment Summary	Topic/ Section	Response
<p>The agency has missed, by a wide margin, even the mark they set for themselves in the pages of this document, let alone meet minimum NEPA-mandated requirements for analysis. The agency specifically required themselves to analyze not just the OHV impacts of the alternatives, and not even just the recreation impacts of the alternatives but, because this is also a transportation system planning document, the impacts of ALL the various uses occurring within the planning area. The only conceivable method of resolving the gaping deficiency we have identified in the EA is to withdraw the current document, correct the document by rewriting Chapter 3 to include the required analysis and evidence of analysis, and re-issue the document for public review and comment.</p>		<p>The scope of this NEPA document is to analyze the impacts of a Recreation and Transportation Management Plan. It is not within the scope of the document to analyze the impacts of all other activities and authorizations. The impacts of those activities and authorizations are analyzed in their respective NEPA documents. The potential impacts of the allocations or management decision contained in the alternatives are addressed within the GRRR R&amp;TMP. When the impacts of those activities or authorizations contribute to cumulative impacts in relation to the Recreation and Transportation Management Plan, those impacts are captured in the Cumulative Impacts section for each resource or resource use.</p>