

U.S. Department of the Interior
Bureau of Land Management
Farmington District

Appendix G
Comment Response Table

Glade Run Recreation Area
Recreation and Travel Management Plan

DOI-BLM-NM-F010-2013-0197-EA

September 2014

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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

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	Topic	Response
<p>The 2003 RMP states the following: “This area (GRRA) contains a network of established roads, dry washes, and designated trails that provide for a variety of outdoor recreation opportunities”. “Various portions of this network have been ridden by local ORV enthusiasts for over 40 years”. The dry washes within the GRRA have become a huge part of the overall travel network (as supported by the 2003 analysis) and even though not inventoried for Travel Management, they represent a large part of the recreation resource for single-track motorized users. For more than 40 years these “natural occurring” and “naturally replenishing” travel-ways have become an integral part of the network of designated trails. A removal of dry sand washes from recreation opportunity for single-track motorized users would devastate the overall amount of recreation resources available for this group. This is one of those resources that require little if any oversight from the BLM, have not been identified in any study as an environmental issue and their use continues the legacy of their importance to the overall network.</p> <p>Recommendation: SJTR’s requests that dry sand washes be left open for travel, as they have been historically for more than 40 years by single-track motorized users, in all areas where motorized recreation has been authorized. We believe that dry sand washes, as a part of the overall travel network for single-track motorized use, should fall into the same overall scrutiny as all other recreation in the GRRA whereas future travel restrictions could be imposed should the continued use of the resource, by thorough analysis, be deemed harmful.</p>	2		<p>Washes and arroyo have been considered within the Travel and Transportation section 2.4, 2.5, and 2.6. In the preferred alternative, RMZ 3 is opened to motorized travel including the washes. In RMZ 1 the management focus is for non-motorized which limits designation of</p>
<p>I would really like to see better maps and signage of areas as far as I know the BLM still doesn't have a good handout map of the Chokecherry/Glade trail system ,I really believe there needs to be good or at least better handout maps at local motorcycle dealerships.</p>	2.3.1	Maps of area	<p>GRRA-CA-MA-3 has provided for the development and maintenance of recreation and transportation maps.</p>

Comment Summary	Section	Topic	Response
BLM needs to identify and accept the Trail Inventory and the Landing Zones.	2	Submitted trail inventory data	All inventory data submitted by members of the public, government entities, or other organizations have been considered in their entirety. This information provided the basis from which alternatives were developed and routes identified.
The open area and limited use area should be marked clearly with signs for identification and explanation.	2.3.3	Sign placement	GRRRA-CAA-MA- 52 has provided for the installation and placement of signs throughout the planning area. Additionally, a sign plan has been developed for this area (Appendix C).
The kiosk at the entrance should have maps and clear directions and regulations.	2.3.3	Sign Installation	GRRRA-CAA-MA- 52 has provided for the installation and placement of signs throughout the planning area. Additionally, a sign plan has been developed for this area (Appendix C).
There should be a sign at the entrances listing fines for dumping and other destructive activities.	2.3.3	Sign Installation	GRRRA-CAA-MA- 52 has provided for the installation and placement of signs throughout the planning area. Additionally, a sign plan has been developed for this area (Appendix C).
We would like to see a transfer station set up at the entrance.	2	Transfer Station	The installation and operation of a transfer station is outside of BLM's authority. A request would have to be made by the County to establish a transfer station. If this was to occur, BLM would complete NEPA analysis on that request.
I recommend remote RV area North of Brown Springs	2	RV Camping	This planning document includes allocations for the identification and development of designated camping areas (GRRRA-CAA-MA-10). In order to fully assess this request, additional information regarding exact location, development level, and usage is necessary.

Comment Summary	Section	Topic	Response
I recommend game camera use for common dump sites.	2	Trash	Trash and dumping areas identified on BLM lands are reviewed by law enforcement. Installation of game cameras or other types of surveillance equipment would be done at the discretion of law enforcement.
I recommend two trash cleanups a year.	2	Trash Cleanups	BLM does try to host or collaborate with local volunteers to provide opportunities for trash cleanup events. This planning effort incorporates multiple actions to collaborate and partner with local organizations, agencies and volunteers (GRRRA-CAA-MA-49 and GRRRA-CAA-MA-50).
I can find nowhere in the document how these R&PP actions relate to the desired future condition of the Glade Run Special Recreation management Area or improve the protection of public resources in a Transportation Plan for the Area. In fact the absence of these actions in Alternative B (Comparison Table 9, page 31) suggests that this action would be adverse to "OHV recreation opportunities" as summarized in the alternatives on page 30. Conversely it would appear that these actions would be favorable to Alternative C which "emphasize[s] non-motorized recreation" but also favorable under alternative A which strikes a "balance between current recreation and resource protection." I can find no justification for the relationship between the specific R&PP actions and any of the alternatives for the desired future condition of recreation or transportation in the Glade Run.	2, 4	Recreation and Public Purposes Act	The Recreation and Public Purposes Act (R&PP) authorizes the leasing or sale of public lands for recreational or public purposes to certain entities. As the identification of potential R&PP leasable areas are located within a recreation area, R&PP leases would need to enhance recreation values to the community and the GRRRA. This enhancement of recreational opportunities would directly support this planning efforts Purpose and Need (Section 1.3). Section 2.2.1 provides a summary of the alternatives including their over-arching objectives. As noted throughout the document, BLM's current R&PP lease application would more fully support the goals and objectives of Alternatives A and C but not Alternative B.

Comment Summary	Section	Topic	Response
Likewise I can find no clear explication of the basis for establishment of the Recreation Management Zones - they seem to appear with no justification in the table. The lack of a clear discussion of how the eRMZs were established makes the entire document and forecasting effects of the alternatives hard to comprehend.	2	Handbook/ Manual	The BLMs Recreation and Visitor Services Planning handbook (H-8320-1) allow for the delineation of areas within as SRMA as recreation management areas (RMZ). By sub-dividing a large SRMA into smaller areas (RMZs), specific objectives can be defined for targeted recreation an opportunity that, taken as a whole SRMA, allows BLM to better manage diverse recreation opportunities.
The EA does not apply the required "minimization criteria" to minimize impacts on soils, watersheds, vegetation, air, wildlife, visual, paleontological, archaeological resources and historic properties (43 CFR 8342.1 [a] - [c]).	2, Appendix	Designation Criteria	43 CFR 8342 are in fact designation criteria and not "minimization criteria". Section 2.1.3 within the planning document outlines these designation criteria which are reiterated on the Route Evaluation Form found in Appendix A. All designated areas and routes are in compliance with 43 CFR 8342.
It is unclear, even though BLM proposed to close certain routes from recreational traffic in the three new alternatives, it is unclear how these "new alternatives" will be different from the no action alternatives given that no realistic proposal for monitoring, enforcement or funding repair and restoration of damage to resources will be implemented.	1.7.2., Appendices	Monitoring and Maintenance	Appendix D: Trail Monitoring and Maintenance Plan provides for the monitoring and maintenance of designated routes identified within this planning document (GRRR-CAA-MA-34 and 35). Routes identified for reclamation will follow the appropriate procedure as identified in (GRRR-CAA-MA-33). As stated in section 1.7.2 direction regarding law enforcement staffing and priorities is determined at an administrative level.
It is difficult from the EA to distinguish the effects on resources of the no action or the three proposed action alternatives. Using the Comparison Table 9 (page 31) the summary of different objectives of the Action Alternatives and objectives of the Recreation Management Zones must be considered.	2.2.2, 3	SRMA/RM Z	Section 2.2.2, Table 9 does distinguish between the acres allocated to each alternative as well as the acres allocated to each RMZ within each alternative. Further discussion of the impacts that each RMZ area or larger SRMA boundary are discussed throughout Chapter 3: Affected Environment.

Comment Summary	Section	Topic	Response
The Recreation Management Zones are never explained but can only be understood with reference to "objectives common to all alternatives."	2.4, 2.5, 2.6	RMZ	The following sections 2.4, 2.5, and 2.6 provide the management goals, objectives, and actions for each RMZ, respectively.
There should be one synthetic map for each alternatives showing the RMZs and what would be limited and what would be open under each alternative for each recreation activities (foot, horseback, livestock, mechanized, non motorized and motorized). These maps should be displayed with respect to other resources so the effects on "sightseeing" values of recreation under each alternatives might be understood. This overall comparison cannot now be seen.	2.4, 2.5, 2.5	Maps	Further clarification of this comment is needed to more fully understand what types of maps are being requested. Figure 2 in section 2.1.3 provides a route inventory map of all routes within the GRRRA. Within each RMZ section (sections 2.4, 2.5, and 2.6) figures are broken out by alternatives and display either routes or trails.
With specific focus on BLM requirements for compliance with the National Historic Preservation Act, there is no evidence that BLM has consulted on this "undertaking" in the meaning of 43 CFR 800 or the specific coordination provision with NEPA under 43 CFR 800.2. Visual and audible impacts on National Register and eligible property must be considered in any undertaking.	3.7, 4.1	Consultation	Section 4.1, Table 53 identifies all the tribes, agencies, organizations and businesses consulted in the preparation of the GRRRA. Consultation was done in accordance with NEPA and all other rules, regulations and policies.
VRM-Scenic impacts are part of the recreation experience and exclusion of VRM classification from consideration in the plan is not acceptable. It would make sense that area classified as RMZ1 (non-motorized, trail base) would have a different VRM classification for "desired future condition" than areas classified as RMZ3 (no constraints to motorized use).	1.7.2	VRM	The VRM RMP amendment was completed in April, 2013. As such, management decisions made within the VRM amendment have been incorporated into this planning effort and VRM has been analyzed as a resource in Chapter 3.
Socio-economic assessment - The document does not address the economic impacts on the urban interface zones immediately adjoining the Glade particularly on the south and east side of the Glade. Noise and air pollution in the adjoining residential areas by access to, and use of the propose SRMA, needs to be addressed. There is no quantification of, or profiling the amount of use in recreation days by various users: foot, horseback, mechanized-non-motorized (bicycles), motorized off-route, motorized on route.	3.13, 1.7.2	Social and Economic Impacts, Noise, Air Quality	We have no information that economic impacts would be different for areas adjacent to the Glade as compared to the population centers identified in section 3.13 Social and Economic Features. Section 1.7.2 addressed both air quality and noise. Appendix E: Recreation Monitoring Plan identifies the methods that BLM would utilize to quantify use numbers and types of uses within the GRRRA.

Comment Summary	Section	Topic	Response
It appears under all action alternatives that all recreational cross-country hiking and on foot sight seeing activities would not be permitted. If this is true, how will that be enforced, if this is not true then how will hiking be allowed and managed (GRRR EA page 1).	1	Hiking/Equestrians	Based on a thorough review of page 1 and the entire document, BLM is not limiting these activities through this planning effort.
Paleontological resources in the Glade, particularly petrified wood are part of the scenic values of the Glade. It is unacceptable to defer assessment of the paleontological resources; they should be protected within the Glade as part of the recreational sightseeing values.	3.8	Paleontology	Allocations to protect paleontological resources have been made in GRRR-CAA-MA-43. Impacts to paleontology resources are assessed in section 3.8 for each alternative.
Old Spanish Trail. Multi-purposing the best location for an Old Spanish National Historical Trail interpretive trail into a parking lot also oriented to OVH uses should be modified. As a "trail volunteer" the recreational sightseeing use of the trail should be segregated from other recreational uses of scenic hiking, horseback riding, mountain biking and motorized activities. Any of these uses may be acceptable within the OSNHT corridor but need to be oriented specifically to the proper use of the National Historical Trail as the dominant use.	2	Old Spanish National Historic Trail	The goal of RMZ 1 is to support non-motorized recreation use on designated trails. Similarly, the goal of RMZ 2 is to support both motorized and non-motorized recreation use on designated trails. Both of these goals are consistent with the management of the Old Spanish National Historic Trail in that they manage recreation use to reduce impacts to the congressionally designated line by identifying routes and trails that may be utilized for recreation opportunities.
I support the recommendation of retaining the cliffhanger trails throughout the open area as UTVs also use them.	2.4, 2.5, 2.6	Cliffhanger Trails	Allocations have been made within each of the different alternatives to designate the Cliffhanger trailhead and trails within and outside of the open areas. The vast majority are within RMZ3 and though this is an open area, designation of trails within RMZ3 will protect the trail integrity during future planning efforts.
I also support and/or creation of motorized single track on the west side of the GRRR. This will reduce the chance of motor cycle versus UTV incidents.	2.5	Motorcycle Trail	At the request of a member of the public, a motorcycle trail was identified for designation on the west side of the GRRR. This route is identified in Figure 16, Figure 18, and Figure 20 based on the other allocations for each alternative.

Comment Summary	Section	Topic	Response
It is also extreme important to keep cross-over trails from Flora Vista area to the GRRA.	2		Multiple routes have been identified for OHV use to cross RMZ 1 from Flora Vista and surrounding communities to reach RMZ 2 (Figures 11, 12, 13, 14, 15, and 16). These routes include both designated roads and trails.
We would like to see increasing the OHV/UTV trail widths to at lease 68 inches from 65 inches.	2		This suggestion has been considered in Alternative B which analyzes widening the OHV trail to 75 inches.
segregation of these trails is not right and shouldn't happen	2		Alternative B analyzes the RAR being maintained as a single track motorized trail. The BLM preferred alternative does segregate out the east side trail of the RAR as non motorized, however, based on public input, we incorporated the expansion of the single track motorized on the Westside to maintain trail integrity and increase overall mileage.
As a frequent OHV and Mountain Bike user of the GRRA I ask that existing and existing marked motorized routes, specifically single track trails used by off road motorcycles, be kept open for such use in the proposed limited areas. This would serve to both reduce user conflicts by reducing traffic density on existing trails and provide for continued use of a great public resource.	2		Based on the route inventory (Figure 2) and public input, BLM assessed which routes would meet the widest variety of recreation needs. Under the BLM preferred alternative, there would be approximately 50 miles of designated motorized single track and 28 miles designated for non-motorized single track (Table 9).
Some of the existing trails are not specifically in the inventory of marked trails but do see frequent use by responsible users and have for some time. Furthermore these trails have been tracked via GPS by users. This would allow for easy surveying and designation as approved routes, and coupled with their low maintenance requirements for sustainability would make them a great addition to the allowed OHV routes of the GRRA.	2	Trail Network	Please see response to Comment 20.01. Additionally, allocations have been made for the potential future extension of the trail network system (GRRA-CAA-MA-37).
Finally I request the the proposed west boundary of alternative B be adopted into the preferred alternative A. Again to suit the use patterned of OHV community which goes back many years.	2	Boundary	To reduce resource conflicts that are present on the west side of the GRRA, BLM placed the preferred alternative boundary on the outside edge of the OHV trail.

Comment Summary	Section	Topic	Response
<p>Having the ‘Sand wash’ as off limits to the OHV doesn’t really make sense to me. Historically Mountain biking, Hiking and even to a lesser degree Horseback riding down a Sand wash isn’t very fun/feasible. Seem that group would want something closer to town on the East-side of the wash, where the OHV groups would want ‘the Sand wash’ and the Westside of the area.</p>	2	Trail Network	<p>The main GRRRA wash has been designated in all alternatives as a route limited to OHV use. Therefore it will continue to be available for future OHV use.</p>
<p>Something else to consider from a safety perspective is to make some of the trails directional, meaning make the trail one to be utilized one direction, especially if it’s a loop. This would help prevent any unintended ‘head on’s’ or accidents from two individuals coming from differing directions on the same narrow trail. This doesn’t matter if it’s bike on quad, or any OHV and a hiker or horseback rider. Preventing such incidents would also help reduce conflict between the various groups as well. Just something to consider.</p>	2	Trails	<p>Allocations have been made within this planning effort to establish trails as directional trails. Specifically, GRRRA-CAA-MA- 38. "Trails may be designated "one-way." All such trails will be adequately signed."</p>
<p>It is hard to tell from the maps but it looks like the Intimidator trail and Harolds Hiway trail are out of the zone possibly. I would like to see this zone extended as these are 2 of my favorite trails in the canyon and are more challenging than most.</p>	2	Cliffhanger Trails	<p>The Intimidator trail is located within RMZ 3 which is the Open to cross country travel area. It would be made open for future public use. BLM cannot confirm the location of Harold highway and cannot respond to this question.</p>
<p>closing 20-25% of existing MV lands for NMV is probably reasonable to help with the problems that have arisen. But I also think that putting the NMV areas right in the middle of GRRRA is a terrible idea, as that will just continue to invite conflict between groups.</p>	2	RMZ	<p>RMZ 1 is not located with in the middle of the GRRRA (Figure 6). Though a portion of the GRRRA has been proposed to extend further east of RMZ 1, this was done in order to accommodate the publically desired OHV trail. The development of RMZs was to establish management objectives that would help reduce conflict.</p>

Comment Summary	Section	Topic	Response
<p>In Section 1.8 Planning Criteria and Constraints of the EA, BLM states that Consultation with Native American Tribes, SHPO (State Historic Preservation Office) and USFWS (United States Fish and Wildlife Service) will be conducted, as needed throughout the plan. Due to the importance of consultation with tribes and agencies that have legal responsibilities in the GRRRA to protect important resources, SJCA requests all letters sent by BLM contacting Native American Tribes, SHPO and USFWS on the availability of the February 2014 preliminary/draft GRRRA R&TMP EA. Please provide SJCA with all formal responses from Native American Tribes, SHPO and USFWS on finalized consultation on the February 2014 preliminary/draft GRRRA R&TMP EA. SJCA does not agree that BLM has fulfilled consultation requirements by simply “contacting” local, state and federal agencies, as well as Native American tribes, “to initiate consultation and solicit information about issues of concern for the planning effort.” (page 7, GRRRA R&TMP EA).</p>	1	Consultation	<p>Chapter 4.1 documents all the entities, including Native American Tribes, which were consulted during this process. Additional information requests should follow the appropriate Freedom of Information Act procedures.</p>
<p>For example, all references in the February 2014 preliminary/draft GRRRA R&TMP EA to the Old Spanish National Historic Trail (OSNHT) within the GRRRA, a component of the National Landscape Conservation System, must acknowledge that the OST wasn’t even included in the 2003 BLM/FFO RMP/EIS. Therefore, a RMPA is not possible for the OSNHT in the GRRRA until the OSNHT alignment and features are formally identified, surveyed and analyzed for impacts and desired future conditions.</p>	2.3	OSNHT	<p>The Old Spanish National Historic Trail was formally designated in The National Trails System Act (P.L. 90-543, as amended through P.L. 111-11, March 30, 2009). This Act provided the Congressionally designated alignment and overarching conservation goals for the Old Spanish National Historic Trail. As the GRRRA planning document contains only a small portion (<2 miles) of an approximately 2,700 miles of trail it would be inappropriate to make management decisions for the entire trail as a whole. This planning effort has made allocations to incorporate the Comprehensive management plan when it becomes available.</p>

Comment Summary	Section	Topic	Response
<p>Similarly, decisions in the GRRR rely heavily on unresolved Visual Resource Management (VRM) RMPA analyses that have not been completed. BLM cannot defer National Historic Trail analyses or VRM analyses prior to completing the GRRR R&TMP NEPA process. Indeed, BLM tries to circumvent this issue on page 13 of the EA, where BLM states, “Management decisions outlined in the VRM RMPA will be applied as appropriate to the GRRR when the VRM RMPA EA is completed. . . .Accordingly, visual resources will not be discussed further in this planning document.” The attempt by BLM to pursue this tactic is highly illegal. The GRRR R&TMP EA must include VRM analysis throughout the document and cannot be legally approved until updated VRM RMPA information is included in the GRRR R&TMP EA. Visual resource issues have a prominent role in the GRRR and may turn out to be of significance when BLM gets around to analyzing them.</p>	3.15	VRM	<p>The VRM RMP amendment was completed in April, 2013. As such, management decisions made within the VRM amendment have been incorporated into this planning effort and VRM has been analyzed as a resource in Chapter 3. Additionally, allocations have been made within the various alternatives (Chapter 2) to create the National Trail right-of-way for the OSNHT.</p>
<p>the National Park Service has comanagement responsibilities for the OSNHT in the GRRR and must facilitate a Comprehensive Management Plan for the OSNHT using the best information to manage the contiguous trail. The segment of the OSNHT must not be segmented or managed separately/independently from the comprehensive BLM/NPS plan for the trail.</p>	2	OSNHT	<p>BLM has acknowledged that a comprehensive trail management plan is in the process of being completed for the OSNHT. Allocations have been made within this planning effort to incorporate any management directions that may arise with the completion of the OSNHT Comprehensive Trail Management Plan (Chapter 2). BLM has identified the preliminary location for the trail based on the congressionally designated line (RMZ1-A-MA- 7).</p>

Comment Summary	Section	Topic	Response
<p>The same care should be afforded by BLM in crafting a reasonable range of alternatives for analysis in the preliminary/draft GRRR R&TMP EA. In soliciting comments from SJCA on the February 2014 preliminary/draft GRRR R&TMP EA, SJCA observes that BLM has dropped the February 2013 RTMP EA Alternative C: Non-Motorized Area. Alternative C: Non-Motorized Area would have provided for a non-motorized trail area as well as motorized OHV use within the GRRR boundary, while reducing the overall trail/route density and implementing project design features developed to provide protection of resources, improve visitor safety, and to reduce conflicts among users. BLM stated in the February 2013 EA, “under Alternative C, the BLM would designate and manage a non-motorized trail area of approximately 8,030 acres located northeast of the main Glade wash (CR 1980). Trails within this area would be limited to non-motorized single-track trails and dispersed equestrian trails. Additional non-motorized trail development or modification would be considered by BLM and reviewed through the NEPA process as resources become available.” SJCA recognizes the need for potential new nonmotorized trail NEPA analysis: however, the existing 42-mile multi-track (single track trail for pedestrians, mountain bikes, motorcycles and horses) has already been designated, approved by BLM, and analyzed in numerous BLM Planning documents including the 1996 RAMP which inventoried and designated single track. BLM also already has clear legal responsibility to assert their authority to close, rehabilitate and reclaim all unpermitted roads, including unapproved oil and gas roads, in the GRRR as required in stipulations/conditions of approvals set at the Application to Drill and Right-of-Way application (299) stages. Any attempts to reduce the single track trail for pedestrians, mountain bikes, motorcycles and horses will be contested.</p>	<p>2.4, 2.5, 2.6</p>	<p>Alternatives</p>	<p>Alternative C continues to be analyzed in this planning effort and emphasizes non-motorized recreation. The GRRR planning document provides for a wide variety of recreation opportunities. This planning effort utilizes Recreation Management Zones (RMZs, Chapter 2) to identify areas within the GRRR that have a different management focus from other areas within the GRRR. Specifically, RMZ 1 has a primary management focus of non-motorized use; similar to the Alternative C described in your comment. This planning is consistent with BLM planning criteria from the Recreation and Visitor Services Handbook (H-1601-1). Additionally, the 40 mile Road Apple Rally trail would not be closed to non-motorized use. This is clearly identified throughout the planning document in Chapter 2 and is consistent with the Travel and Transportation Management Handbook (H-8342).</p>

Comment Summary	Section	Topic	Response
<p>Section 1.7.3 Alternatives Submitted During Public Scoping of the February 2014 preliminary/Draft GRRR R&TMP EA discusses a Velo de Animas alternative submittal which is quickly dismissed by BLM although Alternative C: Non-Motorized Area was readily brought forward by BLM in the February 2013 EA. Although BLM never accurately discloses that they are proceeding with an Alternative Eliminated from Further Consideration, the Non-Motorized Alternative is summarily removed from analysis in the EA under the impression that it just came up under scoping. In fact, the public has been led to believe that BLM was seriously considering Alternatives that would separate uses, given public safety issues associated with user conflict in the GRRR. Despite BLM management acknowledgement that BLM/FFO could conceivably segregate uses in the GRRR to separate valid multiple use, BLM has now discarded a primary management tool in cultivating a management approach for implementation in the GRRR. BLM is shortchanging public involvement and user group input by now discarding a reasonable range of alternatives which formerly included analysis of a stand alone Non-Motorized Alternative.</p> <p>SJCA formally requests that the Non-Motorized Alternative be placed back in the next version of the GRRR R&TMP NEPA document and that removal of the Non-Motorized Alternative in the previous EA (February 2013) form represents a failure of BLM to present a Reasonable Range of Alternatives.</p>	2.4, 2.5, 2.6	Alternatives	<p>See response to comment 30.05. As noted in the previous response, BLM does provide for a wide range of alternatives including an RMZ area that has the primary management focus of non-motorized use (RMZ 1, Chapter 2). As noted in Section 1.7.3: Alternatives Submitted during Public Scoping, the closure of the entire GRRR area would not meet the goals and objectives for this planning effort.</p>
<p>None of the Alternatives proposed by BLM in the GRRR R&TMP EA would provide for stepped up law enforcement and/or increased protection of natural and cultural resources.</p>	1.7.2	Law Enforcement	<p>As noted in section 1.7.2: Issues Considered but Not Further Analyzed, direction regarding law enforcements staffing and priorities is an administrative decision, not a planning level decision. Additionally, allocations for monitoring have been made in Appendix D. The protection standards of cultural or natural resources are consistent with all law, regulation, and policy; as identified in Section 1.5.</p>

Comment Summary	Section	Topic	Response
SJCA requests that BLM/FFO comply with evaluation of the “minimization criteria” in the next version of the GRRR R&TMP EA.	2.1.3, Appendix A	Designation Criteria	43 CFR 8342 are in fact designation criteria and not “minimization criteria”. Section 2.1.3 within the planning document outlines these designation criteria which are reiterated on the Route Evaluation Form found in Appendix A. All designated areas and routes are in compliance with 43 CFR 8342.
lack of protection of the Old Spanish National Historic Trail in the GRRR	2.4, 2.5, 2.6	OSNHT	Allocations have been made for the Old Spanish National Historic Trail within all the alternatives (sections 2.4, 2.5, and 2.6).
failure to evaluate impacts to cultural resource Areas of Critical Environmental Concern (ACECs) in the EA (River Tract ACEC and East Side Rincon ACEC),	1.7.2	ACEC	As noted in Section 1.7.2, Changes to ACEC boundaries and/or management prescriptions must be identified in a FR notice. The FFO did not identify ACEC boundary or management changes in the NOI for the RMPA, and as such, changes to these areas are outside the scope of the planning process. Any potential impacts to either ACEC are in conformance with the 2003 RMP, as amended. Specifically within the Riparian Areas, “Off road vehicles limited to roads (designated maintained country roads, designated unmaintained county roads, and active oilfield access roads)” and for the East Side Rincon ACEC “Designated as limited OHV area and close identified roads.” Both of these management prescriptions have been met through the travel and transportation effort. There are not expected to be any impacts to these ACEC from activities occurring in the GRRR due to topographic access issues.

Comment Summary	Section	Topic	Response
failure to identify minimization requirements	2.1.3/ Appendix A	Designation Criteria	Section 2.1.3 within the planning document outlines these designation criteria which are reiterated on the Route Evaluation Form found in Appendix A. All designated areas and routes are in compliance with 43 CFR 8342.
attempts to make pre-decisional decisions on powerline proposals in the GRRRA	1.5	Plan Conformanc e	It is unclear where BLM made pre-decisional decisions on power line proposals.
contradictory data in EA versions	1.8	Contradictor y Data	Additional information is needed to assess that contradictory data was utilized in this EA. As BLM is always accepting new data from internal and external sources, data sets do change accordingly. BLM has made it's best effort to ensure that all data is consisted and non-contradictory.
incomplete inventories	2.1.3	Inventories	Additional information is needed regarding which inventories are incomplete. Planning through CEQs for NEPA (43 FR 55994, Nov. 29, 1978, Sec. 1502.22) requires that BLM plan using the best available data. BLM has used the best available data for all resources as required by CEQ regulations.
failure to comply with FLPMA and the NHPA	1.5 and 1.6	Plan Conformanc e	As stated in Section 1.5 and 1.6, this planning effort is in compliance with all laws, regulations and policies.
arbitrary boundary adjustments	Chapter 2	Boundary	BLM is not aware of any arbitrary boundary adjustments. Additional information is needed to support this claim.
unanalyzed and illegally approved Cliffhanger Trails System Trailheads and trails	2.4, 2.5, 2.6	Cliffhanger Trails	The Cliffhanger trails and trailheads are identified within the alternatives (Chapter 2) and their impacts analyzed as part of the transportation system in Section 3.10 Transportation and Travel.

Comment Summary	Section	Topic	Response
the lack of a VRM classification and Cenery Management section and analysis in EA	3.15	VRM	Please see response to comment 30.03.
lack of a public health and safety section in the EA	3.10, 3.11, 1.7.2	Public Health and Safety	BLM has added impacts analysis to address Public health and safety in a variety of sections including Section 3.11: Recreation; Section 3.10: Transportation and Travel; and Section 1.7.2 under Law Enforcement responsibilities.
an ill defined definition/analysis of moutain bikes as mechanized (or is it "human poewred" vehicla or an entirely different definition that would make a distinction between mountain bikes and motorized vehicles	2.1.3	Mechanized	The definition of mechanized travel is “Moving by means of mechanical devices such as a bicycle; not powered by a motor” (Travel and Transportation Handbook H-8342). Based on the definition of mechanized, mountain bikes clear fall within the description of mechanized.
lack of commitment for enforcement under any of the Alternatives presented	1.7.2	Law Enforcement	Please see response to comment 30.07.
Despite the noted requirement of BLM 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.	2.3.3	Inventories	Planning through CEQs for NEPA (43 FR 55994, Nov. 29, 1978, Sec. 1502.22) requires that BLM plan using the best available data. Cultural: GRRR-CA-MA- 6, GRRR-CAA-MA- 27, GRRR-CAA-MA- 42; Paleontological: GRRR-CAA-MA- 43; Special Status Species: GRRR-CAA-MA-41, RMZ2-A-MA- 7.
The EA provides no meaningful measures to protect archeological resources, protect public health and safety, protect and manage the OSNHT corridor.	2.3.4, 2.3.5, 2.3.6	Resource Protection	Allocations have been made within this planning effort with regards to cultural resources, public health and safety, and the OSNHT (cultural: GRRR-CA-MA- 6, GRRR-CAA-MA- 27, GRRR-CAA-MA- 42; health and safety: GRRR-NA-A- 3, ; and OSNHT: RMZ1-A-MA- 7, RMZ1-C-MA- 9, RMZ2-A-MA- 8, RMZ2-B-MA- 11, RMZ2-C-MA- 7). See Reponses to 30.09, 30.14, and 30.22.

Comment Summary	Section	Topic	Response
<p>The BLM does not have the tools in place to protect public health and safety in the GRRRA. Admittedly, BLM’s law enforcement staff is limited/scarce and attempts to step up joint legal enforcement in the GRAA with the local sheriffs office has been confusing and disjointed over time. The natural gas facilities in the GRRRA present significant public health and safety issues to recreationists. We are now told on page 2 of the EA that there are “over 641” predominantly gas, well pads. Given that the GRRRA covers approximately 35 sections, that equates to 18.3 well pads per section, but BLM doesn’t know for sure as they claim a nebulous number prefaced by “over.” Lest SJCA remind BLM that they advertise the GRRRA as recreation area with very sparse acknowledgment to the unsuspecting public as to the significant and, sometimes, hazardous level of oil and gas development, operations and activities in the GRRRA. The GRRRA has numerous areas of unprotected pipelines, high pressure pipeline ROWs being used illegally as roads, compressors, separators/dehydrators, Central Delivery Points, hundreds of oil and gas service vehicles traveling the GRRRA every day (including produced water disposal trucks). The 1996 GRTS RAMP and RMP amendment clearly identified public health and safety issues at the time with the forward thinking RAMP outcome of implementation of measures to manage the GRTS. This pertains to the GRRRA R&TMP EA, as the results of any NEPA document done here in 2013 are meaningless if the BLM has no implementation plan to manage the GRRRA. Continued reliance on limited law enforcement and no barriers to delineate proposed RMZs do not provide the level of BLM management required to secure public health and safety in the GRRRA. Without a revised/renewed commitment of resources from the BLM to inventory, monitor, protect and enforce protection of all resources and uses in the GRRRA, the EA simply remains legally deficient and a waste of everyone’s time. The public has no reason to be satisfied with the BLM’s effort to date on preparation of the NEPA document for the GRRRA.</p>	1.7.2	Law Enforcement	<p>Please see section 1.7.2 for law enforcement. The preferred alternative in the amendment would reduce impacts to public health and safety by designating routes for use that are located away from O&G facilities. Additionally, reference allocations for increased signage on roadways that trails cross. This document contains implementation measure to ensure public safety within the area.</p>

Comment Summary	Section	Topic	Response
There is no overlay map of oil and gas facilities in the GRRRA – is this not a significant use of public lands in the GRRRA?	1.7.2	Oil and Gas	While BLM acknowledges that O&G is a significant use of the GRRRA, we are not making any changes to the current allocations to O&G development. As such O&G is not expected to be impacted by this planning effort and no map is necessary.
Controversy alone, as defined by Significance Criteria of Intensity, is grounds for BLM to shelve this EA and start an EIS.	1.5	Plan Conformance	The effects associated with the alternatives analyzed within these alternatives have been analyzed to be determined to be insignificant therefore an EIS is determined to be unnecessary.
Archaeological, traditional cultural properties, and paleontological resources are currently being destroyed in the GRRRA. The continued lack of enforcement by BLM will negatively impact scientific, cultural, and historic resources in the GRRRA. The failure to include archaeological inventories, analyses and studies of the proposed project area result in inadequate compliance with the Archaeological Resource Protection Act (ARPA), National Historic Preservation Act (NHPA), or Native American Graves Protection and Repatriation Act (NAGPRA). The Environmental Justice section conclusions in the EA are unsupported. Until BLM completes archeological surveys for the GRRRA and OSBHT, any NEPA document for the GRRRA is devoid of legal integrity. An inventory of cultural resources (including archaeological sites and traditional cultural properties) would need to be conducted for any decision of the GRRRA R&TMP to be legal. The February 2013 EA stated between 197 and 302 archeological sites within the areas that have been inventoried between 12 and 13% (EA, page 110). That number has now been amended to, "... 203 documented culture resource sites within the GRRRA and between 186 and 284 documented cultural resource sites within the GRRRA Alternatives." (P. 135 of EA). Yet, only a maximum of 15% of the GRRRA has been inventoried for archeological sites? There is no assessment of the National Register of Historic Places eligibility of these sites and no assessment of the differential impacts that are taking place under the no action alternative or other alternatives.	2.3	Inventories	The following allocations have been made regarding survey for and protection of the associated resource: Cultural: GRRRA-CA-MA- 6, GRRRA-CAA-MA- 27, GRRRA-CAA-MA- 42; Paleontological: GRRRA-CAA-MA-43; Special Status Species: GRRRA-CAA-MA- 41, RMZ2-A-MA- 7. The approval of this plan will not have any impacts on the cultural or paleo resources within this area.

Comment Summary	Section	Topic	Response
<p>Furthermore identification of the OSNHT within the Glade without consideration of consequences of proposed authorized uses is insufficient to meet the impact criteria of NEPA. 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. In addition, BLM did not properly consult on this version of the EA with the State Historic Preservation Officer (SHPO).</p>	2.3/4.1	Route Reclamation	<p>Allocations have been made for the closure and reclamation of routes. Specifically, GRRRA-CAA-MA-17, GRRRA-CAA-MA-18, GRRRA-CAA-MA,- 32 and GRRRA-CAA-MA- 33 which direct how routes will be identified for closure and reclamation procedures. As new project are proposed within the OSNHT corridor, they will be analyzed through the NEPA process. Consultation was completed for all entities listed in Chapter 4.1.</p>
<p>According to the unsigned FONSI for the GRRRA 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.</p>	3.3	Realty	<p>Oil and gas activities are not expected to have impacts or be impacted from decisions in this RMP amendment. The San Juan Basin Energy connect project follows an existing ROW corridor. There would be no new net impact of the placement of the power line within the GRRRA. We have no information that economic impacts would be different for areas adjacent to the Glade as compared to the population centers identified in section 3.13 Social and Economic Features. The maps of vegetation cover are documented in Chapter 3, section 3.3. The documentation of cultural resource sites would occur as projects are developed. It is illegal for us to map cultural resources in a public document. Every section of Chapter 3 contains a cumulative analysis section.</p>
<p>BLM cannot legally support claims that violations of NEPA, FLPMA, NHPA, ARPA and failure to protect a component of the National Conservation Landscape System have not occurred in the GRRRA R&TMP EA.</p>	1.5	Plan Conformance	<p>BLM has adhered to all applicable law, regulation and policy.</p>

Comment Summary	Section	Topic	Response
<p>The landscape of the GRRRA is marked by starkly degraded land health standards (soils, erosion, sediment transfer) including many areas devoid of vegetation. Poor and/or nonexistent inventories of BLM managed resources have limited BLM's analysis of the area. SJCA requests all reports from BLM concerning land health standard appraisals in the GRRRA.</p>	Chapter 3	Analysis/FOIA	Information requests should follow the appropriate Freedom of Information Act procedures.
<p>BLM has failed to identify historic properties and complete archeological inventories in the GRRRA while allowing OHV routes to proliferate and damage archeological resources. In addition, BLM has failed to consult with the SHPO and Native American tribes on archaeological impacts in the GRRRA.</p>	4.1	Consultation	Please see response to comment 30.02.

Comment Summary	Section	Topic	Response
<p>On page 150 of the EA, BLM discusses Cumulative Impacts and talks about how new oil and gas infrastructure will be developed in the GRRR. The EA then states, “Additionally, SJBEC project and other utility ROW will be established and new routes developed or existing routes enhanced to support these ROWs.” BLM is referring to a proposal by Tri-State to site the San Juan Basin Energy Connect powerline in the GRRR as part of its alignment from Shiprock, New Mexico to Ignacio, Colorado to bring electricity to natural gas facilities. This proposed project is currently the subject of a Draft EIS being prepared by BLM/FFO. SJCA requests written clarification from BLM/FFO on the SJBEC project: Has BLM already approved the SJBEC project before the EIS and GRRR R&TMP EA? If so, that represents a significant breach of public trust for BLM/FFO. BLM/FFO, by purporting to predetermining the approval of SJBEC and establishing the ROW, in making a predetermined conclusion, creates an unlevel playing field that may benefit industrial development at the expense of other multiple use resources in the GRRR that have yet to be inventoried (including VRM and archeological resources). There is a long line of cases that warn agencies against making a predetermined decision with respect to their NEPA analysis. The 10th Circuit Court of Appeals has cautioned: “[I]f an agency predetermines the NEPA analysis by committing itself to an outcome, the agency likely has failed to take a hard look at the environmental consequences of its actions due to its bias in favor of that outcome and, therefore, has acted arbitrarily and capriciously.” <i>Forest Guardians</i>, 611 F.3d at 713 (citing <i>Davis v. Mineta</i>, 302 F.3d 1104 (10th Cir. 2002)). The 10th Circuit further stated that “[w]e [have] held that ... predetermination [under NEPA] resulted in an environmental analysis that was tainted with bias” and was therefore not in compliance with the statute. <i>Id.</i> (citing <i>Davis</i>, 302 F.3d at 1112–13, 1118–26)).</p>	3.3	Realty	BLM has clarified, on page 150, that neither the SJBEC project nor any other project has been approved.
<p>BLM has failed to analyze public health and safety issues in the GRRR. Please include a public health and safety section in the next version of the EA and fully evaluate public health and safety issues in the GRRR.</p>	3.10, 3.11, 1.7.2	Public Health and Safety	Please see response to comment 30.19.
<p>BLM failed to prepare a Reasonably Foreseeable Development section in the EA. This is unacceptable.</p>	1.7.2	Oil and Gas	O&G allocations and decisions are outside of the scope of this RMP amendment. Therefore an RFD is not necessary.

Comment Summary	Section	Topic	Response
<p>BLM has acknowledged the authority to close routes and reclaim, restore and revegetate unauthorized routes and ROWs (including as part of stipulations/COAs for oil and gas road and pipelines). It is unclear from Appendix F of the EA, Route Comparison Table, as to what BLM is doing with closed routes and what specific actions are being taken to close routes in the GRRRA. Please provide more information on what specific actions are being taken by BLM to close routes in the GRRRA.</p>	2.3/4.1	Route Reclamation	<p>Allocations have been made for the closure and reclamation of routes. Specifically, GRRRA-CAA-MA-17, GRRRA-CAA-MA-18, GRRRA-CAA-MA,- 32 and GRRRA-CAA-MA- 33 which direct how routes will be identified for closure and reclamation procedures.</p>
<p>BLM is aware that numerous other agencies have expertise and management responsibilities for lands and resources in the GRRRA. Rather than seeking real partnerships and Cooperating Agencies BLM has continued to portray meaningful interaction/information exchanges on the latest version of the GRRRA R&TMP EA. Sending interested parties and potential Cooperating Agencies a letter “contacting them” is hardly collaboration. Continuing BLM’s sloppy work on this EA, Page 54 of Appendix G Comment Response Table states that, “The BLM did not (underlined for emphasis) determine that offering cooperating agency status would add any additional benefit to their participation in the process and none of these agencies expressed an interest in Cooperating Agency status at any point during the preparation of the EA.” SJCA doesn’t believe BLM’s claim that none of these agencies expressed an interest; given the right collaborative parameters, there may be an opportunity for Cooperating Agencies. Sadly, BLM’s rush to get this EA out the door doesn’t necessarily allow for development of cooperation or any real meaningful interaction with the public.</p>	4.1	Consultation	<p>There is no requirement for BLM to offer collaborating agency status for an amendment EA. As no agency requested collaborating agency status during consultation, BLM did not deem it necessary to extend collaborating agency status invitations.</p>
<p>The GRRRA R&TMP EA cannot arbitrarily approve Cliffhanger Trailheads and Trails without site-specific NEPA compliance for these trails/routes. In addition, site-specific archeological and biological surveys must be completed as part of the NEPA analysis for the Cliffhanger Trailheads and Trails given the unique impacts of vehicle traveling on cliff and rock features. Please remove NEPA unapproved Cliffhanger Trailheads and trails from consideration/evaluation in the GRRRA R&TMP EA.</p>	2.3	Route Reclamation	<p>The majority are within RMZ 3 which is an open area identified and analyzed in the 1996 Recreation Management Plan. Allocations have been made for survey of routes within the GRRRA. Please see response to comment 30.36.</p>

Comment Summary	Section	Topic	Response
<p>BLM claims that they have no authority to manage for user conflict (see page 15 of Appendix G, Comment Response Table) are unfounded and run contrary to BLM’s law enforcement responsibilities in the GRRRA and FFO, in general. Historic documents, including the La Plata TMP, have attempted to put the onus on the public for managing user conflict. Although the public has the responsibility to understand hazards and issues to be encountered on public land, BLM has the responsibility to manage public lands in a manner that provides public health and safety and minimizes user conflict. For example, a shooter with a automatic weapon shooting in a no shooting zone of the GRRRA would clearly be in conflict with recreationists on BLM public land: it is the responsibility of BLM to take enforcement action. Similarly, OHVs on nonpermitted trails in the GRRRA require BLM law enforcement for user conflict resolution. SJCA requests that BLM provide the rationale for taking the position that “user conflict” is beyond BLM’s authority. Please provide a written response to this request.</p>	2.1.2	NRRSM	<p>User conflict is the perceived negative interactions (conflict) that visitors may experience while recreating in an area. BLM attempts to reduce these perceived negative interactions by identifying the current and future desired Natural Resource Recreation Setting (NRRSM, Section 2.1.2) and by reducing use conflict in an area. The establishment of RMZs with specific management goals and the designating routes and trails reduced the potential for future negative interactions between users and also reduces interactions between different uses (i.e. OHV use and hiking).</p>
<p>SHPO's primary concern with the EA and its preferred alternative is centered on BLM's assertion that "all recreation would be restricted to designated roads and trails." To us, the EA seems vague and noncommittal in regards to how BLM intends to keep motorized vehicles from straying outside the prescribed boundaries, which could adversely affect unknown archaeological sites not limited to designated routes and trails.</p>	2.3.3, Appendices C&D	Inventories, Signs, Trail Monitoring	<p>A wide variety of management allocations have been identified in this planning effort to protect cultural and other sensitive resources as well as identify designated routes for public use (please see response to comment 30.22). Additionally, Appendices C and D lay out a sign plan and trail monitoring plan, respectively.</p>
<p>BLM should indicate what trails and roads designated for off highway vehicle (OHV) use will be subject to archaeological survey and at what point the trails and roads will be surveyed. For example, does BLM propose to survey all trails and roads designed for OHV use prior to official designation, to conduct surveys in a phased manner, or intend to survey only certain trail and road designations?</p>	2.3.3	Inventories	<p>Allocations have been made identifying when surveys will be completed (GRRRA-CAA-MA- 25 and GRRRA-CAA-MA- 27, please see response to comment 30.22). In addition, new proposed routes would follow all NEPA processing including survey.</p>

Comment Summary	Section	Topic	Response
<p>BLM should also specify how it plans to inventory and manage archaeological sites within RMZ 3, which is designated as an area open for motorized vehicle use. As the BLM itself states, areas designated for open motorized vehicle use are the most likely areas to have potential adverse effects to archaeological sites. However, BLM does not propose how it intends to manage this area. Does BLM intend to conduct block surveys within this area? How will existing and newly identified sites that are either eligible or unevaluated for listing in the National Register of Historic Places (NRHP) be protected from potential damage within RMZ 3?</p>	1.5, 1.6	RMZ	<p>The allocation and analysis to create an open area (RMZ 3) was completed back in 1996 Recreation Management Plan and carried forward into the 2003 RMP/PEIS. BLM analyzed the impacts and requested public comment of an open area during those planning efforts.</p>
<p>The FONSI references a previous report whereby certain routes found to interact with known cultural sites were at one time closed or limited to designated use, but SHPO was never provided this information.</p>	1.5, 1.6	RMZ/Route Reclamation	<p>BLM has the authority to close or limited use on routes for a wide variety of reasons, including for potential resource conflicts, without SHPO consultation. Additionally, the allocation and analysis to create an open area (RMZ 3) was completed back in 1996 Recreation Management Plan and carried forward into the 2003 RMP/PEIS. BLM analyzed the impacts and requested public comment of an open area during those planning efforts. Consultation occurred during the development of the RMP effort.</p>
<p>SHPO feels that other potential historic roads or trails within the GRRRA should be further analyzed for potential impacts associated with GRRRA designations. In its record search of 1881 General Land Office (GLO) survey maps, BLM found that several linear road features were identified with the GRRRA (Section 3.7.1; page 135). The BLM should do further analysis on whether any of these historic roads or road segments could be NRHP eligible, and if so, how would these be managed?</p>	3.7	Historic Roads & Trails	<p>Please see Chapter 3, section 3.7 for information on historic roads or trails within the GRRRA. Additional information is needed to determine if other historic roads or trails not included as part of this document exist within the GRRRA. As part of a standard cultural survey, review of GLO maps and historic documents is completed on a project specific basis. Any potential impacts to identified historic routes would be identified during that cultural review.</p>

Comment Summary	Section	Topic	Response
<p>As the current alternatives for the GRRRA currently exist, Alternative C is the only alternative that provides some archaeological protection. SHPO recognizes that Alternative C is unlikely to be acceptable for a multiple recreational use perspective, just as Alternative B is unlikely to be acceptable as well. However, other alternatives could be proposed that take into consideration both multiple recreational uses and the protection of archaeological resources. For example, the open motorized vehicle use area, which BLM has identified as having the highest potential for adverse effects to archaeological sites (section 3.7.2; page 137), could have many motorized trail designations within this area while not allowing for completely open motorized access. Such an alternative would be easier from an archaeological management perspective as linear routes are easier to survey and reroute to avoid archaeological sites than areas designated for completely open OHV use.</p>	2.3.6	Alternatives	<p>Alternative C is a valid alternative that has been analyzed throughout this document. Under alternative C, there would be no open area allocated and the dominate allocation would be for designated use. Additionally, allocations have been made to meet all survey requirements within the document (please see response to comment 31.02).</p>
<p>This second preliminary Plan and EA does not go far enough in segregating the OSNHT corridor as the “dominant” recreation resource to be managed in accordance with the direction provided in the National Trail System Act and BLMs own policy (BLM Handbook 6280). To wit (6280 Handbook Page 4--4) states:</p> <ol style="list-style-type: none"> 1. For all National Trails <ol style="list-style-type: none"> i. Safeguard the nature and purposes; and conserve, protect, and restore the National Trail resources, qualities, values, and associated settings and the primary use or uses. ii. Provide premier trail visitor experiences for public benefit. [emphasis added] iii. Maximize opportunities for shared National Trail stewardship. iv. Reduce the potential for uses that substantially interfere with the nature and purposes of the National Trail (see Chapter 1, 1.6 Statement of Programmatic Policy). v. Avoidance of activities that are incompatible with the purposes for which the National Trail was established (see Chapter 1, 1.6 Statement of Programmatic Policy). 	2.4, 2.5, 2.6	OSNHT	<p>The allocations provided within the planning document are BLM's best attempt to minimize impacts to the OSNHT corridor, as designated by Congress. These including identifying a protective corridor, mitigating future oil and gas leasing, and modification of management allocations as information becomes available, if needed. Additionally, until the comprehensive plan is released, this segment has not been identified as a high potential segment.</p>

Comment Summary	Section	Topic	Response
<p>Instead of quibbling over the fact of the legal trail designation in the “Existing Conditions” section (page 136 “The location of this route within the GRRRA has not been verified on the ground and its actual location may or may not be co-located with the GRRRA.”) the energy should be spent on protecting the Historic Trail corridor established by law in accordance with BLM Policy (Handbook Page 4--7):</p> <p>ii. The National Trail Management Corridor boundary should be based on the associated natural or manmade physical landscape features in the following order of precedence: ridgelines, rivers, washes, and toe--of--the--slope (where well--defined as in desert environments); turning points, such as peaks, buttes, and geologic features; roads, primitive roads or routes, and railroads; and lines of the Public Land Survey System. Measures, such as footage, mileage, and contour intervals, shall be discouraged. If certainty in location of a corridor boundary may become an issue (e.g., in a case of a flat or ill--defined ridgeline bordering an incompatible land status or usage), then lines of the Public Land Survey System should be considered.</p>	2.4, 2.5, 2.6	OSNHT	Please see response to comment 32.01.
<p>The GRRRA R&TMP will be inadequate unless it sets aside a special Recreation Management Zone for the OSNHT Corridor; here proposed to be identified as “RMZ4.” This zone should be common to all alternatives including the “no action alternative. Page 35 Figure 3, “No Action Alternative” must show the alignment of the Congressionally designated Old Spanish National Historic Trail which is part of the existing situation and must be managed under the “No Action Alternative.” Exclusion of the OSNHT in the no action alternative is not a trivial factual oversight. It has been within BLMs responsibility and authority to protect and manage the OSNHT as a part of the National Trail System Act since designation in 2002, and therefore this responsibility is part of the no action alternative.</p>	2.4, 2.5, 2.6	OSNHT	RMZs 1 and 2 contain management actions that are protective of the trail and meet the intent of the National Trails Act. Taken together, the identification of the ONHST as an RMZ would not be necessary. Figure 3 is a general overview map that is not intended to show trails or roads within the area. Figure 5 does show the OSNHT in conjunction with other designated trails in the No Action Alternative.

Comment Summary	Section	Topic	Response
<p>Deferral of establishing management prescriptions for the OSNHT until the completion of the Comprehensive Management Plan (CMP) as proposed on Page 47 shows a lack of understanding of what the CMP will do. The CMP is unlikely to be managerially “prescriptive” but is likely to establish sideboards in establishing desired future condition and priorities for proper use and protection of the unique characteristics of the OSNHT.</p>	<p>2.4, 2.5, 2.6</p>	<p>OSNHT</p>	<p>As identified in that allocation (GRRRA-CAA-MA- 48) we have the ability to be flexible in the management of the OSNHT once the comprehensive trail plan is complete. Specific allocations for the OSNHT can be found in sections 2.4, 2.5, and 2.6.</p>
<p>The map on page 60 (Figure 11 Route Designations RMZ1 Alternative A) and all maps including the area of the OSNHT should show the location of Old Spanish National Historic Trail alignment as designated by Congress. Not including this alignment on maps is analogous to not showing the boundaries of the existing Glade Run SRMA (which is part of the existing situation and no action alternative).</p>	<p>2.4, 2.5, 2.6</p>	<p>OSNHT</p>	<p>Figure 60 is specific to routes and not trails. Figure 12 identifies proposed trails including the OSNHT.</p>
<p>Deferral of allocations of inventory and a much overdue CMP for a National Historic Trail seems inconsistent with the acknowledged “Purpose and Need” for this Plan to designate recreation trails and transportation routes. This should be an opportunity to include the NHT instead of further defer execution of management responsibility.</p>	<p>2.4, 2.5, 2.6</p>	<p>OSNHT</p>	<p>BLM is not deferring executive management responsibilities. We have provided allocations to manage the trail and the flexibility to change those management prescriptions based on the comprehensive management plan.</p>
<p>The development of an interpretive facility somewhere adjacent to or within the OSNHT is a good idea, but should be clarified to be primarily for the recreational appreciation of the NHT and discouraging uses incompatible with the historical sightseeing opportunities on which the special designation was created. Having an interpretive trailhead also be a staging area and trailer parking area for motorized recreationalists is incompatible with the historic trail designation.</p>	<p>2.4, 2.5, 2.6</p>	<p>OSNHT</p>	<p>Allocations have been made to develop interpretive panels specifically to the trail (RMZ1-A-MA- 7, RMZ1-C-MA- 9, RMZ2-A-MA- 8, RMZ2-B-MA- 11, RMZ2-C-MA- 7).</p>

Comment Summary	Section	Topic	Response
<p>The ¼ mile corridor is arbitrary and inconsistent with the BLM 6280 guidance that the trail corridor be based on historic trail characteristics (essentially viewshed). In any event the ¼ mile corridor is wide enough to form a ¼ mile wide polygon on the map and should be so represented. The notion of establishing the NHT trail corridor as an exclusion area for future mineral and energy minerals leasing is to be applauded but should include a statement for a goal of long term rehabilitation of native vegetation and reclamation of disturbances to historic landforms (in the period of Trail significance (1829--1848) as existing facilities are closed and abandoned.</p>	<p>2.4, 2.5, 2.6</p>	<p>OSNHT</p>	<p>Based on the available information of the congressionally designated line, 1/4 miles serves as a proxy until additional information can be obtained. This corridor was developed based on an analysis of the level of development currently within the area and the VRM of the trail.</p>
<p>The provision for modifying the trail corridor based on availability of new information should specify that tis would be based on detection of historical or archeological evidence of the trail or trail related features and would be based on the guidelines for the trail corridor in the NTSA and the BLM Handbooks for trail management. In no case would the trail corridor be less stringent than the current designation.</p>	<p>2.4, 2.5, 2.6</p>	<p>OSNHT</p>	<p>BLM agrees.</p>

Comment Summary	Section	Topic	Response
<p>Segmenting. The final bullet is not consistent with the special designation of the OSNHT which is the dominant use as a result of the special designation. This would be similar to managing Chaco Protection Sites for oil and gas or coal extraction. The notion of segmenting management of this section of the OSNHT independent from other sections violates the spirit and intent of the NTSA and BLM policy which define the trail as a continuous entity, not discontinuous segments.</p> <p>The forgoing issues track through the remaining OSNHT management prescriptions and map. The election of a ½ mile corridor for RMZ1 Alternative C and RMZ2 Alternative C is arbitrary and not based on NTSA specifications or BLM policy that the trail corridor be based on topography, vegetation, landmarks and trail character.</p> <p>Page 66</p> <p>RMZ1-C-MA- 9. Pursuant to additional cultural inventory and/or the publication of the Joint BLM/NPS Comprehensive OSNHT Management Plan, management of the OSNHT would include the following:</p> <ul style="list-style-type: none"> • Development of an interpretive station near or at the proposed parking/staging area identified in T31N R12W, section 14 SW ½, pursuant to appropriate funding and personnel. • Manage a ½ mile corridor centered on the congressionally designated trail as a NSO area for new mineral leases and/or future renewable energy development. • This ½ mile corridor will serve as the official National Trail Right-of-Way until such time as new information becomes available and/or the corridor is modified. • New routes designated within the ½ mile corridor must meet the intent of the NTSA, be nonmotorized in nature, and attempt to maximize the vicarious experience of the OSNHT. • As additional information is acquired by BLM, modifications may be made to the size, location and/or management prescriptions of the corridor and/ or OSNHT. <p>Page 73</p> <p>RMZ2-A-MA- 8. Pursuant to additional cultural inventory and/or the publication of the Joint BLM/NPS Comprehensive OSNHT Management Plan, management of the OSNHT would include the following:</p> <ul style="list-style-type: none"> • Development of an interpretive station near or at the proposed parking/staging area identified in T31N R12W, section 14 SW ¼, pursuant to appropriate funding and personnel. • Manage a ¼ mile corridor centered on the congressionally designated trail as a NSO area for new mineral leases and/or future renewable energy development. • This ¼ mile corridor will serve as the official National Trail Right-of-Way until such time as new information becomes available and/or the corridor is modified. • New routes designated within the ¼ mile corridor must meet the intent of the NTSA, be 	2.4, 2.5, 2.6	OSNHT	<p>Not all portions of a NHT are required to be managed in the same way. It is BLM's intent for the management of the OSNHT to be as consistent as possible with the management of the OSNHT as a whole, however, local conditions must be taken into account. Management of this portion and other portions of the OSNHT within the FFO boundaries will be consistent with the comprehensive management plan, once that is completed.</p>

Comment Summary	Section	Topic	Response
<p>nonmotorized in nature, and attempt to maximize the vicarious experience of the OSNHT.</p> <ul style="list-style-type: none"> • As additional information is acquired by BLM, modifications may be made to the size, location and/or management prescriptions of the corridor and/ or OSNHT. • This segment of the OSNHT may be managed independently from the trail as a whole. 			

Comment Summary	Section	Topic	Response
The establishment of a Controlled Surface Use (CSU) area for new mineral leases for a 200 foot corridor is not explained (Page 78) but does not seem based on the mandated dominant use of the OSNHT as a NHT. An activity plan for the proposed RMZ4 based on trail viewshed might warrant consideration of the CSU concept if it benefits the trail.	2.4, 2.5, 2.6	OSNHT	The 200 foot CSU corridor is consistent with the management objectives of Alternative B which would be to maximizes OHV use. The CSU designation would still provide adequate protection of the OSNHT.
There is no evidence in the EA that consultation has taken place on this “undertaking” under section 106 of the National Historic Preservation Act, implementing regulations in 36 CFR 800, Protocol Agreements or Programmatic Agreements or the coordinating regulations with NEPA under 36 CFR 800.8. The lack of evidence of consultation on adequacy of inventory to assess effects, or the different effects of the action alternatives suggests that the proposed Finding of No Significant Impact with respect to point 8, “no adverse effect,” of the proposed FONSI is unsupported	3.7, 4.1	Consultation	Please see our response to comment 16.08
Stating that the “route designation will comply with Section 106” (Page 47) does not make it so:	2.3.3	Plan Conformance	Clarification has been made on page 47 in reference to future route designations.
There is no effort to define the area of direct and indirect project effects (APE) with respect to the Old Spanish National Historical Trail. The mis--apprehension that the lack of so far detected physical characteristics of the OST does not eliminate the responsibility to assess whether the corridor may qualify as a “rural historic district” based on the integrity of setting.	2.1.2	NRRSM	Section 2.1.2 documents the natural resource recreation setting for the GRRRA and future desired setting. Additional information would be needed in order to determine if the NRRSM identified would meet the 'rural historic district' setting.
The Salida del Sol Chapter of the Old Spanish Trail Association requests consulting party status in the requisite consultation with the New Mexico Historic Preservation Officer.	4.1	Consultation	Consultation has already been completed. Consultation letters have been issued multiple times prior to this response being received.

Comment Summary	Section	Topic	Response
<p>There is no evidence that disused alignments in the Glade Run Plan Area have been assessed for disused historic trail alignments. Inventory for linear features and sites requires specialized techniques designed to identify such features and then conduct on the ground inventory of alignments to establish physical evidence and datable materials associated with the alignments. Historic context indicates that a wagon road should cross the northern section of the Glade and aerial photographs illustrate several alignments detectable by erosion and vegetative evidence that may be more than 100 years old and therefore qualify as “archaeological resources.” Even high density pedestrian transects which cross--cut the grain of alignments may not identify alignment features and particularly rare associated portable artifacts which qualify as archeological resources. This second preliminary EA does not address this issue commented on in the first review of the EA in April 2013 or the proposed OSNHT Activity Plan offered in March of 2012.</p>	<p>2.4, 2.5, 2.6</p>	<p>OSNHT</p>	<p>The alignment of the OSNHT is consistent with the congressionally designated line. Until either the comprehensive trail plan or additional information becomes available, BLM will continue to utilize this alignment for planning purposes.</p>
<p>On page 92 of the Plan & EA it is stated that: “Continuing right--of--way development as authorized in the 2003 Farmington RMP and analyzed in the 2003 Farmington PRMP/FEIS. This includes the proposed San Juan Basin Energy Connect (SJBEC) transmission line for which a Draft EIS is being prepared. [Italics added].” It would be “pre--decisional” to assume the San Juan Basin Intertie Transmission Line will be built. This statement should have stopped with the first sentence.</p>	<p>3.9</p>	<p>Realty</p>	<p>Nothing on page 92 indicated the contrary. The SJBEC project is still in the development stages and as such BLM has not yet made a decision on the project.</p>

Comment Summary	Section	Topic	Response
<p>This document fails to address the “recreation needs and opportunities” for “open air outdoor recreation” as contemplated in the National Trails System Act, not only on the designated OSNHT but also with respect to Urban Trails. As pointed out in the “purpose and need” the conditions in existence in 1996 are considerably different today. The demand for quiet, physically strenuous recreation and natural and historical sightseeing adjacent to the growing communities of Farmington, Aztec and La Plata is unaddressed in this management plan and proposed FONSI. A “balanced approach” would take account of not only the local interest groups for motorized recreation which consumes fossil fuels without addressing National priorities for physical fitness, but also the extent to which Glade Run is ideally situated for recreational activities which minimize fossil fuel consumption and maximize appreciation of natural and heritage assets.</p>	<p>2.4, 2.5, 2.6</p>	<p>Alternatives</p>	<p>The preferred alternative does provide for a balanced approach to recreation opportunities. This includes providing for non-motorized recreation uses, including hiking and sightseeing.</p>

Comment Summary	Section	Topic	Response
<p>ERROR: The agency has pre-determined that the GRRR will be designated as an SRMA and has not provided the range of alternatives as required by NEPA.</p> <p>DISCUSSION: Under the section Management Common to the No Action Alternative and All Action Alternatives, the agency has listed as an Allocation: “Recreation GRRR-CA-A- 1. The GRRR will be designated as an SRMA.”</p> <p>The agency has predetermined the outcome of the analysis by including this key decision in all of the alternatives, both the action alternatives and even the no action alternative.</p> <p>More evidence of the predetermination of the SRMA designation/allocation is clear from the “Issue” questions presented in the EA. Planning issues are supposed to be used to help develop alternatives for the management of the GRRR. Do these published planning issues sound like the agency was considering any other designation for the GRRR other than an SRMA?</p> <p>“Planning Questions</p> <ul style="list-style-type: none"> · What will be the boundary of the GRRR SRMA? · What recreational activities will be managed for in the GRRR SRMA? <p>Key Differences Between Alternatives</p> <ul style="list-style-type: none"> · Size of the GRRR SRMA” <p>Predetermination occurs when the agency commits itself to a certain outcome before it has completed that environmental analysis. <i>Forest Guardians v. U.S. Fish & Wildlife Svc.</i>, 611 F.3d 692, 714 (10th Cir. 2010). By not even considering another area designation for the GRRR and presenting no other designation possibility among its alternatives, the agency has committed itself to a certain outcome: the designation of the GRRR as a SRMA. Therefore, agency violated NEPA’s prohibition on predetermined results.</p> <p>The EA makes it very clear that the allocation of the GRRR as a SRMA is an amendment to the existing 2003 Farmington RMP/ROD:</p> <p>“1.4. Decision to be Made</p> <p>The BLM will decide whether or not to implement the GRRR R&TMP.</p> <p>Decisions that would amend the 2003 Farmington RMP include:</p> <ul style="list-style-type: none"> · Adoption of route selection criteria for future route designations for off-highway vehicles (OHV) use. · Designation of the GRRR a Special Recreation Management Area (SRMA). · Boundary amendments to OHV area designations (i.e., open, limited, and closed area designations). · Amendments to the GRRR boundary, as described in each alternative developed below. · Identify lands available to future R&PP leasing. · Identifying lands for potential future disposal through the R&PP leasing process.” <p>“Amendments to any OHV area designation, boundary changes to the GRRR as a whole, and the identification of lands as available for either R&PP leasing or potential disposal would amend the 2003 ROD/RMP. In addition, the adoption of route selection criteria, though identified as necessary within the 2003 ROD/RMP, and the formal naming of the GRRR as an SRMA would also amend the 2003 Farmington ROD/RMP.”</p> <p>As an amendment to the existing RMP, the agency must complete the required NEPA analysis: “The BLM regulations in 43 CFR 1600 and the NEPA process detailed in the CEQ regulations in 40 CFR 1500 guide preparation of plan amendments.”</p> <p>NEPA requirements for environmental documents include the requirement of considering alternatives: “Study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves</p>	2.1.2	SRMA	<p>The designation of the GRRR as an SRMA is to provide clarification. The GRRR was originally designated as an SRMA in the 1996 Recreation Management Plan. During the development of the 2003 RMP/FEIS BLM failed to carry forward this designation. Based on the level and diversity of use on the GRRR, not designating the area an SRMA would not meet the purpose and need.</p>

Comment Summary	Section	Topic	Response
<p>unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act.” The inclusion of the GRRRA being designated as an SRMA in all of the alternatives is also in violation of NEPA requirements that the alternatives encompass a range of actions. CEQ requires that: “the alternatives considered by the decisionmaker are encompassed by the range of alternatives discussed in the relevant environmental documents and that the decisionmaker consider the alternatives described in the environmental impact statement.” The CEQ’s NEPA’s Forty Most Asked Questions Question #1 further clarifies: “1a. Range of Alternatives. What is meant by "range of alternatives" as referred to in Sec. 1505.1(e)? A. The phrase "range of alternatives" refers to the alternatives discussed in environmental documents. It includes all reasonable alternatives, which must be rigorously explored and objectively evaluated, as well as those other alternatives, which are eliminated from detailed study with a brief discussion of the reasons for eliminating them. Section 1502.14. A decisionmaker must not consider alternatives beyond the range of alternatives discussed in the relevant environmental documents. Moreover, a decisionmaker must, in fact, consider all the alternatives discussed in an EIS. Section 1505.1(e).” It is clearly reasonable that other appropriate designations could be applied to the GRRRA (such as the ERMA designation explored elsewhere in these comments). It is also clear that the designation of the GRRRA is a key decision from which almost all other facets of the management plan will then flow. By arbitrarily limiting the “range” to a single solution, the agency has deprived the public and the decision maker of a legal (and defensible) range of alternatives to consider. RESOLUTION: Unfortunately, this is a fatal error for the published EA as it is clearly non-compliant with NEPA and CEQ regulations. The agency has no choice but to withdraw the current EA and author an EA with an appropriate range of analyzed alternatives to consider.</p>			

Comment Summary	Section	Topic	Response
<p>ERROR: The agency’s supplied definition of an “Extensive Recreation Management Area” (ERMA) is completely inconsistent with the referenced agency documentation.</p> <p>DISCUSSION: The agency provides the following definition for an ERMA within the EA: “ERMAs are administrative units where recreation management is only one of several management objectives and where a lower commitment of resources is required to provide extensive and unstructured types of recreation.”</p> <p>This supplied definition of an ERMA is completely inconsistent with the definition contained within the agency source document referenced within this same EA. The agency states: “The primary difference between an SRMA and an ERMA is the amount or level of management that is required to maintain the primary recreation settings and opportunities and if the primary recreation is structured or unstructured (IM2011-004, BLM 2011).”</p> <p>Yet, the referenced document clearly says something completely different. We present both definitions from IM2011-004:</p> <p>“ 1. Designation of Special Recreation Management Areas (SRMA). Definition. The SRMAs are administrative units where the existing or proposed recreation opportunities and recreation setting characteristics are recognized for their unique value, importance and/or distinctiveness, especially as compared to other areas used for recreation.</p> <p>2. Designation of Extensive Recreation Management Areas (ERMA). Definition. The ERMAs are administrative units that require specific management consideration in order to address recreation use, demand or R&VS program investments.”⁹</p> <p>IM2011-004 makes it clear that SRMA’s are areas that are recognized for their unique values as compared to other areas used for recreation. ERMA’s are areas that require specific management consideration in order to address recreation use, demand or investments. That is a fundamentally different definition than that presented by the agency within the EA.</p> <p>Why is the definition important? It goes to the heart of the question of whether an SRMA is the appropriate management classification for the GRRRA and whether the employment of Recreation Management Zones (RMZ’s) is the appropriate management tool for the GRRRA.</p> <p>The difference between the SRMA and ERMA is not merely the amount or level of management required to maintain the primary recreation settings and opportunities. An SRMA is specific to the uniqueness of the values, importance, and distinctness of the recreation. The same holds true for the RMZ’s, which are merely subdivisions of distinctness for that same recreation.</p> <p>The recreational opportunities defined by the RMZs are not distinct. So much so, that Alternative B and C eliminates one of the RMZ’s completely (Alt B eliminates RMZ 1 and Alt C eliminates RMZ 3). So much for the uniqueness of the recreation opportunities...</p>	2.1.2	SRMA	<p>Based on the Recreation and Visitor Handbook criteria, this area clearly meets the criteria of being a SRMA and not an ERMA. Please see response to comment 33.01.</p>

Comment Summary	Section	Topic	Response
<p>Put more simply, SRMA's and their subdivision the RMZ's are intended to protect and enhance the intrinsic uniqueness of the recreational opportunities contained and recognized within an area. They are not intended as a management tool to create specific recreational opportunities to serve specific niches and use patterns. The ERMA is more appropriate to the situation in the GRRRA. The definition within IM2011-004 for the ERMA fits the GRRRA exactly, "units that require specific management consideration in order to address recreation use, demand or R&VS program investments."</p> <p>RESOLUTION: Use the definition of SRMA's and ERMA's from IM2011-004 appropriately and apply the ERMA designation to the GRRRA. Eliminate the patchwork approach to managing recreation engendered by the RMZ's and eliminate the inherent use conflict created by embedding RMZ1 within RMZ2.</p>			

Comment Summary	Section	Topic	Response
<p>ERROR: Under Section 1.7.2, “Noise” is listed as an Issue Considered but Not Further Analyzed¹⁰. The agency then proceeds to analyze noise and present noise in its impacts in numerous sections of Chapter 3.</p> <p>DISCUSSION: The agency clearly lists “Noise” as an Issue Considered but Not Further Analyzed and states:</p> <p>“Accordingly, there would not be anticipated impacts to noise as a result of this planning effort.”¹¹</p> <p>But then in the space of the same section, contradicts itself:</p> <p>“However, any potential noise impacts of the proposed plan on wildlife, recreationists or adjacent residents will be assessed in these respective resource sections.”</p> <p>And, indeed, the agency spends a large of amount of time and space defining noise impacts to Wildlife, Special Management Species, Social and Economic Features, and Environmental Justice sections for all of the alternatives:</p> <p>“Temporarily, noise and activities associated with recreation use as well as continued energy development (including construction, drilling, and reclamation) may deter additional wildlife and/or their prey from utilizing the planning area and the immediate vicinity.”¹²</p> <p>“The increased activity, noise, and disturbed vegetation associated with recreation and other uses could result in the increased usage of the immediate area by some migratory bird species, while decreasing usage by other species.”¹³</p> <p>“Other disturbance factors include noise from OHV, compressors, oil and gas traffic, grazing, various community events.”¹⁴</p> <p>“Within San Juan County, growing OHV use and other forms of motorized recreation are generally perceived as having degraded the quiet atmosphere of the surrounding area. During weekends, particularly in the spring and fall, intensive motorized recreation use has resulted in periods of high decibel noise, vehicle-generated dust, littering, trespass on adjacent private lands, harassment and displacement of livestock, and damage to fences, troughs, and pipelines on both private and public lands. Non-motorized recreational users are perceived as generating much less noise, and somewhat lower levels of dust, but can otherwise are thought to create many of the same problems as listed above, including damage to livestock facilities and trespass.”¹⁵</p> <p>“Continued unmanaged noise, dust, and increased use of public land resources for motorized recreation could reasonably be expected to generally degrade the quality of life in the county and increase BLM and local government costs to monitor, regulate, and control the increase in visitors.”¹⁶</p> <p>“Noise and dust associated with increased use of the GRRRA may adversely impact minority populations that visit the GRRRA or live or work in the immediate vicinity.”</p> <p>“Noise” is also included as a factor in the Route Evaluation Form (Appendix A) which was used by the</p>	1.7.2	Noise	<p>Clarification to noise impacts have been made in section 1.7.2.</p>

Comment Summary	Section	Topic	Response
<p>interdisciplinary team to conduct route evaluation of routes considered in this EA.17 RESOLUTION: If noise is “not considered further”, remove the analysis of the noise and the taint of noise considerations from the analysis and conclusions presented in Chapter 3. Re-evaluate the trails considered without noise as a factor and incorporate those subsequent evaluations into the EA.</p>			

Comment Summary	Section	Topic	Response
<p>ERROR: The EA fails to take a comprehensive look (hard look) at all resource use aspects of travel management: recreational, traditional, casual, industrial, commercial, and educational, and accompanying modes, conditions, and impacts of travel on public lands.</p> <p>DISCUSSION: The agency begins their discussion of travel management planning within the EA with this statement: “Comprehensive travel management planning should address all resource use aspects, such as recreational, traditional, casual, industrial, commercial, and educational, and accompanying modes and conditions of travel on public lands, not just motorized or off-highway vehicle (OHV) activities.”¹⁸</p> <p>Yet, within two paragraphs, makes this stunning statement: “For the purpose of land use planning travel planning can be considered as two basic components, the designation of OHV area allocations and the designation of individual routes.”¹⁹</p> <p>We assert, most strongly, that comprehensive travel management planning needs to consider far more than just OHV area allocations and route designation. Recreation needs are only one, albeit the primary one within the GRRA, consideration for route designation. And, just as importantly, the impacts of the whole spectrum and community of travel users needs to be considered when analyzing the impacts of travel on the resources of the area.</p> <p>We brought this same concern forward in our earlier comments: “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.”²⁰</p> <p>We documented this error with numerous citations from the initial EA where the agency stated emphatically that travel management is more than just motorized or OHV activities. Those same assertions by the agency are still in this EA: “Comprehensive travel management planning should address all resource use aspects, such as recreational, traditional, casual, agricultural, commercial, and educational, and accompanying modes and conditions of travel on public lands, not just motorized or off-highway vehicle (OHV) activities (BLM 2005). Though historically focused on motor vehicle use, comprehensive travel management encompasses all forms of transportation including travel by mechanized vehicles such as bicycles, as well as the numerous forms of motorized vehicles from two-wheeled (motorcycles) and four-wheeled vehicles [all-terrain vehicles (ATVs)] to cars and trucks.”²¹</p> <p>The agency provided the following response to our earlier comment: The scope of the NEPA document is to analyze impacts from the propose [sic] Recreation and Travel</p>	1.5	Plan Conformance	<p>Appendix C of the LUP handbook lines out the allocation decisions that we make for travel management within a resource management plan. In making those travel management decisions we have considered the impacts on the entire community that utilizes the area.</p>

Comment Summary	Section	Topic	Response
<p>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. 22</p> <p>This directly and emphatically contradicts the approach described by the agency within this EA: “For the purpose of land use planning travel planning can be considered as two basic components, the designation of OHV area allocations and the designation of individual routes.”</p> <p>A careful and complete review of the material contained in Chapter 3 shows that while the agency has added a smattering of acknowledged impacts from other uses, the analysis in this document is still focused almost wholly on motorized recreation impacts.</p> <p>One of the most glaring of these omissions is in the Soil Resources section. Under the analysis and conclusions of the impacts to the soil resources, the agency provides the calculations of the impacts from the trails to soil resources:</p> <p>The agency has completely disregarded the impacts from the many roads throughout the area. As the area impacted (expressed in acres) is the metric used to make the comparison, it is logical that the area of the roads within the GRRRA should also be considered. The roads have many times the impact of the trails due to the much larger area impacted. In fact, we make the claim that the trails have only a negligible impact when compared to the roads and other oil and gas infrastructure base soil areas. And yet, the EA does not provide any data or analysis that takes into the account this much larger impact.</p> <p>RESOLUTION: We repeat the resolution we offered in last year. Unfortunately, it holds as true now as it did then. The Affected Environment and Environmental Consequences is the most important section of an environmental analysis document:</p> <p>“This section forms the scientific and analytic basis for the comparisons under §1502.14. It shall consolidate the discussions of those elements required by sections 102(2)(C)(i), (ii), (iv), and (v) of NEPA which are within the scope of the statement and as much of section 102(2)(C)(iii) as is necessary to support the comparisons.”23</p> <p>The agency has missed, by a wide margin, even the mark they set for themselves in the pages of this document, let alone meeting 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>			

Comment Summary	Section	Topic	Response
<p>ERROR: The current EA still makes extensive use of the illegal and inappropriate term “user conflict” in section 3.10 and confuses the public by misusing the term “conflicting use.”</p> <p>DISCUSSION: We pointed out in our March 2013 comment that the agency had illegally used the term “user conflict” in the previous version of this EA. In response to these comments, the agency has clarified their position. In the response to comments, the agency states: “BLM does not have the authority to manage user conflict. Chapter 3 has been updated to reflect decisions that BLM can make.”²⁴</p> <p>To add emphasis, the agency has made the exact same statement six times to six different comments submitted. We applaud the agency’s realization and very strong statement to the fact. However, the current EA still contains at least four references to “user conflict” in Section 3.10.</p> <p>Of even more importance, the current document now misuses the term “use conflict”. Use conflict is defined as two uses that are incompatible; for instance to harvest a tree for timber products and utilizing the tree for stream bank stabilization are conflicts of use. The two conflicting uses of the resource are mutually exclusive. Another example would be allow oil and gas leasing on lands that are designated VRM Class I or II (to borrow an example directly from the agency’s own Land Use Planning Handbook). Both examples are true conflicts in use; mutually exclusive choices of how to treat a resource.</p> <p>Motorized and non-motorized recreation on the same trail is not a “use conflict” or a conflict of uses. It is common, everyday occurrence on literally millions of acres of public land. Motorized and non-motorized use of the same trail is not a mutually exclusive choice. The agency has misused the terms “conflict of use” and “use conflict” repeatedly throughout the document. If one reads the document carefully for meaning, it is clear that the agency is still referring to “user conflict” when they use the terms “use conflict”, “conflict of uses”, and even simply “conflict”. And the agency has already emphatically stated that they have no authority to make any decisions to resolve user conflict.</p> <p>RESOLUTION: Complete the removal of the term “user conflict” from the document. Examine carefully the use of the terms “use conflict”, “conflict of uses”, and “conflict” to ensure that these terms are not being used to refer to user conflict. Remove or rewrite these sections to convey only true use conflict (mutually exclusive choices).</p>			<p>User conflict is the perceived negative interactions (conflict) that visitors may experience while recreating in an area. BLM attempts to reduce these perceived negative interactions by identifying the current and future desired Natural Resource Recreation Setting (NRRSM, Section 2.1.2) and by reducing use conflict in an area. The establishment of RMZs with specific management goals and the designating routes and trails reduced the potential for future negative interactions between users and also reduces interactions between different uses (i.e. OHV use and hiking).</p>

Comment Summary	Section	Topic	Response
<p>ERROR: The agency has made the claim that NMOHVA has been consulted in the preparation of the GRRR R&TMP. This is clearly a misrepresentation. The Farmington Field Office has, at no time, consulted with our organization in the preparation of this document.</p> <p>DISCUSSION: “Consultation” is a specific formal act required by statute or legislation: “Consultation involves a formal effort to obtain the advice or opinion of another agency regarding an aspect of land use management for which that agency has particular expertise or responsibility, as required by statute or regulation. For example, the Endangered Species Act requires the BLM to consult with the U.S. Fish and Wildlife Service (USFWS) or National Oceanic and Atmospheric Administration (NOAA)-Fisheries regarding land use actions that may affect listed species and designated critical habitat (see 50 CFR 402.14).”²⁵</p> <p>There is no specific statute or regulation that requires the agency to consult with NMOHVA (sad, but true). The agency is only required to engage NMOHVA under the auspices of public involvement: “Public involvement entails “The opportunity for participation by affected citizens in rule making, decision making, and planning with respect to the public lands, including public meetings or hearings . . . or advisory mechanisms, or other such procedures as may be necessary to provide public comment in a particular instance” (FLPMA, Section 103(d)). Several laws and Executive orders set forth public involvement requirements, including maintaining public participation records. The BLM planning regulations (43 CFR 1601-1610) and the CEQ regulations (40 CFR 1500-1508) both provide for specific points of public involvement in the environmental analysis, land use planning, and implementation decision-making processes to address local, regional, and national interests. The NEPA requirements associated with planning have been incorporated into the planning regulations.”²⁶</p> <p>And NMOHVA (as an organization and via our individual members) has been fully participating and fully involved in that public involvement process. We have made numerous comments, during scoping and during both public comment periods. We have exchanged correspondence with the Farmington Field Office on the topic of the GRRR on numerous occasions but each of these exchanges was initiated by NMOHVA, not the agency. We have been engaged in the planning process and will continue to be as is our legal right. But at no time have we been “consulted” with in the preparation of this document. To say we have been consulted is a complete misuse of the term as defined by statute and the agency’s own Planning Handbook.</p> <p>RESOLUTION: Remove NMOHVA and all other agencies, organizations, and businesses that do not meet the specific legal requirement for consultation from Section 4.</p>	4.1	Consultation	<p>BLM recognizes that NMOGA has participated in the process and does not mean to confuse formal consultation with this level of participation, therefore Chapter 4, table 53 has been clarified to correct this.</p>

Comment Summary	Section	Topic	Response
<p>The R&TMP will address site-specific actions needed to manage the urban interface pressures on public land near the City of Farmington (COF) and communities of Flora Vista and La Plata. The R&TMP addresses development and management of motorized and non-motorized trail systems, development to accommodate dispersed trail-based recreation needs, and analysis of other trail-based infrastructure. (p.1.)</p> <p>Open – The BLM designates areas as "open" for intensive OHV use where there are no compelling resource protection needs, use conflicts, or public safety issues to warrant limiting cross-country travel. However, motor vehicles may not be operated in a manner causing or likely to cause significant, undue damage to or disturbance of the soil, wildlife, wildlife habitat improvements, cultural or vegetative resources or other authorized uses of the public lands (See 43 CFR 8341). (p.25)</p> <p>BLM clearly states that it will address site-specific actions to manage urban interface pressures on public land. However, even though past public comments have identified the concern of Open Area RMZ3 being directly adjacent to private property, BLM has not proposed to modify the boundary of RMZ3 (Alternative A). By not modifying the southern (and western) boundary of the Open RMZ3 in Alternative A, BLM appears to be actively promoting use conflict and increasing the likelihood of future conflicts/confrontations. Further, as being of residents in a neighborhood just south of the current Open Area, we can provide many examples of use conflicts, public safety issues (i.e. illicit shooting), and degradation of fragile soils, vegetation, and impacts to cultural resources and great bird life. Limiting cross country travel along the southern edge of the Open RMZ3 area is fully warranted.</p> <p>We believe that the BLM should adjust the boundary round the proposed Alternative A RMZ 3 Open Area. Based on a review of Figures 20 and 21, Open Use Recreation Management Zone Roads and Trails (Alternative A), respectively, it appears that the BLM has established a network of roads and trails within RMZ 3. We believe that the currently proposed network and trails would provide adequate recreational opportunities and allow OHV access to a slightly reduced open use area. Please see attached map with suggested boundary adjustment to RMZ3 (Alternative A).</p>	Appendix C	Sign Plan	<p>New Mexico is a fence out (NMSA 1978, Section 77-16-1 (1909) and NMSA 1978, Section 66-7-363(C) (1978)), post out state (NM Stat § 30-14-6 (1996)). This means that it is incumbent upon private property owners to fence and/or post private property as such. Any trespass onto private property should be reported to the local sheriff's office, who has the sole authority to prosecute those charges. Through this planning effort, BLM has established a sign plan that is aimed to inform the public when they are leaving public lands and also identify open or designated routes (trails and roads).</p>

Comment Summary	Section	Topic	Response
<p>Section 3.7 excerpt – Cultural Resources</p> <p>With regard to RMZ 3, it is unlikely that all or even a majority of the acreage would be disturbed by recreational activity as there are some places inaccessible to any vehicle. In consultation with the SHPO, THPO, and others; any inventory or route evaluation for RMZ 3 would be focused on those areas most likely or historically used for such activity. Even in an open area, motor vehicles may not be operated in a manner causing or likely to cause significant, undue damage to or disturbance of the soil, wildlife, wildlife habitat improvements, cultural or vegetative resources or other authorized uses of the public lands (43 CFR 8341).</p> <p>This bizarre conclusion of direct/indirect impacts is almost beyond comprehension. We walk often in the current Open Area and see many areas disturbed by OHVs. There seems to be a major disconnect here with BLM, the agency charged with protecting public lands, and how OHVs utilize and “explore” new territory, making new routes where none previously existed. A favorite activity by many OHV users that we have observed over the years is to wait until just after a rain event, and then rip up new trails and paths (in an effort to get that full mud effect?). All the new trails and disturbed soil is “okay” because it is in an Open Area. When an OHV leaves a designated trail, significant or undue damage is what happens. How can the BLM, in all seriousness, insert a reference from 43 CFR 8341 saying that motor vehicles may not be operated in such a manner that damage is caused? To many, the point of having an Open Area is having free reign to do whatever they want on an OHV, regardless of the effects.</p> <p>Also, there are many places in the current Open Area that appear to have cultural resources (lithic scatters, groundstone, and numerous stained areas covered with cobbles) along the edges of washes that are utilized by OHVs. By designating an area as OPEN, the BLM is inherently implying that motor vehicles can be operated in a manner which will damage or disturbance to cultural resources (as well as soil, vegetation, or wildlife).</p>	2.4, 2.5, 2.6	RMZ	<p>The open area designation has been in place since 1996 and was carried forward into the 2003 RMP/FEIS. BLM has developed a range of alternatives for RMZ 3 that include reduced acreage, expansion, and the complete removal of RMZ3.</p>
<p>With reference to Figure 22 – Trail Designations for RMZ3 Alternative A, there is 4 wheel drive road (in red) demarcated on private property at the southern end of the RMZ3. Is this 4 wheel drive road (on private property) really a designated route? Has the property owner given permission for BLM to include this on their maps – suggesting it is an available route for people to use? That route is misleading and should be removed unless the property owner has given express permission to BLM to include it on BLM maps.</p>	2.6.2	Map	<p>Figure 22 has been amended.</p>

Comment Summary	Section	Topic	Response
There does however appear to be a risk that having the RMZ 1 (Non-motorized) zone running right down the center of the area with RMZ 2 (Motorized on designated routes) zones on both sides could provide a reason for future agitation by opponents to OHV use.	2.3.3, Appendix D	Trail Monitoring	RMZs 1 and 2 are limited to designated routes, which would led to a reduction in overall use conflict. Coupled with Appendix D Trail Monitoring, BLM has made allocation to monitor, identify, and remove any user created routes that may create additional problems in the future or not meet the management goals of the RMZs.
consider partnering with various user groups to resolve conflicts and promote education,	2.3.3	Partnerships	Allocations have been made within this planning effort to partner and collaborate with public and private entities or groups (GRRRA-CAA-MA-49 and GRRRA-CAA-MA-50).
stop illegal dumping	1.7.2	Law Enforcemen t	This is a law enforcement issue. Please see Section 1.7.2 and response to comment 38.02. BLM will continue to pursue partnerships to manage illegal dumping on public lands.
promote this area by leasing the acreage that the City of Farmington has expressed an interest in as soon as an application is submitted.	2.4, 2.5, 2.6	R&PP Lease	BLMs range of alternatives considers whether to lease the 980 acres as applied for by the COF. The preferred alternative also includes a reduced R&PP lease to the COF that would met their immediate development needs. Any future requests for an R&PP lease will be considered through site specific NEPA.

Comment Summary	Section	Topic	Response
The City of Farmington, PRCA Department is requesting that there be a north bound single track trail connecting the existing Anasazi Trail in Lions Wilderness Park to the existing Kinsey Ridge Trail, north of the end of Foothills Drive. In addition, we are requesting a south bound single track trail that would connect the existing Rigor Mortis Trail, to the north, with the existing Anasazi Trail, to the south, in Lions Wilderness Park. Please see the attached map indicating the City of Farmington's proposed routing of the above mentioned trails. Thank you for your consideration.	2.5.2	Trail Network	Per Figure 16, BLM has identified a connecting trail corridor, as proposed by the COF, for the RAR.
the creation of RMZ2 (non-motorized containing over 6000 acres) which is in the middle of RMZ1 (motorized) practically guarantees more future conflicts.	2.3.3, Appendix D	Trail Monitoring	Please see response to comment 37.01.
No advancement of limits of RMZ 1 area to the west beyond Plan A's designation.	2.4, 2.5, 2.6	RMZ	The RMZ boundary was established to maximize the non-motorized trail experience while not including major OHV routes, specifically the main Glade wash.
Open area to remain intact as well as integration of UTV Loop and adjoining OHV trails.	2.4, 2.5, 2.6	Trail Network	We have an identified ATV/UTV loop trail system that connects into the open area.
Retaining Cliffhanger trails in the OPEN area	2.4, 2.5, 2.6	Cliffhanger Trails	We are retaining the Cliffhanger Trails, as identified within each alternative, in the open area (RMZ 3).
Expansion and creation of motorized single track trails on west side of the GRRRA.	2.4, 2.5, 2.6	Motorcycle Trail	We have included a public request to expand the single track trail west, as shown in Figure 16 and Figure 18.
Keep cross over trails.	2.4, 2.5, 2.6	Trail Network	Cross over trails and designated roads have been identified in all alternatives

Comment Summary	Section	Topic	Response
Trails to be increased from 65 inches to 68 inches.	2.4, 2.5, 2.6	Trail Width	The alternatives provide for a wide range of trail widths, up to 75 inches.
implementing the UTV loop.	2.4, 2.5, 2.6	Trail Network	Please see response to 41.02
As a past resident of Farmington NM (1998-2011) I spent a lot of time in Choke Cherry running many of the world class 4x4 trails with various clubs and out of town folks that had come to do the same. I'm really hoping you look toward the future and keep the area open to people with four wheel drive Jeeps, Buggy's, etc as it brings quite a lot of revenue into the area and is a great spot for locals to meet and do trail runs.	2.4, 2.5, 2.6	RMZ	A portion of Choke Cherry (canyon) is in RMZ 3 and will remain open. A portion is in RMZ 2 and use has been identified for designated routes.
closing down too many trails only leads to over use of the trails that are left open. By leaving as many trails as possible open you will spread out the use and reduce the overall impact on the trails.	1.3	Purpose and Need	Leaving the entire Glade open would not ensure the protection of resources and allow for other potentially conflicting uses. This suggestions would not conform to the stated purpose for the RMP amendment.
incorporate the west boundary of Alternative B to be included in Alt A so it incorporates some more of the historical trails.	2.4	Boundary	Due to additional resource conflicts, BLM has decided not to consider modifying the boundary of the Glade to the west in Alternative A.
allowing some of the unsigned, but well established trails in the new plan, as they are already there and their allowance will reduce trail traffic in general	2.4, 2.5, 2.6	Inventory and Trail Network	BLM completed an inventory and route evaluation forms for each inventoried route. These provided the basis for developing a looped trail system and designating roads that would connect into the trail system.

Comment Summary	Section	Topic	Response
leave the Canyon alone	2.4, 2.5, 2.6	RMZ	Please see response to comment 42.01
Our request to close the eastern half of Section 21 is not included in either preferred alternative A or Alternative B. We were not able to find any reference in the EA to our comments or recommendations. The EA is difficult to interpret and understand making it hard to provide appropriate comments.	2.4, 2.5, 2.6	RMZ Boundaries	BLM has closed section 21 in Alternative C Figure 19. In the preferred alternative, BLM has changed the OHV area allocation from open to limited to designated due to the limited use the area receives and the topography that restricts impacts both ACECs and Jackson Lake wildlife refuge that exist on the valley floor.
In Alternative A, the eastern half of Section 21 is identified as part of Recreation Management Zone (RMZ) 2, although it is actually adjacent to RMZ 3 and disjunct from RMZ 2. This is confusing and potentially misleading. Maps on pages 70 and 72 (Figures 15 and 16) identify routes and trails in the eastern half of Section 21 that would be designated if preferred Alternative A is selected. However, the Figure 28 map on page 104 shows the proposed boundary of the open area for Alternative A to not include the eastern half of Section 21, excluding portions of the Glade Run Recreation Area. It appears that the east boundary of Section 21 is intended to be the boundary between open cross-country use of OHVs and motorcycles to the east and OHV and motorcycle use limited to roads and trails to the west of the Section boundary. It is unlikely that OHV and motorcycle users will recognize and follow this management directive and it will be difficult if not impossible to enforce.	2.4, 2.5, 2.6/Appendix C	Sign Plan	Allocations have been made for implementing a sign plan within the GRRRA (GRRRA-CAA-MA- 18, Appendix C). Routes are considered closed unless mapped or posted (signed) with an open or limited designation. All signage must be followed at all times. Because signs are at times vandalized or removed, the user is responsible for determining the correct mode of travel based on official maps. Official maps will be made available to the public. Additionally, a sign plan has been developed as part of this planning effort includes designated routes and boundary signage.

Comment Summary	Section	Topic	Response
<p>For Alternative B, the eastern half of Section 21 is identified as part of RMZ 3, as opposed to being identified as a disjunct part of RMZ 2 in Alternative A. Again, this is confusing and potentially misleading. Maps in Figures 23 and 24 identify routes and trails to be designated within Section 21 if Alternative B is implemented.</p>	2.5	Boundary	<p>Having the eastern 1/2 of section 21 remain open meets the management goals of Alternative B which are to promote OHV use. Based on the location and review of the trail identified, the route is located on top of the cliff and does not transgress into the valley bottom. As such, it is unlikely to have an impact on Jackson Lake Wildlife Refuge.</p>
<p>The Department strongly reiterates our request to prohibit motorized use on the east half of Section 21 as per the MOU. OHV and motorcycle roads and trail appear to drop off the escarpment that demarcates the western boundary of the Glade Run Recreation Area. Precluding OHVs and motorcycles from continuing westward into the riparian habitat and Jackson Lake WMA in the La Plata Valley would be difficult to enforce. The Department is concerned about the potential for unrestricted OHV use immediately adjacent to the Jackson Lake Wildlife Management Area (WMA). Regular OHV use along the escarpment in the east half of Section 21 and along the boundary of Section 16, leased by the Department from the State Land Office for wildlife habitat, will very likely significantly degrade the quality of wildlife habitat in the eastern part of the WMA .</p>	2.4, 2.5, 2.6	RMZ Boundaries	<p>Please see response to comment 46.01.</p>

Comment Summary	Section	Topic	Response
<p>The Department understands that Alternative B, as presented by the BLM Farmington Field Office, may provide the best recreational experience for off-highway vehicle (OHV) users. The BLM's preferred alternative, Alternative A, creates concerns for the Department in regards to OHV access and user conflict. By going from the current system where cross country travel is allowed, to any of the alternatives presented by the BLM where OHV operation will be limited to designated routes, a significant reduction in recreational access will be experienced. A loss of recreational access causes more users to utilize a smaller area which results in user conflict and a loss of satisfaction with a recreational experience. Dissatisfaction with loss of access can be mitigated by selecting alternative B, which creates the most miles of designated OHV trails in the Glade Run Recreation Area.</p> <p>The Department has concerns with the separation of areas where motorized recreation is acceptable, a situation that would be created under Alternative A. The creation of a nonmotorized area (RMZ 1) in between two motorized recreation areas (RMZ 2) without a designated travel corridor for OHV users will lead to encroachment and user conflict. The separation of areas will also create enforcement issues for BLM and Game and Fish Officers alike. If the BLM chooses to pursue the preferred alternative, alternative A, The Department recommends the elimination of the non-motorized recreation area, RMZ 1, and instead focuses efforts on creating specific routes within the Glade Run Recreation area that are enjoyable to both motorized and non-motorized recreationists. These are conditions that could be met under alternative B.</p>			<p>While RMZ 1 forces' management on non-motorized use, motorized routes have been identified to create conveyance corridors across RMZ 1 to other areas throughout the GRRA.</p>
<p>Open riding areas provide creation of beginner loops, and skills practice trails. These riding areas also provide the OHV rider with the ability to select a specific piece of terrain to practice needed skills for safe and successful trail navigation. Open riding areas disperse recreational users and reduce the likelihood of user conflict. Open areas also provide locations for motorcycle trials riding, an OHV discipline that focuses on slow-speed balance and control. The minimal impact of trials riding is one reason for long-term access to BLM properties such as the San Ysidro Trials Area and Haystack Mountain OHV area. All three alternatives incorporate the creation of the open riding area. In Alternative B, RMZ 3 encompasses a larger area thus potentially reducing concentration of riders. The Department understands the need to incorporate an open riding area although we have concerns about concentrating riders in an area adjacent to the WMA. At a minimum, the Department recommends excluding the eastern half of Section 21 from the open riding area to facilitate enforcement and protect wildlife habitat.</p>	<p>2.4, 2.5, 2.6</p>	<p>RMZ Boundaries</p>	<p>Under the BLM preferred alternative A, the eastern 1/2 of section 21 is excluded from RMZ 3 (the open area).</p>

Comment Summary	Section	Topic	Response
<p>In order to provide satisfactory recreational experiences, maintain historical access, and to minimize user conflict the Department recommends that the BLM consider modifying Alternative B. as described above, to better protect wildlife habitat while still providing the greatest range of OHV recreational opportunities.</p>	2.3.4, 2.4, 2.5, 2.6	Alternatives	BLM's analysis has showed that Alternative A, the preferred alternative, allows for a range of OHV activities while allowing for the protection of wildlife, cultural and other resources.
<p>My main concerns with any Alternate Plan for the GRRA are the Open Area and maintaining a reasonable inventory and use of OHV trails in both the Limited Use Area and the Open Area. I don't feel that the loss of Open Area on the East side (for the City of Farmington's Park Expansion) is a severe forfeiture. I do feel that any advancement of limits (of RMZ 1 Area) to the West beyond Plan A's designations, would be completely unwarranted. The Open Area draws users from around the world to Farmington to recreate. Depletion of the Open Area would not only be dissatisfactory for our User Group, but also would not be favorable for the local economy. What remains of the Open Area must be kept intact as well as integration of the UTV Loop and adjoining OHV trails.</p>	2.4, 2.5, 2.6	RMZ	BLM's preferred Alternative A maintains an open area (RMZ 3) within the GRRA.
<p>I also support the recommendation of retaining the Cliffhanger trails throughout the Open Area as UTVs also utilize them. I also support expansion and/or creation of motorized single track trails on the west side of the GRRA. This will greatly reduce the chance of motorcycle versus UTV incidents.</p>	2.4, 2.5, 2.6	Cliffhanger Trails	The majority of cliffhanger trails are in RMZ 3 and are open for travel. The remainder are in RMZ 2 and identified for designation. Additionally, per public comment, allocations have been made to expand the single track motorized trail to the west, maintaining a looped system.
<p>It is of extreme importance to keep cross-over trails (other than the Flora Vista Road) from the Flora Vista area to the GRRA.</p>	2.4, 2.5, 2.6	Trail Network	Conveyance routes have been identified across RMZ 1 for OHV access to other areas within the GRRA.
<p>The OHV User Group requests that the 65 inch limit for ATV/OHV Trails be increased to 68 inches minimum, due to the fact that many OEM units that might have wheel and tire swaps(popular modification to UTVs), will exceed 66 inches.</p>	2	Alternatives	This is covered within the current range of alternatives.

Comment Summary	Section	Topic	Response
The open area and limited use area should be marked clearly with signs for identification and explanation. The kiosk at the entrance should have maps and clear directions and regulations. There should be a sign at the entrances listing fines for dumping and other destructive activities.	2.3.3	Sign placement	Please see response to comment 11.03.
I have a few additional recommendations. I recommend a remote RV area in the immediate vicinity of Brown Springs. This will provide a much needed camping area for those traveling from distances to enjoy the GRRRA.	2.3.3	Sign placement	Please see response to comment 11.03.
These divisions ring of "conflict avoidance" and social engineering, which BLM has agreed is outside its authority. In the final EA please provide the rationale for these RMZ's.	2.1.2	RMZ	Establishing RMZs is a tool BLM can use to provide for more defined recreation opportunities in an area. The RMZ boundaries were developed and refined through the scoping process and an assessment of the current recreation uses within the GRRRA. RMZ 1 was identified as an area that lent itself to a non-motorized experience, and RMZ 2 was identified to meet the general goals of multiple use recreation on a designated route system. RMZ 3 encompasses the current open area. By identifying these areas and their associated "niches", BLM can focus on specific recreation needs that meet the objectives of the RMZ and ultimately reduce the potential use conflicts that can occur.

Comment Summary	Section	Topic	Response
<p>Digitized mapping makes it very difficult for reviewers to determine what is open and what is closed. Some routes that are obvious on the ground have no line digitized over them. Another important item of confusion is that there are lines digitized where there are obviously no routes. The reviewer cannot tell what BLM is committing to.</p>	2.1.3	Inventory	<p>A route inventory is done to identify routes and route specific properties in a given area. For the GRRA, BLM staff digitized routes using ArcGIS software and then field checked each route to identify specific route properties such as width, surface material, etc. These inventoried routes are then individually reviewed and transportation decisions made on them (open, limited, closed; limited to what, etc.). The inventoried routes within the GRRA are shown on Figure 4. Designated routes can be seen in Chapters 2.4 - 2.6.</p>
<p>Another example showing the difficulty of identifying what BLM is committing to do is found in Figures 11 and 12. Figures 11 and Figure 12 confuse reviewers, because the two maps raise the question, are there only two designated routes in RMZ 1 as shown in Fig. 12 or are there many, as shown in Figure 11?</p>	2.1.3	Inventory/ Routes versus Trails	<p>Figure 11 shows designated routes within RMZ 1 and Figure 12 shows designated trails within RMZ 1. The difference between routes and trails is that routes cover linear features more commonly through of as dirt roads. Some routes are trails but not all trails can be routes. There are two trails shown on Figure 12, the main branch of the Road Apple Rally and the northern part of the equestrian loop.</p>

Comment Summary	Section	Topic	Response
<p>In the final EA please provide the reader with one comprehensive map showing all of the routes (roads, trails and primitive roads) that will be available for public use.</p>	<p>2.4, 2.5, 2.6</p>	<p>Inventory</p>	<p>Based on the number of routes, a comprehensive route map would be unreadable. For Alternative A, routes can be reviewed on Figures 11, 15, and 21. Regarding signs, please see response to comment 11.03.</p>
<p>The Cliff Hangers are pleased to see that the open area (RMZ 3) has remained intact in the preferred alternative. The only issue appears to be an oversight that we would like to have corrected. In the southwest portion of RMZ 3 we find that a short section of the Intimidator Trail is outside of the zone in another (unidentified) polygon with an irregular western boundary. If the western edge of RMZ 3 were to be relocated westward 400 feet the trail could be included in the open area identified by RMZ 3. Please refer to the illustration: The green line is our proposed boundary in order to include the trail. Another option is to designate the short section outside the zone. Make it a designated 4WD route with an identifier, which does not presently have in this plan.</p>	<p>2.4, 2.5, 2.6</p>	<p>Cliffhanger Trails</p>	<p>BLM has made allocations to either designated the trail as part of RMZ 2 (Alternative A) or keep it as part of the open area (RMZ 3, Alternative B). The boundary in section 21 was established to allow for the recreation use of the area (e.g., Intimidator Trail) but also protect the other resources located on the valley floor (i.e., Jackson Lake Wildlife Refuge).</p>