

Appendix I. Public and Agency Comments and BLM Responses

**Name of  
Draft Review  
Commenter**

Rod Merritt Fly  
Fishing,  
Comment #1

**Public Review Comment Submitted to  
Rawlins Field Office**

Chris, I will comment on public access and changes to existing access points.

1) Yes, there a few weekends (2 or 3) that the river at Bennett Peak sees crowding. As an outfitter I have learned to just stay away from that access point during that time frame. A wider boat ramp would be a good improvement just so you were not waiting on the slow moving group in front of you. But I don't see a need for the Bennett improvements if the Corral Creek river access improvements take place. My guess is 90 % of the public as well as outfitters would just put in at Corral Creek. It's closer, more scenic river banks, and you pick up about a mile of floatable water. I am the only outfitter in 10 years that has ever carried their rafts over that fence and down the trail at Corral Creek for those reasons I just listed. I look ahead to the days when I won't be an outfitter. As (joe public) I would never put in at Bennett Peak again if corral creek has a drift boat ramp. However camping is much better at Bennett with shrubs and trees.

**BLM RFO Response to Public Comment**

1) The Bureau of Land Management (BLM) has already considered the scenario concerning the dispersal of use away from Bennett Peak boat ramp if Corral Creek was provided a boat launch and river access. There was overwhelming support from outfitters in the December 18th public meeting and the follow-up outfitters meeting in January of 2013 to provide a boat launch at Corral Creek. Also, in these same public meetings as well as the interested agencies and BLM Interdisciplinary (ID) team meetings, the improvements proposed for Bennett Peak received overwhelming support. The substance of this comment on dispersal is addressed and considered in the range of alternatives for both recreation sites. The BLM Rawlins Field Office (RFO) will consider this comment in selecting from the range of alternatives which includes the No Action alternatives presented in the key actions for both the Bennett Peak and Corral Creek campgrounds. This comment will also be given full consideration by the BLM RFO ID Team for the site-specific analysis of Corral Creek required for the forthcoming National Environmental Policy Act (NEPA) document tiered to this Environmental Assessment (EA).

**Name of  
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Comment #1,  
cont...

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2) I think a BOAT IN CAMPGROUND on the lower river would be a great asset. I would like to see two or three campgrounds between Old Frazier and I-80 even if it was just improved camp sites and a picnic table with a canopy. This is a wonderful stretch of river that sees almost no use due to access. I don't have a map in front of me to suggest where the locations might be. But something that would allow for a multi-day float.

**BLM RFO Response to Public Comment**

2) The BLM will consider this comment as support for the Preferred Alternative for the Boat-in Campground. This comment will also be considered by the BLM ID Team for the site-specific analysis of the Boat-in Campground required for the forthcoming NEPA document tiered to this EA.

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**Public Review Comment Submitted to  
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3) As far as the PROSPECT RECREATION Site: the road definitely has to change for a safety issue. I don't get the idea of one improved camp site. Why bother? People are going to drive in and hope that no one else is camped there? That's quite a trek on pure hope and luck. Campgrounds exist right across the river. Or why not put on three improved camp sites if space allows.

**BLM RFO Response to Public Comment**

3) The Prospect Recreation Site receives low visitor use for camping and boat launching currently. Prospect Creek does currently provide an abundance of opportunities for dispersed camping throughout the recreation site. A recommendation for a single campsite at Prospect Creek was provided by an outfitter in the January 2013 outfitter meeting. In the limited topography suitable for the requested camping site at the launch area, it would be difficult to create more than one camping site along with enlarging the turnaround and parking area. In consideration of this comment and other comments from the public, the BLM RFO field manager has decided to change the Prospect Recreation Site Preferred Alternative to exclude any camping sites at Prospect Creek and to allow for some primitive opportunities to exist for outfitters and the public who have also provided multiple comments that they would like the opportunity to remain for escaping the crowds on peak weekends. This change is consistent with the Prospect Creek area's current designation as an Undeveloped Recreation Site in the 2008 RFO RMP. This comment will also be communicated to the BLM ID Team for the site-specific analysis of Prospect Creek required for the forthcoming NEPA document tiered to this EA.

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4) BIG CREEK: Well the existing route stinks. I used it in years past but too many flat tires. Too each is own I guess. The camping here is rough. Dry, arid, noisy from ABarA road, and Mosquitos will eat you for a snack. The river flows here on the Platte are crucial for any kind of floating use. Before the last flood year the minimum flow to get from Big Creek to Bennett was 280 cfs. Now the river is a lot wider. There will be major arguments of floating, portaging, and trespassing when access to Big Creek area opens up. If the new road in is good and the drive shortened in comparison to what it is now I can see Big Ck to Bennet Peak big first choice for outfitter operations. Easing some of the crowding at Prospect and Bennet for early runoff fishing season.

**BLM RFO Response to Public Comment**

4) The BLM will consider this statement as the commenter's support for the Preferred Alternative in Key Action 7, which, if selected, would shorten the drive in comparison to the FS 211 improvements proposed in Alternative 1. This comment will be communicated to the BLM ID Team for the site-specific analysis of Big Creek required for the forthcoming NEPA document tiered to this EA. Portaging to carry a craft onto private land when navigating around an obstacle, such as rocks on a low section of river, is permitted under current State of Wyoming regulations. See the Wyoming Game and Fish Department's Wyoming Fishing Guide (page 5): [http://wgfd.wyo.gov/web2011/Departments/Fishing/pdfs/WGFD\\_FISHINGGUIDE0000393.pdf](http://wgfd.wyo.gov/web2011/Departments/Fishing/pdfs/WGFD_FISHINGGUIDE0000393.pdf) and below response to Garry Miller's comment concerning case law established in the 1961 Wyoming Supreme Court decision of Day v. Armstrong.

**Name of  
Draft Review  
Commenter**

Rod Merritt Fly  
Fishing,  
Comment #2

**Public Review Comment Submitted to  
Rawlins Field Office**

KEY ACTION. #3. SRP Allocation

1) Chris, here is my comment/ views on possible new permittees for 2013. First and foremost I have not forgotten that at one point I didn't hold any permits though any government agencies. As I comment here I am walking a fine line that effects my income. I do think there is room and another or others should hold a Special Recreation Permit. Some current holders do not use the resource perhaps as much as they once did or had planned to. Including myself. But water levels play a major role in that use. Some of us have been guiding for twenty or more years here and flows are the one variable. Even more than the economy. Once I obtained a USFS permit then that opened up my guiding opportunities on other lands. With that said. The so called "waiting list" if it does exist has been floating around in word for sometime( at least 10 years). I think it is very important that if those people on the list still have a desire to be permitted and are a viable operating outfitter/guide service then they should have the opportunity to apply and receive consideration. If I was to see the list I would offer non bias opinion.

**BLM RFO Response to Public Comment**

1) At the requests to consider "viability" by outfitters in the January 2013 outfitters meeting, the BLM RFO is in the process of seeking First Aid/Cardio Pulmonary Resuscitation as an SRP stipulation in order to provide some form of legitimacy and credentials beyond the BLM's current minimum requirements (i.e., insurance, see BLM Response #5 below) for floating and fishing SRPs on the North Platte River SRMA. This request was proposed to the BLM state office as a direct response to recent input from outfitters to consider legitimacy and safety on the river in the SRP approval process. This type of SRP stipulation is discretionary for the RFO and does not need to be included in the language of the NPRRAMP EA.

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Fishing,  
Comment #2,  
cont...

**Public Review Comment Submitted to  
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2) While 6 is a number to be considered I think 2 should be the maximum for receiving a SRP.

3) Some of your interested applicants who were at this last meeting have a history of guiding other places in the state without permits even though they are required.  
It makes no economic sense to give SRP to someone who wants to guide 6 days a season on these waters and has home base elsewhere. They show up guide their guests and leave, maybe with a tank of gas purchase, use the resource and dump no \$\$\$ into the local economy. This just takes away from your local outfitters and businesses livelihoods.

4) My big concern and I will be forthright with it. Brush Creek Ranch does not need a BLM SRP. Nor does PHil Mcgrath if he is still their head fishing guide/coordinator. They have pushed their own private access into the river corridor above Corral Creek. Where they wade fish and launch boats for guiding. I do contract guiding for Brush Creek and make good additional income from it.

**BLM RFO Response to Public Comment**

2) The commenter's proposed restriction of the number of SRP releases to two every other year would be more consistent with the social conditions provided in Alternative 2 within Key Action 3. Alternative 2 states that three SRP requests would be considered every other year. Therefore, a similar number of SRP releases to those that the commenter desires are considered in the range of alternatives. The BLM has given additional consideration to this comment and has decided to change the SRP release schedule, in the Preferred Alternative, of to "up to six" SRP permits every other year rather than an exact "six" in order to consider conditions and respond more readily if and when SRMA objectives are not being met (2008 RFO RMP, pg. 2-27).

3) The BLM has provided the BLM Law Enforcement Ranger this comment concerning potential permit violations. The LE Ranger stated that he will monitor closely for future permit violations. Prior infractions of regulations concerning permitting can be considered in the SRP application and approval process. The BLM cannot discriminate, under SRP handbook guidelines, as to the locality of SRP applicants within the region.

4) The BLM cannot discriminate among SRP applications and approvals based on whether an SRP applicant owns lands adjacent to the river that are currently used to launch craft onto the river or based on whether they hold a USFS permit upstream from the SRMA. Within the Recreation Permit Administration Handbook there is no guidance that would provide the above stated preference:

The SRP Handbook (pg. 21), states that the issuance of an SRP includes the following:

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Commenter**

Rod Merritt Fly  
Fishing,  
Comment #2,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

But, here is what takes place. Last year we drove in on this Brush Creek River Access with 5 or 6 guests to wade fish. More than 1/2 the group fished on public lands and the remainder on Brush Creek private land. I kept thinking to myself how upset I would have been had I (joe public) hiked into fish here for a day and here sits a suburban full of anglers who drove in and took control of the resource. I was ashamed to be a part of it. BCR fishing activity program is 99% on private lands which they own. 80% of their fishing trips are for 2 1/2 hrs in the am or 2 1/2 hrs in the p.m. Why do they need more access. They have a place to launch and take out. They hold a USFS permit ( which they use minimal) for floating which allows take out at Bennett Peak and with their private access they can put in on Platte and take out at Treasure Island or Bennett. I thought it was un-reasonable to allow them to have a permit for wade fishing at Bennett. All this did was infringe on the public trying to get off the beaten path. I just don't understand why Big Money always wants it all. Their has been talks of Brush Creek Ranch purchasing the old Sanger Ranch above Bennett. If that takes place then what. Now BCR controls even more

**BLM RFO Response to Public Comment**

**“1. Submitted a signed operating plan; 2. Provided a copy of an appropriate insurance policy for new permits or a valid certificate of insurance; (See Paragraph N. Insurance and Liability section.); 3. Financial capacity to complete and maintain the proposed project or carry out the activity; 4. Complied with terms or stipulations of previous permits issued by the BLM or other land managing agencies or State agencies for similar activities; 5. Paid estimated fees in advance; 6. Obtained necessary federal, state, or local licenses; 7. Obtained bonds or cash deposit, if required; and (See Paragraph M. Bonds); 8. Submitted other information required by the authorized officer in advance of issuing the permit. This may include a list of names, i.e., employees or others, authorized to do business on behalf of the applicant and any limitations upon their authority.”**

<http://www.blm.gov/style/medialib/blm/wy/programs/recreation/srp.Par.80009.File.dat/SpRecHandbook.pdf>

If the moratorium is lifted through selection of the action alternatives in the North Platte Recreation Area Management Plan EA (NPRRAMP EA), individual applicants on the waiting list would be given full consideration in their applications along with any other potential SRP applicants on the waiting list. With that said, all SRP approval decisions are at the discretion of the BLM and individual SRP approval decisions are outside of the scope of this EA.

**Name of  
Draft Review  
Commenter**

Brian Shipley,  
Kingfisher  
Drifters

**Public Review Comment Submitted to  
Rawlins Field Office**

1) I wanted to comment that I go along with most of your preferred alternative assessments. I approve of the increase in size of the Bennett Creek boat ramp and parking area.  
2) I think the installation of a new boat ramp at Corral Creek would be a good idea, as it will spread the use out from Bennett Creek.  
3) I like the idea, item 1, of boat in access sites all along the river to I-80. Boat in camping is used heavily on the Green River in Utah. As use increases, registration at upstream boat launches can be made to secure camping sites.  
4) I also approve of road improvements on Key items 6 and 7.  
5) Other options for spreading use out on the upper river to lower river would be to improve camping and Pit toilets at Pick Bridge and Old Frazier.  
6) You mention that motorized boats are not allowed above Saratoga, although I see them in the water. I believe motorized boats should be restricted all the way to I-80. Just to mention, I have seen otter in the river above Treasure Island. I have been floating the Upper Platte for over 20 years. I know a lot of people don't like change, but for the most part I think the recommendations are moving in the right direction.

**BLM RFO Response to Public Comment**

1) The BLM will consider this statement as support for the Preferred Alternative at Bennett Peak Campground.  
2) The BLM will consider this statement as support for the Preferred Alternative at Corral Creek Campground.  
3) The BLM will consider this statement as support for the Preferred Alternative for the Boat-in Campground.  
4) The BLM will consider this statement as support for the action alternatives to improve roads, parking, and river access at Big Creek and Prospect undeveloped recreation sites.  
5) The BLM has not received previous input to provide a basis to establish "opportunities for action" for the commenter's proposed developments at Pick Bridge and Old Frazier. However, the RFO field manager and NPRRAMP ID Team will now consider this comment for any future tiered NEPA documents that would cover the planning area for that section of the river and provide site-specific analysis in the future that includes this consideration for Key Action 1.  
6) The BLM does not establish or enforce laws on the surface waters of the North Platte River. The Wyoming Game and Fish Department Game Warden would need to be contacted to address this comment concerning motorized boating.

<b>Name of Draft Review Commenter</b>	<b>Public Review Comment Submitted to Rawlins Field Office</b>	<b>BLM RFO Response to Public Comment</b>
Brian Shipley, Kingfisher Drifters, cont...	7) A way to increase revenue would be to charge an access fee or boat launch fee to the public. Outfitters pay a use fee and shouldn't be double charged. Also, garbage collection in certain locations would be great.	7) The suggestion of a public access or boat launch permit fee has not been previously identified as an issue of concern in numerous meetings and requests for comments prior to the Draft NPRRAMP and EA being released to the public. With that said, the BLM RFO Outdoor Recreation Planner did ask for the NPRRAMP BLM ID Team and Interested Agencies to consider a day use fee to support the proposed Leave-No-Trace program. A day-use fee for Bennett Peak and Corral Creek was discussed in the Interested Agencies meeting on November 29, 2012. This day-use fee was not supported by the preponderance of input at this meeting. Day-use fees were also not supported by the preponderance of input provided by BLM ID Team members when the topic was introduced for these two recreation sites.

**Name of  
Draft Review  
Commenter**

Steven Heinitz,  
North Platte  
Trouters

**Public Review Comment Submitted to  
Rawlins Field Office**

1) I just wanted to take this opportunity to comment on your Key Action: Leave-no trace. I see this action as having little change to what is currently occurring on the river now. We all have the ability to leave-no trace or not. In fact, I believe that most, if not all outfitters currently utilize this concept but referring to your BLM Ramp plan of 95%/5% private boaters to outfitters it would seem that most of the education on the river would apply to the private boaters or anyone else in this wilderness. This being said, your current plan on a voluntary basis leaves no opportunity for any kind of enforcement, just education with no "meat" or conviction to it.

I suggest making the measure mandatory. This would allow for the BLM to place educational materials only once at the boat ramps without having to change information later, if or and the measure became mandatory in the future. Reducing expense to the BLM budget and taxpayers.

**BLM RFO Response to Public Comment**

1) The North Platte River SRMA is designated as Middle Country and no portion of the SRMA is considered as wilderness or under study for wilderness designation. The Preferred Alternative for Key Action 2 states the following: 1) "provide ongoing monitoring to determine adaptive management" and 2) "if unacceptable impacts are identified, mitigation measures would be implemented." As part of adaptive management and monitoring, the BLM can consider a future regulation requiring carry-in/carry-out or other mitigation strategies such as additional restrooms. Within the range alternatives, the BLM will give full consideration of your comment with regard to the requirement of LNT practices including carry-in/carry-out. Also, with consideration to this comment and to avoid confusion, the Preferred Alternative for Key Action 2 now provides the example of "requirements for carry-in/carry-out" as a possible, future implementation action under this alternative if monitoring data indicates the need for this level of adaptive management to meet SRMA objectives.

<b>Name of Draft Review Commenter</b>	<b>Public Review Comment Submitted to Rawlins Field Office</b>	<b>BLM RFO Response to Public Comment</b>
Steven Heinitz, North Platte Trouters, cont...	<p>Second, I would allow everyone to be given a first year warning, (not citing) and using that opportunity to enstall education immediately, reinforcing the idea by a ranger or warden the individual or group has been given a written warning and a second offence would be a formal citing. Guarenteed, having received a warning they would not wish to receive a second, and by the next year of enforcement, compliance would happen quickly if the move to manditory leave-no trace compliance is what the BLM wishes. I personally believe education by authority enstills compliance rather than self education. We all, privates and outfitters benefit from these ideals and policies if we can all abide by them. There is only one North Platte River.</p>	Same as Response #1

**Name of  
Draft Review  
Commenter**

Jim B. States

**Public Review Comment Submitted to  
Rawlins Field Office**

1) Under the Section on Purpose and Need on page 2 it is stated that the proposed Recreation Area Management Plan (RAMP) would update the 1985 RAMP for the North Platte River Special Recreation Management Area (SRMA) and lists as two of its four objectives 1. maintaining and enhancing recreation opportunities to accommodate existing niche activities and 3. maintaining or improving the quality of river-related recreation experiences and provide high-quality recreation experiences and benefits. All of the following comments relate to fishing on the SRMA as the primary niche activity that was recognized in the 1985 RAMP as needing to be maintained or improved.

2) My overall concern with the proposed RAMP stems from its documentation that significant increases have occurred in usage within this niche during the 18 years intervening between this RAMP and the last, “exceeding social condition indicators for Middle Country settings at recreation sites within the SRMS” (RAMP, p. 4), identifying 13 key issues resulting from the required National Environmental Policy Act (NEPA) analysis and proposes 7 key actions to address those issues.

**BLM RFO Response to Public Comment**

1) To address this comment, the NPRRAMP EA now contains a list of all SRMA Management Objectives on pg. 2. Page 2-27 of the Rawlins RMP describes the niche activities as including "hunting, fishing, camping, wildlife viewing, Off-Highway Vehicle (OHV) touring and other uses as appropriate."

2) A comment from WGFD concerning the previous recreation planner's determination from the 2010 encounter data reported in Table 4 (pg. 50) has been received. Based upon a comment from WGFD, as well as the guidelines for Middle Country reported in the matrix, the BLM has now determined that the range provided in the Recreation Settings Characteristics Matrix for Middle Country standards was not exceeded, as reported by the previous recreation planner, and the term “exceedance” has now been removed from the NPRRAMP EA.

**Name of  
Draft Review  
Commenter**

Jim B. States,  
cont...

**Public Review Comment Submitted to  
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However, in Section C (Alternatives for Future Consideration) only 3 of the proposed actions are “Alternatives Given Full Analysis” and therefore subject to immediate implementation. The document cites the lack of a detailed, site-specific analysis as the reason that 3 of the remaining proposed actions in the preferred alternative will be deferred and dealt with under NEPA documents yet to come. We are left pretty much in the dark as to when or even whether the 7th proposed action, to provide road and launch improvements at Big Creek, will be implemented.

Based upon the above information, there are two key points that need to be made in support of an alternative decision framework that I will recommend:

3) 1. The “deferred alternatives” have been under discussion for more than the 18 years since the last RAMP was approved and we have been in the NEPA scoping process for the last 3 of those years; yet the RAMP opts for “deferring” these alternatives into yet another indefinite future.

4) 2. The site-specific information provided for actions to be immediately implemented is little or no better than the information provided for actions that are deferred.

**BLM RFO Response to Public Comment**

3) The alternatives considered for future site-specific analysis will be analyzed in the coming field season. It was decided by the BLM ID Team and RFO management that further site-specific analysis was needed and would be addressed in tiered NEPA documents (i.e., cultural and hydrology surveys needed, see below Response #3). Furthermore, the NPRRAMP ID team decided that it would be appropriate to present all proposed and future projects for the North Platte RAMP planning area in an initial, broader document to provide the public the opportunity to comment early in the process if changes needed to be considered in the future projects analyzed in tiered NEPA documents.

4) The commenter does not substantially state here, with regard to what information is lacking for site-specific analysis for the implementation actions being considered in the Draft NPRRAMP EA. The commenter does not provide which discipline or chapter is lacking in analysis or any reason as to why it is lacking. Furthermore, the full site-specific analysis of all implementation-level action alternatives was thorough and above and beyond what is expected and required of a BLM RAMP EA. The ID team thoroughly reviewed multiple BLM RAMP EAs with similar actions considered in developing the analysis for this EA and none of those documents contained the overall level of detailed analysis presented in the NPRRAMP Draft EA.

See the following examples:

The Trapper's Route RAMP EA (WY-060-EA06-107)

<http://www.blm.gov/wy/st/en/info/NEPA/documents/cfo/trappersroute.html>

Sixes River RAMP EA (OR128-99-13)

<http://www.blm.gov/or/districts/coosbay/plans/files/SixesRecPlanEA.pdf>

Hartman Rocks RAMP EA (DOI-BLM-CO-S060-2011-0004-EA)

[http://www.blm.gov/pgdata/etc/medialib/blm/co/information/nepa/gunnison\\_field\\_office.Par.85838.File.dat/Final%20Draft%20EA.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/co/information/nepa/gunnison_field_office.Par.85838.File.dat/Final%20Draft%20EA.pdf)

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cont...

**Public Review Comment Submitted to  
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5) 3. From the information provided in the proposed RAMP, it is apparent that the actions proposed under the preferred alternative have been under consideration for a very long time and that, during at least 18 years of inaction, the two primary objectives identified for management of the SRMA have not been met and at least 13 issues/concerns have been allowed to develop and deteriorate. I recommend the following two-part alternative decision:

- a. that the predominant, apparent management strategy of deferring site-specific management actions into the future be brought to an immediate end;
- b. that a decision be made in the proposed RAMP on each of the actions proposed under the preferred alternative and that each such decision be implemented under the authority of this RAMP.

**BLM RFO Response to Public Comment**

5) The BLM ID Team Cultural Specialist has communicated that the BLM does not currently have existing cultural surveys to provide site-specific analysis of the action alternatives for Key Action 1: Boat-in Campground and the action alternatives for Key Action 7: Big Creek.

In addition, the BLM ID Team Hydrology Specialist has communicated that the reroute proposed onto the revegetated two-track at Prospect Creek Rd. (see Key Action 6) has a wash-out where the existing two-track crosses a drainage. This reroute location was not proposed as an "opportunity for action" for the BLM to consider until a public meeting held in December of 2012. The previous BLM ID team on-site, conducted in the summer of 2012, was not able to include a visit to this wash-out due to the lack of identification of this reroute opportunity at that particular time.

As of Summer 2012 field season, the Boat-in Campground had been dismissed as an issue for future analysis by the BLM ID Team because of a low potential for frequent public use on the Lower North Platte and the priority of issues identified on the Upper North Platte. In the November 2012 Interested Agencies Meeting, at the request of several agency members with WGFD, the Boat-in Campground was reinstated as an "opportunity for action" to include for consideration in the NPRRAMP EA.

For Key Action 5, Corral Creek Campground, the BLM Hydrology Specialist also identified that there was a need for additional hydrology surveys for the proposed boat ramp considered in the Preferred Alternative. This specialist identified that potential hydrology and erosion issues from the meander of the North Platte River in the proposed boat ramp location would need further analysis to recommend feasibility and mitigations.

**Name of  
Draft Review  
Commenter**

Jim B. States,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

Please rethink the priorities established in the draft RAMP and develop a final plan that makes concrete decisions on implementation (or not) of all actions under the preferred alternative without delaying some decisions for an indefinite period to some future NEPA documents which are not actually needed under BLM NEPA guidelines. As a professional environmental scientist with over 35 years experience in evaluating the potential environmental impacts of proposed projects in the field, I can state with confidence that the information missing from the current RAMP analysis, such as a lack of soils, visual, and grazing information on an already existing Prospect Creek Road, does not rise to the level of potentially significant environmental impacts. In fact, failing to act soon to mitigate the already significant erosion problems associated with that road is what presents the greatest potential for significant impacts – to the environment and to human safety. In general, the deferral of decisions on Key Actions 1, 5, 6, and 7 as proposed in the draft RAMP for lack of information on soils, visual impacts, and grazing impacts etc. is unjustifiable and confounding in light of the stated objectives for this RAMP.

**BLM RFO Response to Public Comment**

Given the need for additional site-specific analysis stated above, it is necessary for the BLM ID team to conduct additional on-sites when weather and snow pack conditions allow during the current field season of 2013. In addition, the action alternatives for Key Actions 1, 5, 6, and 7 presented in the Draft NPRRAMP EA have been modified, in comparison to the original proposed development locations, through direct input provided in public and agency meetings as part of the NEPA planning process. The BLM has determined that the deferred tiering of Key Actions 1, 5, 6, and 7 is justifiable and in conformance with the BLM NEPA Handbook requirements (see pg. 27 section 5.2.2 Tiering) as well as BLM policy for involving ID Teams in project proposals.

The release of the NPRRAMP and EA is an immediate priority as per the State Director Interoffice Memorandum published in February, 2009. This IM stated that the NPRRAMP would be released in February of 2012 and would consider the moratorium. Any further delay of this NPRRAMP EA to allow for Key Actions 1, 5, 6, and 7 to be included with site-specific analysis within the current Draft would prevent the consideration of the moratorium before this year's fishing season on the North Platte. The BLM does not wish to further delay this document for that reason.

**Name of  
Draft Review  
Commenter**

Jim B. States,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

6) Specific Suggestion

It is under the above general concern that I offer the following additional observations and suggestions:

Under Section C, Purpose, the draft RAMP states that “to address the current RMP management objectives and actions for the SRMA as well as issues which emerged during scoping, management strategies proposed in this RAMP include the following:

- Provide high quality recreation opportunities, especially for floating, fishing, camping and sightseeing,
- Pursue access opportunities to the North Platte River.
- Manage commercial outfitting to disperse river usage
- Manage river parcels to meet Middle Country Setting guidelines and reclaim undesirable vehicle routes . . .”

The mix of immediate and deferred actions proposed in the draft RAMP is inconsistent with the above objectives in important ways. Because river usage, particularly at the Bennett Peak boat

**BLM RFO Response to Public Comment**

6) Each of these management strategies that the commenter lists as being presented in the NPRRAMP Draft EA are listed specifically in the 2008 Rawlins RMP (pg. 2-27). There has been no specific reference in the Draft NPRRAMP EA to exceedances of Middle Country Setting guidelines for Bennett Peak Campground. The proposed action alternatives at Bennett Peak are being considered to address conflicts/complaints with peak use parking and launching congestion rather than the average use as provided in the Middle Country classification. See the Recreation Setting Characteristics Matrix at this hyperlink: [http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information\\_Resources\\_Management/policy/im\\_attachments/2011.Par.42876.File.dat/IM2011-004\\_att5.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/im_attachments/2011.Par.42876.File.dat/IM2011-004_att5.pdf) This Draft has now been modified to include this matrix as an Appendix XVII (pgs. 79-81). The commenter does not substantively cite evidence or data to indicate that Middle Country Setting Guidelines are exceeded at Bennett Peak Campground. No exceedances of Middle Country will be referenced in the Final NPRRAMP and EA including Bennett Peak Campground. For the Preferred Alternative for Key Action 3, 22 craft encounters are referenced as a Middle Country limit. The Draft does not state a reference to 22 SRPs being given immediate approval. In fact the Preferred Alternative states that monitoring data would provide indicators for whether SRMA objectives are not being met. Under this alternative, the potential release schedule of SRPs from the waiting list could be adjusted if SRMA objectives are not being met (these objectives also include Middle Country standards). Furthermore, based on recent public comments for this draft, the field manager has now asked that the Preferred Alternative now state "up to 6" releases of SRP permits every other year in order to be more responsive to future monitoring data and SRMA objectives. River congestion immediately downstream of the Bennett Peak boat ramp has not been identified as an issue by the public, agencies, outfitters, or the BLM. The peak-use congestion issue concerns parking overflow impeding traffic and launch waiting times.

**Name of  
Draft Review  
Commenter**

Jim B. States,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

launch, is and has been for years in excess of Middle Country Setting guidelines, proposed immediate granting of 22 Special Recreation Permits (SRP) prior to taking actions to disperse river use is premature, particularly in the absence of any estimation of how many boats per day this would add to the river on peak use days. The moratorium on additional SRPs should be continued until those actions which would do the most to disperse river use – improving Prospect Creek Road erosion improvements (thereby improving boating access at the river on river’s west side) and providing road and launch improvements at Big Creek – have been taken first. In the present plan, these latter two actions have been indefinitely postponed and the proposed increase in permits just exacerbates the problem. Even widening the boat ramp and providing additional parking at Bennett Peak Campground does nothing to “disperse” river use; it simply allows for more congestion emanating from a single launch point on the river. The above two deferred actions are the very actions which should be taken first, so as to alleviate the congestion that has led to exceeding the Middle Country Setting guidelines in the first place.

**BLM RFO Response to Public Comment**

No exceedances of Middle Country have been reported for Bennett Peak Campground. No issues with visitor use congestion have been reported to the BLM for surface water use at Bennett Peak.

**Name of  
Draft Review  
Commenter**

Jim B. States,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

7) Please rethink the priorities established in the draft RAMP and develop a final plan that makes concrete decisions on implementation (or not) of all actions under the preferred alternative without delaying some decisions for an indefinite period to some future NEPA documents which are not actually needed under BLM NEPA guidelines.

**BLM RFO Response to Public Comment**

7) Please refer to earlier responses to your comments concerning the BLM's requirements to conduct on-sites for the purpose of site-specific analysis for Key Actions, 1, 5, 6, and 7.

**Name of  
Draft Review  
Commenter**

Dave Gloss

**Public Review Comment Submitted to  
Rawlins Field Office**

Please accept the following comments on the North Platte River Recreation Area Management Plan (RAMP) and Environmental Assessment (EA) (DOI-BLM-WY-030-2013-0094-EA).

First, thank you for working to update the RAMP and review conditions and management of the North Platte River. I am a private boater and occasional fisherman who has enjoyed the North Platte River over the past 20 years.

1) Key Action #1: Camping for boaters in this section of river is very limited, so I support the idea of developing a boat-in campsite with toilet facilities.

2) Key Action #2: I support the preferred alternative.

3) Key Action #3: I support the preferred alternative, as long as monitoring and implementation can effectively ensure Middle Country limits are not exceeded.

4) Key Action #4: I support the preferred alternative as I occasionally have experienced short waiting time and congestion at the existing boat ramp. Expansion is a simple, cost-effective way to reduce the wait time and congestion. Providing some additional designated parking would also help reduce the occasional parking congestion.

**BLM RFO Response to Public Comment**

1) The BLM acknowledges your support for the Preferred Alternative presented in Key Action #1.

2) The BLM acknowledges your support for the Preferred Alternative presented in Key Action #2.

3) The BLM acknowledges your support for the Preferred Alternative presented in Key Action #3 and will monitor changes in visitor use and resource conditions closely to determine any future exceedances of Middle Country and conformance to other SRMA goals and objectives.

4) The BLM acknowledges your support for the Preferred Alternative presented in Key Action #4. The BLM has added the opportunity of boat tie-offs (u-bolts placed in several large native rocks) to the Preferred Alternative and this will include anchors below campsites and the ramp. There is currently no rule against walking from the river to campsites within Bennett Peak Campground so anchoring a boat and walking to the campsite with equipment would be considered within the Preferred Alternative.

**Name of  
Draft Review  
Commenter**

Dave Gloss,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

As a concurrent or future action at Bennett Peak Campground, please consider providing boat-in campsites. There are limited campsites for overnight boaters in this section of river. We have occasionally boated to Bennett Peak Campground, camped there and then continued boating the next day. Access to campsites from boats is currently problematic due to the limited sites for boat pull-offs and thick riparian vegetation between the river and the existing campsites. Opportunities include providing boat tie-offs and trails from the river to a few of the existing campsites upstream of the boat ramp or looking for opportunities to develop a few new boat-in only campsites (perhaps downstream of the boat ramp).

5) Key Action #6: I support the Preferred Alternative. Please also include reclamation and restoration of any re-routed sections of road to prevent motorized access on the routes being abandoned and also reclamation to address existing resource concerns. Suggestions include dealing with the drainage of the abandoned sections of road, ripping to reduce compaction, seeding to encourage revegetation and signing or otherwise providing barriers to prevent motorized use.

**BLM RFO Response to Public Comment**

5) The BLM acknowledges the commenter's support for the Preferred Alternative presented in Key Action #6. The BLM will include any abandoned road/two-track sections from potential re-routes in the forthcoming site-specific reclamation plan.

**Name of  
Draft Review  
Commenter**

Dave Gloss,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

6) Key Action #7: I support the no action alternative/existing condition. We often use this section of public land for dispersed camping along this section of river. It is one of the few spots to camp in this section of river. The solitude at the site, since it is not currently very accessible by motorized vehicles, is one of the best attributes of the site that would be significantly changed by all the action alternatives. If additional access points are deemed necessary, I support that development at Corral Creek over Big Creek. Key Action #7 Preferred Alternative: The cost and environmental effects of constructing a crossing of French Creek, which would be passable during high flows when most desirable for access (i.e. a bridge or culvert vs. a ford), are not worth the benefit for the limited use it would probably receive. If a road crossing is put over French Creek, please ensure it is designed and implemented to allow up and downstream passage of aquatic organisms, primarily fish, as disconnecting French Creek from the North Platte River would have a major habitat fragmentation effect on the fisheries. If access and boat launch are developed, a toilet should be installed to handle human waste.

**BLM RFO Response to Public Comment**

6) The BLM acknowledges the commenter's support for the No Action Alternative/Existing Condition presented in Key Action #7. The opportunities presented in the Preferred Alternative for Key Action #7 have received support from a preponderance of input during public meetings in December 2012 and April 2013, the outfitters meeting in January of 2013, and an Interested Agencies Meeting in November of 2012. The proposed improvements at Big Creek Undeveloped Recreation Site would not exclude the opportunity for dispersed camping at Big Creek and to attain some level of privacy away from the proposed boat launch area. However, being designated as a Middle Country Recreation Setting, Big Creek is not currently managed for solitude. The No Action alternative, should it be selected, would be inclusive of your comment concerning the existing conditions which you state provide solitude and will certainly be given full consideration. In the future site-specific analysis, the BLM will consider the opportunity of providing boat tie-offs and social trails to enhance access for boat-in camping upstream from the proposed boat ramp at Big Creek. This would potentially provide an area for boat-in camping away from the road and mainstream traffic. The BLM has modified the action alternatives for Big Creek to include the replacement of the existing pit toilet with a modern toilet that would adequately dispose of the level of human waste produced by increased use. As for the comment concerning the crossing of French Creek within the Preferred Alternative, during the site-specific analysis and development of the tiered NEPA document for Big Creek, the ID team will closely consider your comment and provide analysis of an alternative to specifically include downstream passage of aquatic organisms and other necessary mitigations.

**Name of  
Draft Review  
Commenter**

Dave Gloss,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

7) Key Action #7 Alternative 1: The cost and feasibility of improving the 211 road are not worth the benefit for the limited use it would probably receive. In addition, it seems the amount of time it would take to get to the river, even if the road were improved to some degree, would limit the use on this route (why drive here, when you could get to Bennett or Corral quicker on a better road?).

**BLM RFO Response to Public Comment**

7) The BLM acknowledges the commenter's lack of support for Alternative 1 in Key Action #7.

**Name of  
Draft Review  
Commenter**

Mitch Bangert  
Harrison's  
Guest House &  
Guide Service

**Public Review Comment Submitted to  
Rawlins Field Office**

1) I hope you have a productive meeting this evening. After reading the draft I am in hopes the BLM won't do anything without even more investigation and talks. You've done a very thorough job but once you take on any of the proposed projects or add more permit holders you won't ever be able to take them back. Please consider what makes the upper North Platte Valley so special ... it's not over crowded. It's not overcrowded because it's a pain to access. The fishing remains good to excellent, because it's not overcrowded. The experience remains for the most part wild and lonesome because it's not overcrowded.... with a few holiday weekend exceptions. Everything that makes this area special would change by making access easy ... more roads in, more room at the Bennett put in /take out for parking and more lanes at the boat ramp. More and easier access at Corral Creek. Chris, there are so many areas in and around the upper Platte where access is easy, where the public and outfitters can enjoy great fishing and a great experience ..... the area from the CO border to Treasure Island is just that little bit more special ... you wouldn't be denying anything to anyone by leaving it alone to the folks who don't mind working a little harder for their recreation.

**BLM RFO Response to Public Comment**

1) As stated in the NPRRAMP and Draft EA, 4 public meetings, 2 outfitters meetings, and one agencies meeting were held for the development and review of the NPRRAMP. This number of meetings exceeds the required level of public involvement for a NEPA process or standards of the BLM for an EA. Furthermore, the draft provides results of previous monitoring data which includes empirical evidence to support the development of alternatives in the draft which is above and beyond what is required of an EA. Typically, only EIS documents include this type of information. With that said, the Rawlins Field Office is in support of future monitoring to determine resource conditions and the level to which the SRMA is meeting the objectives stated in the 2008 Rawlins RMP. A summer seasonal has already been hired to conduct monitoring on the river. The BLM plans to conduct additional monitoring of social and physical resource conditions during the summer of 2013 and in future seasons. Previous BLM monitoring data indicates that, overall, the North Platte River is, on the average, not exceeding Middle Country standards, and that there are some parking and launch congestion issues during peak use weekends, particularly at Bennett Peak Campground boat launch. Monitoring data also indicates, from the CO border to Corral Creek Campground, that use levels are currently consistent with a Primitive Recreation setting. With that said, the North Platte River SRMA is currently designated as a Middle Country Recreation setting and this designation allows for a higher level of visitor use within the SRMA than the current use. The Recreation setting classification for the planning area could change to either Front Country or Back Country under Alternative #1 and #2 in Key Action 3. Therefore, the substance of this comment is considered in the range of alternatives and will be given full consideration. With potential use dispersal, there could likely be less river congestion from Bennett Peak to Treasure Island which is currently the primary river section of concern.

**Name of  
Draft Review  
Commenter**  
Mitch Bangert  
Harrison's  
Guest House &  
Guide Service,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

Please consider the examples of special places lost in my previous correspondence to you..... and do our best to keep one of the best Western, Rocky Mountain, experiences alive and well. I hope to be available for future meetings and brain storming.

2) Once again I'm disappointed I won't be able to make the meeting .... will be flying out of town to a trade show.  
Please do me a favor and send again the results and recommendations for the BLM areas of the upper Platte ..... My computer is eating things and throwing them in the Internet void.  
I want to make copies of the suggestions and give all your folks research the time it deserves.  
I hope my letter makes clear my stand on improvements, etc .... I just scanned the different proposals before my computer lost your info ... but geese was one of the recommendations that only seeing 22 boats a day is and OK amount?? I thought the six boats was perfect ... but again I need to spend some time with your data so please resend when you can.

**BLM RFO Response to Public Comment**

Currently, when considered overall, monitoring data throughout the planning area indicate very minimal issues on the river with regard to crowding and social conflicts. Because of proximity and lack of convenience and the need for a high-clearance 4WD under all alternatives, it is expected that the section from Prospect to Big Creek would still receive lower use on days when peak use weekends receive higher use on other sections of the river. Thus, the commenter's desired opportunity to experience solitude and less crowding would likely remain available.

2) A link and press release for the NPRRAMP and EA was sent out to the commenter.  
Within the preferred alternative, the proposed Middle Country limit of 22 craft encounters per day is based on an average. For the purpose of assessing this limit in future monitoring data, visitor use would be computed from peak and non-peak use weekends and weekdays. Based on the current usage data, it is very unlikely that this number would be reached in the near future when computing this average. Past monitoring data indicates that the planning area visitor use is consistent with a Back Country Setting rather than the designated Middle Country Setting (i.e., 8 boats encountered during one day of monitoring for Middle Country conditions).  
Upstream of Prospect Creek, the Forest Service offers a semi-primitive section of river which still has world class trout fishing and available river access. Therefore, beyond the current primitive to backcountry conditions currently available at Prospect Creek, the opportunity for the public to experience solitude in an area with semi-primitive conditions would remain as an available nearby option on the national forest managed sections of the North Platte River.

**Name of  
Draft Review  
Commenter**

Mitch Bangert  
Harrison's  
Guest House &  
Guide Service,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

3) A trip this last weekend to ski in Aspen has reminded me why it is so important to protect the North Platte River and the Valley that it sits in.

I've strenuously objected to opening up the boat ramp at Bennett Peak and to any changes to access on the upper North Platte ..... my trip this last weekend has reminded me why.

In the late 70s and early 80s when I first came to the West, I lived in Colorado and spent as much time as I could fishing, bow hunting, camping etc in two areas .... The Piney Lakes and Creek area, next to Eagles Nest Wilderness, about 15 miles North of Middle Vail. This area provided some of the finest small creek and lake fishing with a ton of elk, deer, grouse and bear in the area. The Roaring Fork Valley from Aspen to Glenwood Springs, CO. The Roaring Fork and Frying Pan offered some of the best tail water and freestone fishing and experiences the Rocky Mountain West had to offer. Getting to Eagles Nest Wilderness was a tough go ... really bad road, four wheel drive only, and even then when it got snow or rain it became almost impassable because of the clay. I left to guide in Alaska in 90 and 91 so I hadn't been in the Piney Lakes area for a couple of years.

**BLM RFO Response to Public Comment**

3) Same Response with regard to crowding and opportunities for primitive conditions as for the above comment. The North Platte SRMA contains no sections of public land designated as wilderness or wilderness study areas. Most of the SRMA lies within a checkerboard pattern of land ownership.

**Name of  
Draft Review  
Commenter**

Mitch Bangert  
Harrison's  
Guest House &  
Guide Service,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

So the summer of 92 I took off for a long weekend to my old stomping grounds .... First the shape of the road was in really good shape and about a 1/3 of the way back in a Jaguar passed me going back down the hill!! A freakin Jaguar! Then other passenger cars passed me heading towards Vail. As it turns out Vail Associates had purchased the old Piney Ranch and had turned it into an easy accessible year round resort. Hunting Outfitters, snowmobiles, etc .... Due to the ease of getting there now it turned the Valley into a circus ... fishing and hunting degraded and certainly the wilderness experience degraded. A special place that no longer exists.

4) A drive down the Roaring Fork Valley to Aspen in the 80s was a journey... the Glenwood Canyon was a skinney two lane and it was a two lane all the way from Glenwood to Aspen ... it took a while! It's now solid McMansions from Glenwood to Aspen, the traffic is akin to traffic in the front range Denver, flying along on four lanes all the way up the valley .... I have no Idea how they expect there to be enough water to handle all of the use .... And leave some for the rivers, wildlife and habitat that depends on it.

**BLM RFO Response to Public Comment**

4) No decisions have yet been made to widen or add any boat ramps. The comment concerning a lack of support for any proposed boat ramps will be given full consideration as support for the No Action/Existing Conditions Alternatives in Key Actions 4, 5, and 7 (Bennett Peak, Corral Creek, and Big Creek).

**Name of  
Draft Review  
Commenter**

Mitch Bangert  
Harrison's  
Guest House &  
Guide Service,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

They have pollution in the Valley now on inversion days and even during the week we had a hard time finding a bit of real estate to snowshoe on that wasn't occupied with scads of other folks. Still one of the most beautiful places on the planet but the experience was all but a shadow of what I enjoyed in the 80s and early ninties.

By fair comparison to Vail and Aspen of the 70s/80s.. the boat ramp at Bennett is only one lane, the road is long and a bit rough getting there which in turn naturally keeps the crowds down, enhancing the fishery and the experience. Similar to the Prospect Access point on the upper Platte.... It's hard and gets relatively little use. It seems by widening the boat ramp, and adding boat ramps would allow visitors at an unsustainable level to now access the river.

I think there are enough places that allow easy access for folks to catch a fish, take a boat ride, that you DON't have to take the special places and make them ordinary.

**BLM RFO Response to Public Comment**

Same as Response #4.

<b>Name of Draft Review Commenter</b>	<b>Public Review Comment Submitted to Rawlins Field Office</b>	<b>BLM RFO Response to Public Comment</b>
Mitch Bangert Harrison's Guest House & Guide Service, cont...	<p>You have the data, at least from the past 3 – 4 years .... It seems to me that the upper Platte has a sustainable amount of use now ... can it or should it handle more ????</p> <p>I'm telling you the comparison is more than fair, the Piney Lakes and Eagle Nest Wilderness areas, The Roaring Fork Valley and the Upper Platte River .... Can we afford to lose any more special places than we already have???</p>	Same as Response #4.
	<p>I think the word all the governing bodies that look after our BLM and National Forest lands need to keep near and dear to them is sustainable. Your organizations are charged with getting the greatest amount of use from these public places while maintaining their native and natural integrity ... this is not an easy job ... but I would propose it is always better to err on the side of caution with these special places and not institute policys, access or changes that down the road you can't take back.</p>	
	<p>I've talked mostly about the experience that would suffer from ease of access and the more people and the use that would come from it. The wild Western experience that thousands of people travel thousands of miles to enjoy</p>	

<b>Name of Draft Review Commenter</b>	<b>Public Review Comment Submitted to Rawlins Field Office</b>	<b>BLM RFO Response to Public Comment</b>
Mitch Bangert Harrison's Guest House & Guide Service, cont...	<p>certainly suffers ( not to mention the locals loss of that experience in their back yards!).... but the fishery would also suffer.</p> <p>I've been fishing the North Platte River since 82. The fishery then was vibrant and well.... easy. The majority of folks who used the river wanted a nice day and a nice meal of trout that night ... this was long before catch and release or fly fishing were the norm.... and the crowds of people who took up the sport that came with it.... It was a happy and for the most part, void of crowds river. These days the fishing can still be easy .... And the river is still vibrant with a great bio mass of bugs and other foods and a great population of healthy fish.... But the fishing HAS changed .... It's still a great fishery but you have to be just that much better of a fisher person to have great days. A comparison would be the Henrys Fork Railroad Section or the South Platte River ... both rivers now need a deft touch by very good fisher folks ... and even then it's a tough go most days for most folks.... And your enjoying this tough fishing with hundreds of your other fishing buddies. Once again it comes down to what level of people and use is sustainable to maintain some of the innocence the North Platte River Valley still enjoys. I don't have all the answers but I can certainly talk from experience about areas that have suffered mightly</p>	Same as Response #4.

**Name of  
Draft Review  
Commenter**

Mitch Bangert  
Harrison's  
Guest House &  
Guide Service,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

from overuse and abuse. If we don't learn from history we are bound to repeat it ... please let us learn from other missteps we've made in other areas of the Rocky Mountain West and know that The North Platte Valley, the Encampment Valley and all of their attendant tributaries and watersheds are finite, fragile and rare resources we are dealing with.

I know you folks are doing the best you can and that you also care, just needed to give you another viewpoint to chew on! A viewpoint by the way contributed to you by a native New Yorker who moved to Colorado/Wyoming that has in his own way contributed to these problems ... right ??? I'm an outfitter making money on the resource as well as an person who enjoys the resource ... how do I justify my part in lessening the experience for others ???

**BLM RFO Response to Public Comment**

Same as Response #4.

**Name of  
Draft Review  
Commenter**

Mitch Bangert  
Harrison's  
Guest House &  
Guide Service,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

2) Mitch: Disagree for the same reasons above ... the upper Platte get's enough pressure just like it is. Believe me go to the North Fork of the Salmon, Go to the Madison, go to the Green ... lot's of easy access and way too much pressure, not a great experience.... I've fished them all with the crowds ... it's more akin to combat fishing then what people travel thousands of miles to experience.

Potential improvements to Big Creek Confluence access were discussed. Outfitters were much more supportive of an opportunity to enter BLM sections north of French Creek. This potential route was discussed as involving the creation of a new bridge and two-track over French Creek to access a new boat launch at the confluence. Preliminary cost estimates were discussed  
Mitch: this makes more sense from a spacing of take outs/ put ins ... just don't make it a freeway ... make people earn their use of the Platte. Please no multi trailer boat ramps on the upper north platte.

**BLM RFO Response to Public Comment**

2) Same response with regard to crowding and opportunities for primitive conditions as for the above comment and response concerning primitive opportunities at Prospect Creek.

The BLM acknowledges the commenter's support for the proposed actions to improve river access at Big Creek Undeveloped Recreation Site and will consider this comment in the selection of alternatives (while also considering comment concerning primitive road conditions).

**Name of  
Draft Review  
Commenter**

Mitch Bangert  
Harrison's  
Guest House &  
Guide Service,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

Sturm and Faust stated that Brush Creek Ranch deserves a new permit because they are a legitimate outfit. They asked whether there was a waiting list. Chris Jones stated that he asked Dave Hullum, Outdoor Rec Planner in Rawlins, for the list and that Dave said that he had not seen a list. Chris Jones said that he would look further into whether a list existed.

**BLM RFO Response to Public Comment**

**Name of  
Draft Review  
Commenter**

Mitch Bangert  
Harrison's  
Guest House &  
Guide Service,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

3) Mitch: Brush Creek deserves a permit because they are legitimate ... really?? Listen this happened before with my permit. I had a permit before another outfit, they were bigger so they got weekends and I did not, I complained to Noel and she rectified the situation. To my knowledge mine was the last BLM permit allowed, the BLM is now just done with our three year trial run of giving all BLM permit holders unlimited days ... I have yet to hear from the BLM, to see if in your reports, if the North platte river outfitter use was at a sustainable level or not?? Though three years is hardly a useful sampling of outfitter use ... two flood years and one drought year, there is no way that Brush Creek " Deserves a Permit " Lot's of legitimate guides out there who have had their name on the " list for years " Last I talked to Noel it was about 30 requests deep. They shouldn't be allowed to jump the list. And Noel showed me the list and yes it at least did exist then... just ask Ray Bredehoft who's been waiting for years.

**BLM RFO Response to Public Comment**

3) A float fishing SRP waiting list was located and is now up to date with contacts made or attempts to contact all on the list. If the moratorium is lifted with decisions in the NPRRAMP EA, applicants would be reviewed according to the BLM SRP Handbook and in order of the waiting list.

<b>Name of Draft Review Commenter</b>	<b>Public Review Comment Submitted to Rawlins Field Office</b>	<b>BLM RFO Response to Public Comment</b>
Wyoming Game and Fish Department	<p>1) The staff of the Wyoming Game and Fish Department has reviewed the Environmental Assessment for the North Platte River Recreation Area Management Plan. We offer the following comments for your consideration. Terrestrial Considerations: We have no terrestrial wildlife concerns pertaining to this proposed management plan.</p> <p>Aquatic Considerations: In general, we support the main objectives of the BLM's North Platte River Recreation Area Management Plan, specifically to include under Purpose on pages 4-5 the first two bullet items:</p> <p>"Provide high quality recreation opportunities, especially for floating, fishing, camping and sightseeing" and "Pursue access opportunities to the North Platte River." We would point out that the plan refers to the 100 plus miles of the North Platte River. While BLM certainly has site specific ownership areas like Bennett Peak, the majority of river miles is in private ownership (55%) and BLM has approximately 10% ownership that the river reach mentioned in the plan passes through.</p>	<p>1) The BLM has changed the ownership language on page 1 to reflect the approximation of 55% private and 10% BLM ownership of sections along the North Platte River within the planning area.</p>

Name of Draft Review Commenter	Public Review Comment Submitted to Rawlins Field Office	BLM RFO Response to Public Comment
Wyoming Game and Fish Department, cont...	<p>Plan specific comments referenced by page number:</p> <p>2) (6-7) A count of visitors at the Dugway Campground in 2010 references an exceedance of Middle Country limits over a three hour period on June 6. Visitors were passing by on County Road 351 and were not stopping to visit the SRMA. If visitors were not stopping in the campground how can limits be exceeded? "Nine visitors within boats were encountered over a two hour period at another location. We can't tell from Table 4 how many boats that actually is? Regardless, that doesn't seem to be excessive use from the Department's perspective.</p>	<p>2) The BLM has modified the former recreation planner's determinations of two exceedances of Middle Country guidelines reported in Table 4. The Draft NPRRAMP EA is now modified to state that there were no exceedances of Middle Country standards on either occasion. Robin Feulah, BLM Idaho State Lead has directed the Sounding Board to interpret the Middle Country guidelines of 15-29 craft encountered per day on travel routes (i.e., river) to reflect an average of peak and non-peak use over a season and not the literal exceedance on a single peak-use day. See the guidelines in the following Recreation Settings Characteristics Matrix: <a href="http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/im_attachments/2011.Par.42876.File.dat/IM2011-004_att5.pdf">http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/im_attachments/2011.Par.42876.File.dat/IM2011-004_att5.pdf</a> Within the matrix, in the green column for Contacts, the guidelines state "Average with any other group." Robin Feulah has also provided the Sounding Board guidance as to encounters stating that encounters on travel routes is interpreted as encounters with other craft on the river. This interpretation further suggests that there were no exceedances of Middle Country standards on the North Platte River SRMA during 2010.</p> <p>The above interpretation is in contrast to what the former recreation planner's Recreation Opportunity Spectrum forms had indicated where several exceedances were recorded through misinterpretation of the Middle Country limits by that planner. The former recreation planner appears to have not used a daily average to determine exceedances from the data reported in Table 4. The current NPRRAMP Draft EA should not have included these misinterpretations as "exceedances" and the Draft has been corrected to exclude any exceedances.</p>

**Name of  
Draft Review  
Commenter**

Wyoming Game  
and Fish  
Department,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

3) (7) Survey results of visitors don't seem to support earlier statements of excessive use.

4) (14-18) Preferred Alternative and Key Actions- specific comments: We conditionally support Key Actions 1,2,4,5,6, and 7. We have no comment on Key Action 3 dealing with commercial permitting.

5) Key Action 1 - We strongly support development of the proposed boat-in campground at the location given in the plan.

**BLM RFO Response to Public Comment**

3) The Draft NPRRAMP and EA does not conclude that there was overall excessive use on the river. Issues were identified through public input, public complaints, and traffic counter data that peak use was causing a conflict at the Bennett Peak Campground boat launch and parking area. As indicated on pages 8 and 9 of the draft there were 104 visitors arriving to Bennett Peak Campground between the hours of 7 a.m. and 8 a.m. on June 6, 2012. Therefore, it appears that this congestion issue at the boat ramp continues even during drought years such as 2012 when visitor use has typically been lower.

4) The BLM acknowledges WGFD's conditional support for Key Actions 1, 2, 4, 5, 6, and 7 and provision of no comment for Key Action 3.

5) The BLM acknowledges WGFD's strong support for Key Action 1 and will consider this input in the selection of alternatives.

<b>Name of Draft Review Commenter</b>	<b>Public Review Comment Submitted to Rawlins Field Office</b>	<b>BLM RFO Response to Public Comment</b>
Wyoming Game and Fish Department, cont...	6) Key Action 2 - We strongly support the Leave No Trace education effort. In addition, we recommend signage at the Bennett Peak boat launch informing the public how far it is downstream to the next public restroom facilities (Treasure Island). This may help reduce the human waste issues mentioned in the plan.	6) The BLM acknowledges WGFD's strong support for Key Action 2 and will consider this support in the selection of alternatives. The Preferred Alternatives for Key Action 4 has been modified to now include the provision of a map within the proposed educational kiosk. This map would display a legend for the location of public restroom facilities and launches downstream of Bennett Peak.

<b>Name of Draft Review Commenter</b>	<b>Public Review Comment Submitted to Rawlins Field Office</b>	<b>BLM RFO Response to Public Comment</b>
Wyoming Game and Fish Department, cont...	7) Key Action 4 - Additional parking lot and boat ramp at Bennett Peak Campground - We conditionally support this effort. Improved boat launching and parking may significantly increase river use.	7) The BLM acknowledges WGFD's conditional support for Key Action 4 and will consider this support in the selection of alternatives. The BLM, as stated in the draft, will closely monitor any changes in visitor use on the river. The BLM will coordinate with WGFD in these efforts and provide any requested monitoring data to their agency.
	8) Key Action 5 - Improvement of Corral Creek Campground - We conditionally support this effort as it may help reduce congestion at the Bennett Peak Campground. We are not sure that two more campsites will accommodate the potential increase in use. Again, better access and parking may significantly increase river use.	8) The BLM acknowledges WGFD's conditional support for Key Action 4 and will consider this support in the selection of alternatives. The BLM recognizes that any improvements of Corral Creek Campground river access and parking would likely lead to increased site visitation. The BLM will consider the addition of several more campsites in the site-specific analysis and tiered NEPA document for Corral Creek.
	9) Key Action 6 - Improvement of Prospect Creek undeveloped recreation site - We support this effort. An improved public access site for boat launching is very much needed on the west side of the river between Treasure Island and Sixmile Gap.	9) The BLM acknowledges WGFD's support for Key Action 6 and will consider this support in the selection of alternatives.

**Name of  
Draft Review  
Commenter**

Wyoming Game  
and Fish  
Department,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

10) Key Action 7 - Improvement of Big Creek undeveloped recreation site - We conditionally support this effort. This location is perhaps better suited to a boat-in type campground due to the distance and condition of the access road. Efforts could probably be better spent on the Prospect Creek recreation site.

11) (41) Invasive Species - Anglers are the targeted group in this discussion. While they are a component of the Aquatic Invasive Species (AIS) issue, boaters in general (recreation boating users of any type) are also a major component.

**BLM RFO Response to Public Comment**

10) The BLM acknowledges WGFD's conditional support for Key Action 7 and will consider this support in the selection of alternatives. The access road proposed in the Preferred Alternative for Big Creek would provide visitors and outfitters based out of Saratoga, WY the ability to access the site as quickly and conveniently as Corral Creek and Bennett Peak. Currently, public comments suggest that Big Creek is already utilized as a Boat-in Campground in its current designation as an Undeveloped Recreation Site. In the forthcoming site-specific analysis, the BLM will consider the opportunity for action of a boat-in campground. As for Prospect Creek, the public, outfitters, and agencies meetings have not provided issues or input towards the development of a campground at Prospect Creek other than to suggest a single tent site at this location. Based on recent public comments, the BLM has chosen to exclude any campsites from the action alternatives for Prospect Creek. However, the decision to exclude campsites could be modified after site-specific analysis and tiered NEPA documents are considered for Prospect Creek.

11) The use of the word "anglers" in the Invasive Species subsection on page 41 of the draft has now been changed to "boaters."

<b>Name of Draft Review Commenter</b>	<b>Public Review Comment Submitted to Rawlins Field Office</b>	<b>BLM RFO Response to Public Comment</b>
Wyoming Game and Fish Department, cont...	<p>12) Specifically, preventing the spread of aquatic invasive species (AIS) is a priority for the State of Wyoming, and in many cases, the intentional or unintentional spread of organisms from one body of water to another would be considered a violation of State statute and Wyoming Game and Fish Commission Regulation. To prevent the spread of AIS, the following is required: If equipment has been used in a high risk infested water [a water known to contain Dreissenid mussels* (zebra/quagga mussels)], the equipment must be inspected by an authorized aquatic invasive species inspector recognized by the state of Wyoming prior to its use in any Wyoming water. Any equipment entering the State by land from March through November (regardless of where it was last used), must be inspected by an authorized aquatic invasive species inspector prior to its use in any Wyoming waters. If aquatic invasive species are found, the equipment will need to be decontaminated by an authorized aquatic invasive species inspector.</p>	<p>12) If the Preferred Alternative at Bennett Peak Campground is selected, the BLM will coordinate with WGFD to provide a posting of these regulations within the proposed educational kiosk. The Preferred Alternative in Key Action 4 now includes the posting of rules on the proposed kiosk.</p>

<b>Name of Draft Review Commenter</b>	<b>Public Review Comment Submitted to Rawlins Field Office</b>	<b>BLM RFO Response to Public Comment</b>
Wyoming Game and Fish Department, cont...	Any time equipment is moved from one 4111 level (8-digit) Hydrological Unit Code watershed to another within Wyoming, the following guidelines are recommended: DRAIN: Drain all water from watercraft, gear, equipment, and tanks. Leave wet compartments open to dry. CLEAN: Clean all plants, mud, and debris from vehicle, tanks, watercraft, and equipment. DRY: Dry everything thoroughly. In Wyoming, we recommend drying for 5 days in Summer (June - August); 18 days in Spring (March- May) and Fall (September -November); or 3 days in Winter (December- February) when temperatures are at or below freezing. *A list of high risk infested waters and locations in Wyoming to obtain an AIS inspection can be found at: <a href="http://wgfd.wyo.gov">wgfd.wyo.gov</a>	Same as Response #12

**Name of  
Draft Review  
Commenter**

Phil McGrath,  
Brush Creek  
Ranch

**Public Review Comment Submitted to  
Rawlins Field Office**

1) If this plan is approved BCR is on the list to receive a permit. My understanding of is we are number 13 on the waiting list. BCR would like to suggest that the selection process for new permitted outfitters be considered in great detail. We would also request that the current use of permit holders be closely examined. Being involved in this process would greatly help BCR understand the future of its fishing business. When we speak next week hopefully we can discuss this in more detail. It seems to make sense that priority be given to business that have the most logical need and can provide the most and best service to the public. BCR is financially stable, highly professional and committed to persevering and enhancing the resources of the Upper North Platte River Valley.

**BLM RFO Response to Public Comment**

1) Brush Creek Ranch is currently on the waiting list to be considered for an SRP for float fishing guiding/outfitting. The BLM SRP Handbook (2930-1) provides no guidance as to preference or priority for businesses who "have the most logical need" or who can provide the "best service to the public." The SRP Handbook (pg. 21), states that the issuance of an SRP includes the following:

1. Submitted a signed operating plan;
2. Provided a copy of an appropriate insurance policy for new permits or a valid certificate of insurance; (See Paragraph N. Insurance and Liability section.)
3. Financial capacity to complete and maintain the proposed project or carry out the activity;
4. Complied with terms or stipulations of previous permits issued by the BLM or other land managing agencies or State agencies for similar activities;
5. Paid estimated fees in advance;
6. Obtained necessary Federal, State, or local licenses;
7. Obtained bonds or cash deposit, if required; and (See Paragraph M. Bonds)
8. Submitted other information required by the authorized officer in advance of issuing the permit. This may include a list of names, i.e., employees or others, authorized to do business on behalf of the applicant and any limitations upon their authority.

If the moratorium is lifted through selection of the action alternatives in Key Action 3, the BLM would follow the above requirements in considering the issuance of float fishing SRPs applicants on the waiting list which does include under item 3, the "financial capacity" to carry out the activity.

**Name of  
Draft Review  
Commenter**

Phil McGrath,  
Brush Creek  
Ranch, cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

2) As a professional I can see some benefits to the Big Creek Access. It would provide a shorter float that would be conducive for guests. Prospect Creek to Big Creek is a great float. The road is a challenge. I am no engineer but I can see the road still being a challenge once a new road is built because of snow and mud during the time of year that river levels are best for floating on the upper river. On a more personal note, the short season fishing season and the water directly down stream know as "Millie's Riffle" make this access difficult and potentially hazardous to boaters and land owners down stream. The Upper North Platte has a wonderful Wilderness feel, not only because of the designated wilderness area but because of long stretches and difficult access. I believe that improving the Big Creek Access would take away from the remoteness of this water. The proposed ideas for Bennett Peak make a lot of sense. They seem like logical solutions to fix the minor vehicle traffic problems. Also the proposed re-opening of the ramp at corral creek seems to have a lot of benefits as far as dispersing river traffic.

**BLM RFO Response to Public Comment**

2) Under the Preferred Alternative for Prospect Creek Recreation Site, development would be limited those consistent with backcountry to primitive conditions with road access still requiring a high-clearance 4wd vehicle and no additional facilities other than less erosive primitive two-track conditions, a slightly larger primitive parking area, and widened turnaround. The BLM has also decided to remove the one tent site from the Preferred Alternative for Prospect Creek within the Final NPRRAMP EA. With the remoteness of Prospect Creek Recreation Site and the difficulty in accessing this site, it is unlikely to become a crowded boat launch area and opportunities for more primitive and backcountry conditions are likely to continue for the river section between Prospect and Big Creek. The NPRRAMP ID Team will fully consider the input and opportunities discussed in this comment when conducting site-specific analyses for Big Creek and Prospect Creek.

**Name of  
Draft Review  
Commenter**

Phil McGrath,  
Brush Creek  
Ranch, cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

3) As a non commercial angler I fish often north of Saratoga. Downstream of Old Frasier is one of my favorite stretches of river. I float and camp there as often as possible. This area is truly pristine and offers as remote of trout fishing as almost anywhere in the Rockies. I almost never see any one else fishing or floating. I camped for at least 6 nights there last year and saw no negative signs of campers. There are ample areas to camp and a small fire ring or two is all I have ever seen. I do not see the need for an established camp.

**BLM RFO Response to Public Comment**

3) The BLM acknowledges the commenter's lack of support for Key Action 1 and the BLM will fully consider this input in the selection of the range of alternatives. The No Action alternative remains a possibility for selection.

**Name of  
Draft Review  
Commenter**

Daniel Wheeler

**Public Review Comment Submitted to  
Rawlins Field Office**

1) I understand the need for revenue generation and am in full support of charging for access and camping in the Corral Creek, this also acts as a means for self selection...those that care will still come.

I first visited corral creek in the womb, as my family as been coming to the Platte since well before I was born.

I remember that we would frequent Bennet Peak often until the weekend college crowd with their rafts and canoes became too heavy to get a camping spot in the summer. It didn't help the fishing either. That was many years ago and we haven't been back since.

2) With the addition of a hardened boat launch and turn-around I am concerned that Corral Creek will become another Bennet Peak with trash left all over the area and little regard for the preservation of the resource.

I am 24 years old, so I understand the college outdoor crowd, but unfortunately very few of this same crowd was brought up with the tenets of sustainability that I was.

**BLM RFO Response to Public Comment**

1) The BLM acknowledges the commenter's support for a fee action and this support will be considered in the selection of the range of alternatives for Key Action 5.

2) The BLM will give full consideration of the commenter's lack of support for a hardened boat launch and river access at Corral Creek in the site-specific analysis for Key Action 5.

**Name of  
Draft Review  
Commenter**

Daniel Wheeler,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

3) There is the notion that "I have used this area for my pleasure, someone else will clean it up" among far too many people. I have seen it during hunting season in all too many states, I've seen it in a sad number of trail races across the U.S., and in far too many fishing areas. The land and the mountains are treated as prostitutes...to be used and discarded with no effort at sustainability. I will assume that outfitters are also pushing for the launch to be put in. I've known some good outfitters and some terrible ones, just like all walks of life. The outfitter lobby is strong in Wyoming as is shown in the Hunting Regulations, I hope Corral Creek does not simply turn into a hub for outfitters. I will close with this, I am not privileged to live near the platte yet, but I hope some day to take my kids their and find the same untouched wildness I've come to love. If not I will stop coming back year after year. While this would be unfortunate, there are still wild places that only the motivated frequent, and I will be fine there as well. I will add that I have seen many motivated people launch canoes out of corral creek. It can be done. Putting the ramp and slide in will make it easier for the unmotivated and the unconcerned for the resource they use. I trust you all to make the decision that is best for the preservation of corral creek as one of the gems of southern Wyoming.

**BLM RFO Response to Public Comment**

3) The preferred alternative for Key Action 2: Leave No Trace Education, if selected, would also be implemented at Corral Creek. Under this preferred alternative, if monitoring data indicated that resource conditions such as littering, trampling, and erosion needed to be addressed then adaptive management could allow for requiring LNT practices (i.e., carry-in/carry-out) or possibly a seasonal BLM staff, campground host, or volunteer assigned to help steward the resources at Corral Creek.

There are many opportunities for dispersed use and dispersed camping in close proximity to the Corral Creek area on public lands and the opportunities to camp and experience "wild places" would remain no matter which alternative is selected for Corral Creek.

The range of alternatives for Key Action 5 includes the No Action/Existing Conditions alternative. The BLM will give full consideration to the No Action alternative when considering this comment in the selection of alternatives.

The BLM is providing a National Public Lands Day on September 28th of 2013 to enhance the appearance and conditions of Corral Creek Campground and invites your participation as a volunteer to help steward this area.

**Name of  
Draft Review  
Commenter**

Garry Miller,  
The Overland  
Trail Cattle  
Company, LLC

**Public Review Comment Submitted to  
Rawlins Field Office**

1) Public Engagement  
We compliment the BLM on its outreach to recreational stakeholders; however, it appears that the BLM failed to directly notify and engage other affected parties. According to the RAMP/EA, the objectives for the North Platte River Special Recreation Management Area (SRMA) include “mitigate conflicts with other resource values and uses as appropriate, in coordination and cooperation with affected interests.” The document does not adequately reflect coordination or cooperation with the grazing leaseholders and private landowners along the river – groups whose interests are potentially affected by the RAMP. At a minimum, BLM should have provided direct notice through the U.S. Mail to all landowners within the planning area.

**BLM RFO Response to Public Comment**

1) The BLM provided a press release on April 25, 2013 which was released to the Associated Press. TOTCO and other landowners in the Saratoga, WY area have access to these press releases which were published in the Saratoga Sun newspaper and announced on Big Foot 99 Radio station as well as other press outlets in the region. The BLM is only required to provide a press release and any email announcements are a courtesy and not a requirement. An email list for the public meetings was formerly approved by the BLM Senior Planner in the Fall of 2012 before both the public and agencies meetings were held. The Boat-in Campground had been eliminated from the Opportunities for Action by the ID Team before these meetings and at the request of WGFD, the opportunity was reinstated for consideration. The BLM has acknowledged the commenters concern about notification and has provided a 10 day extension for their public comment to be considered. While TOTCO does own land adjacent to the planning area and one proposed project site within the planning area (see Key Action 1, Boat-in Campground), none of the proposed projects would be constructed on or through private land. With that said, the BLM would respond to any potential concerns of social impacts and trespass on nearby private landholdings by providing the appropriate mitigations, enforcement and education of regulations, and cooperation with the landowners as would occur with similar recreation sites in the RFO.

Name of Draft Review Commenter	Public Review Comment Submitted to Rawlins Field Office	BLM RFO Response to Public Comment
Garry Miller, The Overland Trail Cattle Company, LLC, cont...	<p>2) Document Organization</p> <p>The document does not adequately outline and separate the plan (the RAMP) from the required environmental analysis of the plan (the EA). We suggest that the document be reorganized to eliminate co-mingled content and make clear what comprises the management plan and what comprises the environmental assessment. The text indicates that the RAMP is being revised and we assume that the No Action alternative reflects the existing management plan; however, this is not entirely clear. The BLM should clarify the No Action alternative by adequately summarizing and cross-referencing the existing RAMP. Further, in regards to the action alternatives, the document discloses only “key actions.” It is unclear if there are other actions being pursued by BLM that are not “key;” if so, those actions should be disclosed to the public. The document does not clearly describe or depict the planning area. A map titled “North Platte River RAMP Planning Area” was made available concurrent with the RAMP/EA. First, if the map is intended to provide information critical to the understanding of the RAMP/EA, it should be made a part of that document.</p>	<p>2) The NPRRAMP and EA follows the format of similar RAMP EAs recently published by the BLM including the following documents:  The Trapper's Route RAMP EA (WY-060-EA06-107)  <a href="http://www.blm.gov/wy/st/en/info/NEPA/documents/cfo/trappersroute.html">http://www.blm.gov/wy/st/en/info/NEPA/documents/cfo/trappersroute.html</a>  Sixes River RAMP EA (OR128-99-13)  <a href="http://www.blm.gov/or/districts/coosbay/plans/files/SixesRecPlanEA.pdf">http://www.blm.gov/or/districts/coosbay/plans/files/SixesRecPlanEA.pdf</a>  Hartman Rocks RAMP EA (DOI-BLM-CO-S060-2011-0004-EA)  <a href="http://www.blm.gov/pgdata/etc/medialib/blm/co/information/nepa/gunnison_field_office.Par.85838.File.dat/Final%20Draft%20EA.pdf">http://www.blm.gov/pgdata/etc/medialib/blm/co/information/nepa/gunnison_field_office.Par.85838.File.dat/Final%20Draft%20EA.pdf</a></p> <p>The NPRRAMP EA meets all of the BLM NEPA Handbook requirements for the contents of an EA. There is no mention in the handbook for providing planning sections or content in separate chapters.</p> <p>The term “key actions” is now defined in the NPRRAMP EA to refer to those actions under analysis in the EA and specifies that no other actions are under consideration at this time and within this document.</p> <p>The North Platte River RAMP Planning Area map is now cited with a weblink to the RAMP website in the references. The map legend now includes the North Platte RAMP planning area within the SRMA. Page 1 of the draft already defines the planning area:</p> <p><b>“The planning area includes only those lands within the SRMA along the North Platte River and within the RFO which are not surrounding the Encampment River. The scope of the planning area for the North Platte River RAMP (NPRRAMP) includes parcels of land within the SRMA boundary from the Prospect Creek confluence to Seminole Reservoir covering 110 river miles. This planning area includes both the Upper and Lower Platte River Watersheds.</b></p> <p><b>On page 1, 1st paragraph, the Draft NPRRAMP EA has now been changed to state "parcels of public land within the SRMA boundary."</b></p>

<b>Name of Draft Review Commenter</b>	<b>Public Review Comment Submitted to Rawlins Field Office</b>	<b>BLM RFO Response to Public Comment</b>
Garry Miller, The Overland Trail Cattle Company, LLC, cont...	Second, it remains unclear from both the map and the text whether the planning area is limited to those areas on the map identified as “Special Recreation Management Areas on BLM-administered public lands,” or if the planning area is intended to be broader.	Same as Response #2

**Name of  
Draft Review  
Commenter**

Garry Miller,  
The Overland  
Trail Cattle  
Company, LLC,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

3) Background Information  
The RAMP/EA should acknowledge and describe in its analysis the limitations on the use of the river by the public. Under Wyoming law, the public is allowed to float on Wyoming navigable waters. Boaters are not, however, allowed to walk or wade along privately owned stream banks or stream bottoms. Day v. Armstrong, 362 P.2d 137 (Wyo. 1961). Any person who does so can be found guilty of criminal trespass under W.S.A. § 6-3-303. The BLM recognizes this under its Wyoming Public Lands Access Guide which, while acknowledging that floating rivers to access public lands is allowable, notes that any use of the stream bed or bank itself (other than incidental contact) is strictly prohibited without landowner permission.  
The document also briefly references the Rochelle Easement along the North Platte River that is held by the Wyoming Game and Fish Department. To prevent misinterpretation of the recreation opportunities available through the Rochelle Easement, the document should also describe and include the location and limitations of the easement.

**BLM RFO Response to Public Comment**

3) The Draft NPRRAMP EA, Chapter I (pg. 1) now provides a summary of the existing guidelines for the Wyoming trespassing laws stated below:  
In the establishment of case law under the decision of Day v. Armstrong, 362 P.2d 137 (Wyo. 1961), the WY Supreme Court ruled the following:  
**"that even though certain waters of the state might not be defined as navigable; the riparian owners have title to the bed and the channel, but the title is subject to an easement for a right of way of the river waters in their natural channel through, over, and across the owners land"... "persons so floating in usable watercraft may, when necessary, disembark and walk or wade upon submerged lands in order to push, pull, or carry watercraft over or across shallows, riffles, rapids, or obstructions; that while so floating in usable watercraft the public may fish or hunt or do any and all other things which are not otherwise made unlawful, but the State is without power to authorize the violation of any property rights of riparian owners or other owners except as incident to the full exercise of easement to which property may be subject."**

To respond to this comment, Page 1 of the NPRRAMP EA now contains the following addition:

**"The rules concerning navigation and river access on the North Platte River through private land can often be complex. A number of public easements for fishing and floating are managed by the Wyoming Game and Fish Department on the Lower North Platte and provide some limited public access. Public river access on the Upper North Platte, primarily, requires access to federally managed boat launches. Portages onto private lands require following special rules, under direction of case law. This case allows the carrying of watercraft (only) through private land within the bounds of the natural river channel and portaging must be justified by obstacles impeding progress down the river (see 1961 Day v. Armstrong, Wyoming Supreme Court decision)."**

**Name of  
Draft Review  
Commenter**

Garry Miller,  
The Overland  
Trail Cattle  
Company, LLC,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

The Rochelle Easement allows public access to the North Platte River for the purposes of fishing and waterfowl hunting only, including use of the specified roads and parking areas, but specifically prohibits overnight camping and provides that the use of the easement shall not unreasonably conflict with the retained land and water rights.

We can provide a copy of the Rochelle Easement upon request. BLM should clarify the limitations of the recreation opportunities afforded by the Rochelle Easement in the RAMP/EA.

**BLM RFO Response to Public Comment**

The above interpretation was supported a recent phone call with the WGFD game warden who enforces this law within the planning area. The warden did state that any stepping out of the craft to wade fish or to do anything other than carry the craft downriver through this right of way on public land would be an enforceable trespassing violation under W.S.A. § 6-3-303.

To respond to the commenter's concern and a recent comment from the WGFD, the BLM has slightly modified the Preferred Alternative for Key Action 4. This alternative now states that in the provision of an educational kiosk, this kiosk would also include a map showing the SRMA and private landholdings along with direction to facilities and recreation sites. As per a recent request by WGFD, the preferred alternative now states that this kiosk would also include a posting from WGFD stating the above navigation, ownership and rules (i.e., trespassing).

**Name of  
Draft Review  
Commenter**

Garry Miller,  
The Overland  
Trail Cattle  
Company, LLC,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

According to the document, the “purpose in rewriting the RAMP is to use new information to better manage the planning area for high-quality recreation opportunities, reduce conflict, as well as to meet standards for public safety and health.” The need for the RAMP set forth on page 4 of the document, describes the following existing issues:

- 4) • “Increasing levels of peak use exceeding social condition indicators for Middle Country settings at recreation sites within the Special Recreation Management Area (SMRA).”
- 5) • Conflicts and degradation of the visitor experience caused by littering, trespassing and crowded conditions at put-ins, take-outs, parking areas and campgrounds.
- 6) • Demand for Special Recreation Permits (SRP).
- 7) • Impacts to the area’s natural resources from permitted commercial use and unregulated private recreational use along the river and its riparian areas. Such impacts include “loss of ground cover and riparian vegetation, soil compaction, riverbank erosion, and human waste.” It is unclear how the alternatives developed will alleviate these issues and meet the purpose and need. in the document.

**BLM RFO Response to Public Comment**

4) The following statement has now been removed from the Draft NPRRAMP EA: “Increasing levels of peak use exceed social condition indicators for Middle Country settings at recreation sites within the Special Recreation Management Area (SMRA).” The BLM has reconsidered the above statement based on WGFD's comment on the Draft NPRRAMP EA. The encounter data provided by the former recreation planner in Table 4 is now interpreted by the BLM to not provide evidence of an exceedance of Middle Country Standards as he had previously reported. No reports of exceedances will be included in the Final NPRRAMP EA.

5) The statement "Conflicts and the degradation of the visitor experience caused by littering, trespassing and crowded conditions at put-ins, take-outs, parking areas and campgrounds" has been replaced with a discussion referring to peak-use at Bennett Peak Campground (see pg. 4).

6) Demand For SRPs is considered in the range of alternatives for Key Action 3: North Platte River SRP Permit Allocations

7) Each of these impacts is considered in the range of alternatives and their analysis for Key Action 2: Leave No Trace Education. The proposed LNT program would educate the public on how to mitigate these impacts both with using carry-in/carry-out and by using hardened and sandy surfaces for camping and travel to avoid shoreline erosion.

<b>Name of Draft Review Commenter</b>	<b>Public Review Comment Submitted to Rawlins Field Office</b>	<b>BLM RFO Response to Public Comment</b>
Garry Miller, The Overland Trail Cattle Company, LLC, cont...	It is in fact possible that if implemented without the appropriate avoidance, minimization and mitigation measures, some alternatives could exacerbate the issues set forth	Same as Response #7

**Name of  
Draft Review  
Commenter**

Garry Miller,  
The Overland  
Trail Cattle  
Company, LLC,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

8) Table 2 of the RAMP/EA establishes seven “key actions” intended to address issues identified by the interested public, agencies and the BLM interdisciplinary team. Under the sections entitled “Alternatives for Future Consideration” and “Alternatives Given Full Analysis,” only the first six actions are discussed. The status of key action 7 is unclear and must be addressed in the final EA.

9) When discussing the key actions, the RAMP/EA fails to identify how each key action will meet the desired management outcomes and further, does not set forth any management standards against which the efficacy of the key actions may be evaluated. For example, one of the key issues identified is increased visitor use and crowding at Bennett Peak Campground on peak weekends. Key action 4, which is to increase parking and expansion of the boat ramp, is apparently intended to address this issue; however, the RAMP/EA fails to provide any meaningful analysis and discussion of the desired management condition. For instance, if the management goal is to reduce overcrowding and wait times, then the RAMP should set a management objective (e.g., increase visitor occupancy by 20% and reduce waiting times during peak periods by 25%).

**BLM RFO Response to Public Comment**

8) Key Action 7 will now be included in the section titled "Alternatives for Future Consideration and should have been in the original draft.

Key Action 7 was referred as needing future site-specific analysis elsewhere throughout the Draft NPRRAMP EA including Appendix XVI (pg. 78) which states Future Proposed Projects.

9) The NPRRAMP now states under sections entitled “Alternatives for Future Consideration” and “Alternatives Given Full Analysis” how the action alternatives being considered would meet or not meet SRMA objectives. It is agreed that a quantitative management objective would assist the BLM with monitoring the conditions at Bennett Peak. The preferred alternative for Bennett Peak now states that there will be outcome measures established during the monitoring period to determine the effectiveness of implementation. This effectiveness will include measures such as those to assess illegal parking outside of designated parking areas (i.e., along the roundabout) and any reduction in launch wait times during peak use weekends and holidays. Without a season's worth of baseline data collected for current launch wait times, it would be an inappropriate method to blindly predict set percentages for the suggested outcome measures. However, the NPRRAMP "Implementation and Future Monitoring Strategies" chapter (see pgs. 46-47) does already state that compliance and effectiveness monitoring data would be collected. However, to respond to this comment, the Draft now states: "Site-specific and planning area-wide outcome measures will be established to determine compliance and effectiveness of any selected actions and the results of this assessment will be recorded and available for public review upon request."

**Name of  
Draft Review  
Commenter**

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10) The RAMP should then describe actions to achieve those objectives (e.g., add 10 parking spaces and double size of existing boat ramp). Setting management objectives and standards allows both BLM and the public to judge the efficacy of the action alternatives. For instance, in the above example, would the preferred alternative of adding 10 parking spaces and doubling the existing boat ramp satisfy the management goal? The EA can then meaningfully analyze and disclose to the public the environmental impacts of this alternative and allow a comparison of other alternatives that meet or substantially meet the BLM's purpose and need. The RAMP/EA is deficient in that the document fails to adequately disclose the desired outcomes or identify how the proposed management actions will achieve the desired outcomes. The RAMP/EA does not set forth avoidance measures, minimization measures or best management practices that might prevent or minimize undue and unnecessary degradation of public lands. Furthermore, the RAMP/EA does not disclose whether BLM is currently applying such measures and the failure or success

**BLM RFO Response to Public Comment**

10) In response to this comment, the Preferred Alternatives for Key Actions 1, 4, 5, 6, and 7 have all been modified on pgs. 19-23 to state "Provide ongoing monitoring to determine adaptive management."

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Garry Miller, The Overland Trail Cattle Company, LLC, cont...	<p>of those measures in achieving management goals and objectives. The RAMP/EA also fails to set forth any mitigation measures to compensate for unavoidable impacts. The RAMP/EA should be revised accordingly and recirculated for public comment.</p> <p>The RAMP/EA fails to develop and analyze an adequate range of alternatives. The action alternatives all analyze expanded recreational river use. The BLM should analyze an alternative which, when combined with avoidance, minimization and mitigation measures, will minimize impacts to natural resources impacted by recreational use (i.e., loss of ground cover and riparian vegetation, soil compaction, riverbank erosion, and human waste).</p>	Same as Response #10

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NEPA Tiering  
Section VI of the RAMP/EA provides a  
“Description of Alternatives including the  
Preferred Alternatives,” and subsection C  
describes “Alternatives for Future Consideration”  
as follows:

11) For purposes of this document, there will not  
be a detailed, site-specific analysis provided for  
key actions 1 (Boat-in Campground), 5  
(Improvement of Corral Creek Campground),  
and 6 (Improvement of Prospect Road Access).  
Furthermore, the  
implementation of projects proposed in preferred  
alternatives for key actions 1, 5, and 6 will not be  
considered until this site-specific analysis has  
been considered and additional National  
Environmental Policy Act documents have been  
tiered to this RAMP EA.

References are made throughout the rest of the  
document that future NEPA analysis and  
documentation will be “tiered” to the RAMP/EA  
analysis. However, as outlined in the resource  
concerns sections below, it is not appropriate to  
“tier” any future NEPA documents to this  
RAMP/EA because this RAMP/EA does not  
fully or adequately analyze the resources and  
potential impacts of the range of management  
actions over the entire planning area.

**BLM RFO Response to Public Comment**

11) The Draft NPRRAMP EA does provide a broader analysis for most all  
disciplines entitled "Impacts Common to All Action Alternatives." An analysis of  
the broader impacts common to all action alternatives within the entire planning  
area is contained with these sections. For example, Page 39 of the existing Draft  
includes the following statement, "The potential for increased recreational use  
caused by implementation of the action alternatives could affect the livestock  
grazing conditions within and surrounding the planning area."

Previously, the Hydrology, Vegetation, and Soils specialists on the ID team chose  
to defer their broader analysis of "impacts common to all action alternatives" to the  
forthcoming site-specific analysis because of the site-specific nature of their  
specialist analysis. However, to further respond to this comment, the BLM has now  
modified the Draft to also include an additional paragraph of the "Impacts Common  
to All Action Alternatives" for the Hydrology, Vegetation, and Soils sections of the  
EA.

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12) The document fails to provide the public with even basic general estimates of how many acres of long-term surface disturbance would be caused by constructing new parking lots, roads and campgrounds in the SRMA, for example, under key actions 1, 5 and 6. Unlike other NEPA documents prepared by the BLM Rawlins Field Office, this RAMP/EA does not provide an impact analysis at a project-wide level “based on resource-specific assumptions, estimated project disturbance, and appropriate project-specific stipulations” across the planning area.

13) Further, according to BLM’s Appendix B: NEPA Tiering Review Procedures, as contained within the Record of Decision for the Chokecherry and Sierra Madre Wind Energy Project, tiering is only appropriate “when the analysis for the proposed action will be a more site-specific or project-specific refinement or extension of the existing NEPA document.” In order to adequately disclose and discuss the potential impacts of key actions 1, 5 and 6 and to fully comply with NEPA requirements, detailed and complete environmental analysis will need to be performed regarding each of these actions over the planning area, therefore these future documents will not meet the “refinement” or “extension” tiering standard previously described by BLM.

**BLM RFO Response to Public Comment**

12) The Cumulative Impacts section of the Draft NPRRAMP EA does currently provide a broad analysis of the incremental impact common to all action alternatives for the entire planning area. For example, this section of the Draft currently states the following: "Visual contrast related to soil erosion, root exposure, and soil compaction would occur with additional trampling, camping, removal of vegetation and ground cover for fire rings, vehicle use, and littering. In addition, the growing number of recreation users and their vehicles increase the spread of exotic weeds throughout the SRMA."

13) To respond to this comment, the following statement was added on page 12 of the EA:

**"All tiering to the NPRRAMP EA will follow the guidelines set forth in Section 5.2.2 of the BLM NEPA Handbook."**

The BLM NEPA Handbook section 5.2.2 on page 27 and 28 provides guidelines for tiering to a broader NEPA document. The Draft NPRRAMP EA follows all of these guidelines. The commenter should refer to the above Response #3 and a previous response to a comment from Jim B. States.

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In addition, the RAMP/EA does not describe or disclose the anticipated tiering review procedures and processes that may be used, which precludes the public from being able to provide informed comment on the adequacy and appropriateness of the tiering review plan. Should a tiering approach ultimately be used, then the EA should include a detailed tiering review plan.

14) Visual resources: The RAMP/EA references the Visual Resource Management Plan Amendment approved in conjunction with the Record of Decision for the Chokecherry and Sierra Madre Wind Energy Project in October 2012 (VRM ROD). The description of visual resources in the RAMP/EA states that the planning area contains Visual Resource Management (VRM) Classes II, III and IV. More specifically the RAMP/EA states that the planning area sections from Saratoga to just north of I-80 are designated as VRM Class IV. We note; however, that the VRM ROD designates scenic quality rating units encompassing the North Platte River outside of major utility and transportation corridors as VRM Class II. Because the RAMP/EA inaccurately describes the existing VRM classification of lands within the planning area, it appears that the information used to complete the impact analysis is erroneous.

**BLM RFO Response to Public Comment**

14) The visual impact analysis for the river sections from Saratoga to I-80 were already updated in the Draft before receiving this response. The Final NPRRAMPA EA will contain the appropriate VRM II classification of some very small parcels of land within the North Platte River SRMA between Saratoga and I-80. These VRM II areas were difficult to visually recognize, due to their small size, in the maps provided within the VRM ROD. The only project proposed within the NPRRAMPA that would lie within VRM II is Key Action 1: Boat-in Campground. None of the development proposed within the action alternatives for the boat-in campground would be inconsistent with VRM II objectives. Therefore, there is no need to recirculate the draft for public review and comment on this basis as any comments would not change the objectives and conformance of the potential project to VRM II. With that said, TOTCO is welcome to comment on the forthcoming tiered NEPA document for Key Action 1 at such a time when public comments are requested in the review process for that document.

Site-specific analysis for the Proposed Boat-in Campground (Key Action 1) would provide for recommendation of visual mitigation strategies for the proposed toilet. This mitigation could include any environmental color coding to blend the facility with the surrounding scenery.

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If the analysis is in fact flawed, the BLM cannot make a conclusion on the significance of the impacts. The Visual Resource analysis and discussion in the RAMP/EA should be revised to reflect the correct VRM classifications and should be recirculated for public review and comment.

15) Recreation: While the RAMP/EA describes the beneficial impacts of ending the moratorium on new SRP permits to outfitters and guides, and local businesses in general, but it fails to describe the potential adverse impacts to local agricultural operators and grazing allottees. The RAMP/EA does disclose that implementation of key action 3 (SRP Permit Allocation) would impact the physical setting of the planning area through additional recreational user impacts, but does not fully discuss the extent of such impacts. Such adverse impacts may include increased trespass, destruction of private property including range improvements, increased litter and human waste, harassment of livestock and increased risk of fire. The RAMP/EA fails to provide adequate analysis of increased use of the river on private land and agricultural operations through ending the moratorium on SRP permits.

**BLM RFO Response to Public Comment**

15) Impacts of recreation to livestock grazing are already reported in the existing Draft on pages 40-41:

Impacts Common to All Action Alternatives

**“The potential for increased recreational use caused by implementation of the action alternatives could affect the livestock grazing conditions within and surrounding the planning area. In areas where rafters can access the river, use is concentrated during the spring and summer when calves are younger and more susceptible to injury. This can also cause disruption to livestock operations through the potential of harassment and disturbance to livestock. Fences and gates may be damaged or left open resulting in livestock movement to other allotments. The potential for trespass could increase with an increase in recreational use if not properly mitigated. However, the additional signing proposed in the action alternatives for Key Actions 1 and 4 would mitigate this potential impact and is expected to cause a decrease in the number of trespassing violations. Furthermore, the risk of fire with addition of campsites could also have the potential to increase without proper mitigation. All proposed campsites (see Key Actions 1 and 5) would be developed to contain metal fire rings which would actually decrease the risk of fire in comparison to existing conditions with dispersed camping. Increased erosional issues with respect to roads also results in reducing the available forage for both livestock and wildlife. In addition, fugitive dust caused by vehicles traveling these access roads settles on vegetation used as forage, especially alongside roadway corridors with heavy traffic. This dust potentially affects the quality and regenerative capacity of roadside grasses and forbs as well as decreases the palatability of the forage for livestock/wildlife use and potentially increases operating costs by affecting livestock health.”**

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As such, the document contains insufficient public disclosures and the analysis is inadequate to conclude that there will be no significant impacts. The RAMP/EA should be revised to address these issues and recirculated for public comment. Should BLM adequately review the significance of the impacts and choose to implement key action 3, BLM should commit to measures to avoid and minimize adverse impacts. While implementing the Leave No Trace program could help avoid or minimize some impacts, we are skeptical that the Leave No Trace program alone will adequately mitigate these adverse effects. The BLM should identify additional avoidance, minimization and mitigation measures and should provide additional information and analysis supporting its assumptions regarding the effectiveness of the Leave No Trace program. The BLM should consider management actions such as routine river patrols and enforcement, additional river signage informing users of sensitive areas, and closing areas to use when impacts exceed standards for healthy rangelands or have the potential to affect BLM sensitive species. The BLM should outline its commitment to these measures as well as demonstrate how the cost of such measures would be borne by the BLM.

**BLM RFO Response to Public Comment**

The BLM has no jurisdiction to manage for trespass or any other act by the public on private lands. However, to fully respond to this comment, the Preferred Alternatives for Key Actions 1 and 4 have been modified to include additional signing of rules and boundaries that pertain to access and trespass of private lands. With these potential mitigations it is expected that trespass to private land may actually decrease in frequency. Furthermore, the fire rings proposed in Key Action 1: Boat-in Campground (the only proposed project adjacent to TOTCO landholdings) would not provide an increased risk of fire but would actually mitigate and most likely provide a decrease in the risk of fire above and beyond the site's current use for dispersed camping. This discussion of fire is now included under the impacts to Livestock Grazing section. The mitigation of human waste is expected to be effective with the potential implementation of the Leave No Trace Program. Carry-in/Carry-out of human waste is a component of educating the public. Under the Preferred Alternative in Key Action 2, adaptive management could include regulations to require carry-in/carry-out of human waste or additional restrooms if monitoring conditions warranted. These types of mitigation would be expected to actually decrease the level of human waste. This mitigation of human waste is already discussed in the existing Draft as written.

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Cultural resources:  
1) The RAMP/EA states that there are no known cultural properties within the preferred alternative areas. It is unclear what the “preferred alternative areas” are as the term is not defined in the document. The RAMP/EA further states that it is unlikely cultural properties would be located immediately adjacent to the river within the modern floodplain. This statement is incorrect. Within the planning area, there are cultural properties listed in or eligible for listing in the National Register of Historic Places (historic properties). For example, the Overland Trail Platte River Crossing Stage Station and North Platte Crossing and Cemetery, both of which are adjacent to the river and, in the case of the river crossing, within the floodplain, are historic properties within the SRMA.

**BLM RFO Response to Public Comment**

1) To respond to this comment, “preferred alternative areas” has been modified in the NPRRAMP EA on page 22 to "**proposed project areas for Key Actions 1, 4, 5, 6, and 7.**"

Based on a record search of the NPRRAMP, there are no known historic properties within the proposed project areas. The Overland Trail Platte River Crossing Stage Station and the North Platte Crossing and Cemetery do not occur within the modern floodplain, nor do they occur within the NPRRAMP project area (see project map).

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2) While the RAMP/EA states that the potential for these types of impacts will be minimized through inventories and appropriate avoidance and minimization measures, the document fails to identify a single avoidance or minimization measure that may be applied. The RAMP/EA states that implementation of the RAMP has the potential to directly, indirectly, and cumulatively impact historic properties. Potential impacts could be physical destruction and displacement by surface disturbing activities, and vandalism and illegal collection through increased access and use.

**BLM RFO Response to Public Comment**

2) No historic properties that would be adversely affected have been identified within the NPRRAM project area. If historic properties are identified that would be adversely affected, the project would be redesigned to avoid adverse effects to historic properties. There is the potential for increased recreational use with the implementation of action alternatives which provide the public and outfitters additional access to the North Platte River. Any potential increases in visitor use could lead to increased vandalism. To mitigate these potential impacts, the BLM will provide signs and maps at the proposed Bennett Peak Campground kiosk which identifies these issues and provides rules to avoid their impairment.

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3) The document does not include any meaningful analyses, and fails to adequately describe identification efforts undertaken to date. At a minimum, BLM should perform a Class I file search of the entire planning area and provide a qualitative discussion of the results of the inventory so that the public may understand the types and relative number of cultural resources that may be found within the planning area and historic properties that may be adversely affected by the action alternatives.

4) For the Bennett Peak Campground, BLM states that it completed site-specific cultural resource inventories. BLM should disclose whether these inventories met the standards for Class III inventories.

5) BLM says that “standard cultural resource design features that address buried discoveries” would apply and would minimize the potential for loss or destruction to unanticipated historic properties. However, the document omits any description of the standard design features so it is impossible for the public to reasonably evaluate whether the design features would in fact minimize potential for loss or destruction.

**BLM RFO Response to Public Comment**

3) A Class I records search was completed for the NPRRAMP project area, and there are no known historic properties within the proposed project areas. Site-specific cultural resource inventories to locate and evaluate any prehistoric or historic cultural resources will be required for the areas proposed for disturbance that have not been inventoried.

4) The site-specific cultural resource inventories for the Bennett Peak Campground met the standards for Class III inventories.

5) The standard cultural stipulation that addresses buried cultural discoveries includes the following language: “If any cultural materials are discovered during construction, work in the area shall halt immediately, the federal agency and SHPO staff be contacted, and the materials be evaluated by an archaeologist or historian meeting the Secretary of the Interior’s Professional Qualification Standards (48 FR 22716, Sept. 1983).” Any cultural discoveries would be evaluated by the authorized officer, and the appropriate mitigation measures would be determined in consultation with the SHPO.

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6) The BLM should prepare a plan for inadvertent discoveries and provide a discussion in the RAMP/EA of such plan and disclose how the plan will minimize potential for loss or destruction of historic properties.

7) The RAMP/EA states that site-specific cultural resource inventories will be required for the areas proposed for disturbance that have not been inventoried. However, Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic properties prior to implementation of the undertakings.

**BLM RFO Response to Public Comment**

6) An inadvertent discovery plan is not necessary for this project. The potential for inadvertent discoveries is low in the NPRRAMP project areas. The standard cultural stipulation that addresses buried cultural discoveries and the procedures in the Wyoming State Protocol adequately address the procedures for inadvertent discoveries.

7) The BLM has taken into account the effect of the undertaking on historic properties prior to implementation of the undertaking. A site-specific cultural resource inventory has been conducted for the Bennett Peak Campground area, and there are no historic properties that would be affected by the proposed developments. Additionally, a Class I records search was conducted for the NPRRAMP project area, and no historic properties were identified. Site-specific cultural resource inventories will be conducted for any future undertakings that may result from this plan.

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Garry Miller, The Overland Trail Cattle Company, LLC	<p>8) It also requires Federal agencies to provide the Advisory Council on Historic Preservation (ACHP) with the opportunity to comment on such undertakings, if there is a potential to affect historic properties. The BLM admits that implementation of the RAMP has the potential to directly, indirectly and cumulatively impact historic properties. The RAMP/EA does not state whether the ACHP or the public has been afforded an opportunity to participate in the Section 106 process or an opportunity to comment on the undertaking's potential to adversely affect historic properties.</p> <p>9) ACHP regulations also allow the BLM and the ACHP to negotiate a programmatic agreement to govern the implementation of the RAMP and the resolution of adverse effects. The RAMP/EA; however, does not state whether BLM in fact did developed a programmatic agreement for implementation of the RAMP. Based upon the RAMP/EA, it appears that BLM has failed to meet its obligations under Section 106 and, absent such compliance, may not proceed with its decision record on the RAMP. For the reasons set forth above, the RAMP/EA contains insufficient information to conclude that the preferred alternative will not have a significant impact on cultural resources.</p>	<p>8) It also requires Federal agencies to provide the Advisory Council on Historic Preservation (ACHP) with the opportunity to comment on such undertakings, if there is a potential to affect historic properties. The BLM admits that implementation of the RAMP has the potential to directly, indirectly and cumulatively impact historic properties. The RAMP/EA does not state whether the ACHP or the public has been afforded an opportunity to participate in the Section 106 process or an opportunity to comment on the undertaking's potential to adversely affect historic properties.</p> <p>9) The NPRRAMP does not meet any of the criteria at 36 CFR 800.14 for when a programmatic agreement would be used for the BLM to meet its obligations under Section 106. The effects on historic properties will be fully determined prior to approval of any undertaking associated with this project.</p>

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The cultural resources section should be revised to correct the deficiencies set forth above and the EA should be recirculated for public comment.

10) Water resources, soils and vegetation: The RAMP/EA fails to consider that increased use in parking and camping areas and establishment of new parking and camping areas in the planning area could lead to soil compaction and increased surface runoff. These changes could increase potential for new erosional features downstream from the parking/camping areas as well as altering water quality, vegetation communities and reclamation potential. The document fails to analyze these impacts and does not identify any avoidance, minimization or mitigation measures to address these impacts; therefore the RAMP/EA fails to establish that the preferred alternative will not have a significant impact on soil, vegetation or water resources.

**BLM RFO Response to Public Comment**

10) The following addition of a broader impact analysis for Water Resources is now provided in the Draft:

D. Water Resources

**Impacts Common to All Action Alternatives**

**The potential for increased recreational use caused by implementation of the action alternatives could affect the water resource conditions within and surrounding the planning area. Trampling, dispersed camping, vehicle and OHV ground disturbance and dust could potentially affect soil stability and water quality within the Upper and Lower North Platte River watersheds. In addition, the level of incidental human waste occurring through a potential increase in overall recreational use could also contribute to a degradation in water quality within and downstream of the planning area. Impacts caused by human waste, trampling, camping and OHV use would be mitigated with the proposed implementation of any of the action alternatives for Key Action 2: Leave-No-Trace Education (i.e., stay on designated trails and roads, carry-in/carry-out of human waste). Speed limit signs would be posted and maintained to mitigate the levels of dust and ground disturbance generated by vehicles within the planning area. Potential impacts from surface run-off could occur at proposed parking areas without proper mitigation. Parking spaces and tent sites would remain covered with native grasses or sand. Reclamation plans including the seeding of native grasses would provide for mitigation of the potential impacts of surface runoff. Runoff would be similar to the existing condition with reclamation. Monitoring of erosional features will occur and if monitoring shows that there is accelerated erosion occurring, erosion and sedimentation controls will be implemented until native, stabilizing vegetation is established.**

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Garry Miller, The Overland Trail Cattle Company, LLC	<p>While a Reclamation Plan for the Bennett Peak Campground (Appendix D) is provided and we recognize that the level of detail in a reclamation plan should reflect the level of complexity of the project, there simply is not enough detail in the reclamation plan to assess whether the plan would be adequate to reclaim and revegetate disturbed areas. There are no calculations of surface disturbance, identification of representative project-specific design features, consideration of soil handling and stabilization processes, seedbed preparation methods, and appropriate seed lists presented. The plan also does not establish long term reclamation or success criteria. The reclamation plan presented in the RAMP/EA is not sufficient to insure that reclamation will be successful and does not appear to meet the minimum standards of the Rawlins Reclamation Policy.</p>	Same as Response #10

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11) Finally, the Rawlins Field Office has zero tolerance for noxious weeds and we have been informed that measures designed to merely control noxious weeds are unacceptable – that noxious weeds must be eradicated. The reclamation plan presented in the RAMP/EA relies upon control of noxious weeds through an integrated management plan. To comply with Rawlins Field Office policy, the reclamation plan should describe actions to be taken to prevent and eradicate noxious weeds.

12) Fisheries: The analysis of fisheries impacts in the RAMP/EA does not properly disclose the potential impacts to the resource. The analysis presented in the RAMP/EA focuses only on impacts to populations resulting from possible habitat changes and fails to consider impacts to fisheries resulting from increased use of the fisheries resource by recreational anglers. Increased angling pressures could impact area populations through direct injury and mortality, increased violations of bag and slot limits, decreased reproduction or changes in behavior to avoid angling pressure. The RAMP/EA should be revised to disclose these additional potential impacts to fisheries.

**BLM RFO Response to Public Comment**

11) The reclamation plan was modified with one addition. The plan now states on pg. 87 that "noxious species will be controlled and/or **eradicated** using an integrated management approach. This may include manual removal, chemical treatment, or other appropriate management techniques depending upon the species."

12) Even though there could be an increase in use of the RAMP area, the Wyoming Game and Fish Department monitors the fishery and implements regulations (creel limits, etc.) to appropriately manage the fishery. In addition, Leave No Trace Education programs would educate users of the advantages of catch and release, which has already become popular among anglers on the North Platte.

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13) Livestock grazing: TOTCO is the permittee under the Pine Grove/Bolten and Lone Tree grazing allotments listed in Table 3 of the RAMP/EA. Trespass on private land is an ongoing concern and in the past, TOTCO has incurred substantial damage to range improvements and natural resources as a result of trespass. While much of this damage can be attributed to hunters, a significant amount incurs outside the hunting seasons and therefore is presumably due to illegal hunting, collection of antlers (sheds), sightseeing or activities related to use of the river corridor (such as fishing, rafting, boating). The RAMP/EA notes that the amount of conflict with ongoing livestock operations depends on whether there is public access to the river. If BLM implements management strategies that increase public access, or encourage additional use of the river, then it stands to reason that conflicts will increase. Therefore, BLM's assertion that no impacts to livestock grazing are anticipated from key action 3 is not supported by the document or by experience. The RAMP/EA describes potential impacts to vegetation caused through fugitive dust settling on forage used by livestock and wildlife; however, the document does not provide any quantification of this effect.

**BLM RFO Response to Public Comment**

13) To address this comment and the above comments, the NPRRAMP EA has now been modified (see page 40) to state:

"The potential for trespass could increase with an increase in recreational use if not properly mitigated. However, the additional signing proposed in the action alternatives for Key Actions 1 and 4 would mitigate this potential impact and is expected to cause a decrease in the number of trespassing violations. Furthermore, the risk of fire with addition of campsites could also have the potential to increase without proper mitigation. All proposed campsites (see Key Actions 1 and 5) would be developed to contain metal fire rings which would actually decrease the risk of fire in comparison to existing conditions of dispersed camping. "Providing campsites with metal fire rings that would attract former dispersed campers, who camp adjacent to private land currently, would likely improve conditions with regard to the risk of fire.

To respond to this comment, page 40 of the Draft now states:

"No negative impacts to livestock grazing are anticipated from the administrative actions of implementing a Leave-No Trace Education program. Positive impacts of this proposed educational program are described in the above Impacts Common to All Action Alternatives section of this chapter. The implementation of action alternatives for Key Action 3: SRP Permit Allocations could provide overall indirect and cumulative impacts to livestock grazing as described above in the Impacts Common to All Action Alternatives and the Cumulative Impacts sections of this document. Implementation of these two action alternatives would not be expected to cause a site-specific impact to livestock grazing that is reasonably foreseeable at this time."

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Garry Miller, The Overland Trail Cattle Company, LLC, cont...	Modeling may be performed to estimate the impact of fugitive dust from vehicle trips. Without such modeling and quantification of impacts, it appears the BLM lacks the necessary data and analysis to conclude that increased fugitive dust from implementing the preferred alternative does not have a significant impact on the environment and livestock operations. The BLM should revise the RAMP/EA to address the above deficiencies and provide an analysis and disclosure of impacts to livestock operations and recirculate for public comment. Also, see our comments concerning effects on grazing operations under Recreation.	Same as Response #13

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Garry Miller, The Overland Trail Cattle Company, LLC, cont...	14) Sensitive Species: The RAMP/EA does not adequately analyze impacts to sensitive species. The types of actions contemplated in the RAMP each have impacts to various sensitive species. These impacts are not analyzed or disclosed in the document. A species-specific assessment should be completed for BLM sensitive species to document the timing and locations of potential impacts. For example, the Ute ladies’-tresses orchid may occur within the planning area; therefore, a habitat assessment along the river corridor should be undertaken and used to determine the potential impacts of future management decisions. The BLM should use predictive models to identify potentially suitable habitat within the planning area. If avoidance of these areas by river users cannot be assured, then presence/absence surveys using established BLM survey protocols should be conducted. The Rawlins RMP prohibits recreational site development in occupied Ute ladies’-tress orchid habitat.	14) Response: Within the RAMP EA, Table 1, page 30-31 shows all BLM Wyoming Sensitive Species that have the potential to occur within the planning area. On page 43 of the RAMP EA is the Sensitive Species section that discusses impacts to sensitive species within the planning area. In addition, it shows the site specific mitigation that is associated with the Bennett peak area. Page 43, paragraph 1, states that: “Impacts could occur to Ute Ladies’ Tresses if construction or surface disturbing activities occurred within a population of the plant. Site specific surveys would be completed for any projects that would occur in the analysis area. If Ute Ladies’ Tresses were found, the project would be modified to avoid the plant. Due to this, implementation of the Plan is not expected to impact Ute Ladies’ Tresses.”

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15) The RAMP/EA states that habitat is not present for the Colorado butterfly plant. While we agree that suitable habitat is not present within the Chokecherry and Sierra Madre Wind Energy Project to conduct surveys for the Colorado butterfly plant.

16) The RAMP/EA states that habitat is not present for the Colorado butterfly plant. While we agree that suitable habitat is not present within the area; nevertheless, BLM is requiring the applicant for the Chokecherry and Sierra Madre Wind Energy Project to conduct surveys for the Colorado butterfly plant. Similarly, BLM should conduct surveys to verify that there are no Colorado butterfly plants within the planning area to ensure no adverse impacts on this BLM sensitive species. The Rawlins RMP prohibits recreational site development in occupied Colorado butterfly plant habitat.

The planning area is within greater sage-grouse core area established under the Wyoming Governor's Executive Order. As such, the results of the sage-grouse Density Disturbance Calculation Tool (DDCT) should be provided as part of the EA to disclose the impacts that might occur.

**BLM RFO Response to Public Comment**

15) All proposed developments within the RAMP are outside of the known range for Colorado butterfly plant. That was the basis for the "no effect" call for the plant. As stated in the Biological Assessment for the Chokecherry and Sierra Madre Wind Project, surveys were required within appropriate habitat, due to the fact that some of the Chokecherry and Sierra Madre Wind Project area could coincide with appropriate habitat for Colorado butterfly plant. The Biological Assessment for the Chokecherry and Sierra Madre Wind Project, page 4-9 states:

"Based on the predictive model, potential habitat for this species would not likely be found in the analysis area for the BLM's preferred alternative. Furthermore, surveys will be required in appropriate habitat prior to construction once final siting of Project facilities is complete to ensure that impacts to this species would not occur."

16) The planning area is within greater sage-grouse core area established under the Wyoming Governor's Executive Order. As such, the results of the sage-grouse Density Disturbance Calculation Tool (DDCT) should be provided as part of the EA to disclose the impacts that might occur.

Response: Page 27, Wildlife section, 1st paragraph states:

"...Greater sage-grouse are an important species of interest and a majority of the analysis area is within greater sage-grouse core area."

Page 43 of the RAMP EA is the Sensitive Species section that discusses impacts to sensitive species within the planning area. In addition, it shows the site specific mitigation that is associated with the Bennett peak area.

A density and disturbance calculation is required for projects when surface disturbance activities will take place and will be completed using the Disturbance and Density Calculation Tool. Page 43, Sensitive Species section, 2nd paragraph states: "A density and disturbance calculation will be completed in order to ensure that the project complies with BLM WY IM 2012-019."

<b>Name of Draft Review Commenter</b>	<b>Public Review Comment Submitted to Rawlins Field Office</b>	<b>BLM RFO Response to Public Comment</b>
Garry Miller, The Overland Trail Cattle Company, LLC, cont...	<p>In summary, the RAMP/EA does not fully or adequately assess the effects to BLM sensitive species and insufficient information is provided to the public to meet the disclosure requirements of NEPA. The information presented in the document is insufficient to conclude that there will not be significant impacts from implementing the preferred alternative. The RAMP/EA should be revised to disclose potential impacts to BLM sensitive species and a revised draft recirculated for public review.</p> <p>17) Wildlife: The wildlife impacts disclosed in the RAMP/EA are incomplete. In the case of raptors, BLM’s analysis focuses on the direct disturbance of lands surrounding nests as the primary impact to raptors and does not consider impacts associated with increased use of the SRMA associated with recreational opportunities. The analysis of big game in the RAMP/EA is also insufficient. The document states that implementation of the plan would not create additional impacts to big game species. However, improving parking, recreational facilities, and camping opportunities would likely increase visitation of the area during all seasons. Improving access may also lead to increases in illegal hunting.</p>	<p>17) The EA indicated that the primary impact to raptors would be human activity (page 41-41, Wildlife section, raptor subsection), The EA states: “The primary impact to raptors would be disruption from human activity during the breeding and nesting season...”</p> <p>The EA indicates that there is potential for increased disturbance to big game during critical time periods, especially during the parturition period (page 42, big game subsection).</p> <p>Mitigation related to big game is stated in the EA on pages 43-44, big game subsection, within the 1st and 2nd paragraph.</p>

Name of Draft Review Commenter	Public Review Comment Submitted to Rawlins Field Office	BLM RFO Response to Public Comment
Garry Miller, The Overland Trail Cattle Company, LLC, cont...	<p>As human disturbance is identified as the primary impact to big game, increased use and human activity would logically increase impacts to big game species. BLM should complete a more robust analysis of where and when these increased impacts would occur or discuss how such impacts would be avoided, minimized or mitigated. Without additional analysis, it is unclear if impacts will be significant.</p> <p>18) Cumulative Impacts The cumulative impacts analysis is not adequate as presented and does not fulfill BLM’s disclosure requirement under NEPA. If there are past, present or reasonably foreseeable actions, including management plans, affecting the North Platte River upstream or downstream of the planning area, then those plans and actions should be referenced and the cumulative effects should be evaluated. In particular, there are a number of other existing and reasonably foreseeable future projects that occur in the Upper North Platte watershed. These projects have the potential to contribute cumulative impacts to soils, water quality, water supply, recreation, wildlife, and a number of other resources.</p>	<p>18) To respond to this comment, the Cumulative Impacts section now contains the following addition on pg. 45 of the NPRRAMP EA:  <b>“The 2008 Rawlins Resource Management Plan provides management direction for multiple uses within and surrounding the planning area. The overall past, present, and reasonably foreseeable multiple uses which could contribute to cumulative impacts include overall increases in energy development projects, range improvements and livestock grazing, land exchanges, future recreational developments and uses, road maintenance and construction, mineral development as well as vegetation, soils and watershed restoration projects. When considered with the potential impacts of the action alternatives, proposed projects in this NPRRAMP EA, without proper mitigation, there is the potential for an overall incremental degradation in water quality and visual quality as well as impacts to wildlife and fisheries, recreation opportunities, and livestock grazing within the planning area. Monitoring of impacts to each of these resources will continue to provide for appropriate mitigation strategies and adaptive management to minimize these impacts.”</b></p>

<b>Name of Draft Review Commenter</b>	<b>Public Review Comment Submitted to Rawlins Field Office</b>	<b>BLM RFO Response to Public Comment</b>
Garry Miller, The Overland Trail Cattle Company, LLC, cont...	BLM should identify the projects in the Upper North Platte watershed that could contribute to cumulative impacts and provide a more robust cumulative impacts discussion. Thank you again for the opportunity to comment on the RAMP/EA. TOTCO hopes that through addressing these comments, BLM will avoid potential conflicts between the RAMP and TOTCO's operations and that BLM's decision regarding implementation of the RAMP will not be adverse to TOTCO's agricultural, land and business interests, or adverse to those interests held by other private landowners and private agricultural operators along the river. We look forward to working cooperatively with the BLM on this and future actions.	Same as Response #18

**Name of  
Draft Review  
Commenter**  
Jacob Budd

**Public Review Comment Submitted to  
Rawlins Field Office**

1) I am writing to comment on the North Platte River Recreation Area Management Plan (EA Number: DOI-BLM-WY-030-2013-0094-EA). I have been a citizen of Wyoming for my entire life and I try to stay current and active on issues concerning public lands.  
The proposed North Platte River Recreation Area Management Plan (RAMP) is a project that in my opinion is needed and will benefit the area very much. This update to the 1985 North Platte River RAMP has the potential to improve the quality of recreational uses on the North Platte River. The need to improve this area for fishing, camping, and sightseeing is clear as well as the need for public facilities. The potential increases in expenditures that could possibly boost the economy of Carbon County is another benefit that can come from this project. Also, since about half of the respondents to mail-back questionnaires were non-Wyoming residents, we could see a greater influx of money into Wyoming and Carbon County.

**BLM RFO Response to Public Comment**

1) The BLM acknowledges the commenter's support for the Preferred Alternatives presented within each of the Key Actions. Education of wildlife impacts are planned to be integrated in the proposed Leave No Trace Program. This comment will be given full consideration by the BLM in the selection of alternatives.

**Name of  
Draft Review  
Commenter**

Jacob Budd,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

The proposed improvements to Bennett Peak Campground seem to be a good way to reduce crowding and allow for greater numbers of visitors who want to camp and recreate in this area. Also, the additional boat ramp at Corral Creek and improving the ramp at Dugway Recreation Site could help improve ease of boat launching as well as reducing safety hazards for recreational users.

The Preferred Alternative seems to be very beneficial for all Key Actions of the plan. The leave no trace education could be a great way to decrease the amount of waste in the area.

Although, I am concerned about the increase in recreational uses and possible effects on wildlife, especially Greater Sage-Grouse and how this increase in recreational users could affect invasive species and the control of those species.

The greater number of recreational users that could be present after these changes are made to this area could have an effect on the movement of Greater Sage-grouse, especially since this is inside of the Greater Sage-Grouse core area. The movement of vehicles and road noise can negatively affect Sage-Grouse and could decrease their travel or abundance throughout the area. Noise-stress could also affect the immune system of male birds which may make them more susceptible to disease (Blickley et al. 2012).

**BLM RFO Response to Public Comment**

Same as Response #1

**Name of  
Draft Review  
Commenter**

Jacob Budd,  
cont...

**Public Review Comment Submitted to  
Rawlins Field Office**

I feel that this has not been extensively researched and the effects are still unknown of what these improvements could possibly do to sage-grouse.

The use of this area has the potential for the spread of invasive species like Zebra mussels due to anglers. Evidence indicates that recreational boating is the principal overland mode of dispersal for several freshwater invasive species, like Zebra mussels (Timar and Phaneuf 2009). I am concerned that the increased amount of people who frequent this area could possibly enhance the spread of these species. This is a difficult task for any agency and I believe that educating anglers about potential problems associated with invasive species can help; it will not solve the problem. I want to know at what point we will need people out there checking boats to make sure people are not spreading these species.

Although I believe this project is very beneficial and an improvement for Carbon County and the North Platte River Recreation Area, I believe these issues need to be addressed.

**BLM RFO Response to Public Comment**

Same as Response #1

**Name of  
Draft Review  
Commenter**

Roger Lynn

**Public Review Comment Submitted to  
Rawlins Field Office**

1) I have been guiding the Saratoga Platte River since 1997 and the reason the upper stretch is way better than average is because the access is limited. Your proposed changes will bring more pressure from Bennett Peak up stream and will end up hurting the population of fish. Just look at the Arkansas in Colorado and the Smith river in Montana to name a few. You (the BLM) make the changes and look like heroes to the Colorado population. They invade and the Fish & Game cannot keep up with the pressure. Float the river for your self. See the quality of the fishing (size of fish, fight from the fish and the quantity of big fish.) Also, admire the remoteness of the float. Then make your changes and float the river 5 years from their completed date and see what you have. You will only have yourself to look in the mirror and blame.

I am against your proposals unless you have some stringent rules that will follow them. Such as; amount of people allowed per day, when the river hits 700 cfs all floats above Bennett are canceled, strict limits and fish hook responsibilities. I have more and would be willing to chat with you about them. Please do not ruin the upper platte!

**BLM RFO Response to Public Comment**

1) The BLM acknowledges the commenter's lack of support for action alternatives which have any potential to increase visitor use. However, it is noted that the commenter has not substantively identified which alternatives are supported. This comment will be given consideration by the BLM in the selection of alternatives.

**Name of  
Draft Review  
Commenter**  
Dennis Buck

**Public Review Comment Submitted to  
Rawlins Field Office**

1) I have been a user of the North Platte River System above Saratoga since 1970. I read publications regarding the area all the time and never saw mentioned the proposed changes and meetings regarding them. Where were they published? I urge you to reconsider your extensive enlargement of the facilities and road improvements on the River as your intended purpose is to draw a lot more usage on a pristine area that in my opinion will have a very detrimental effect on it. Many areas in the West have seen devastating effects from over usage and this will just be another. As of now there is no whirling disease or other invasive species in the river, not much in the way of hassles with local private land owners and not many accidents or confrontations on the river. This will all change with an influx of people who don't know about the area or care about it.

As your charts and graphs on usage show the resource usage declines when the water conditions are not conducive to using the river. That is because the people who now use it understand that in drought years the river shouldn't have high traffic. Lots of new people coming in will not understand the and will pile in anyway and create a big problem. Please reconsider your proposals.

**BLM RFO Response to Public Comment**

1) The BLM acknowledges the commenter's lack of support for any action alternatives. This comment will be given full consideration by the BLM in the selection of alternatives. However, it is noted that the commenter has not substantively identified which alternatives are supported.

**Name of  
Draft Review  
Commenter**

Lynn Tooker

**Public Review Comment Submitted to  
Rawlins Field Office**

1) Our first introduction to Wyoming was Saratoga. On a long weekend with the family we spent it fishing with Mitch Bangert of Harrison's Guest House and Guide Service. The beauty and serenity of the river was unbelievable. Mitch has a deep passion not only for fishing but for the river, its' wildlife and all it offers. As we floated he would point out the best holes, what was biting, exactly where to place the fly and what to expect around each bend. Thanks to him, our son caught his first trout. At only 10 years old one would have thought he hooked a Marlin. It was a remarkable day! Mitch knows the river as well as you and I would know our dearest friend. What I am asking, Chris, is to listen to those who hold this piece of God's creation so dear, the ones that live, breathe and enjoy its' wonders. These are the people you genuinely need to reach out to.

**BLM RFO Response to Public Comment**

1) The BLM acknowledges the commenter's support for the comments provided by Mitch Bangert. This comment will be given full consideration by the BLM in the selection of alternatives. It is noted that the commenter has not substantively identified which alternatives are supported.